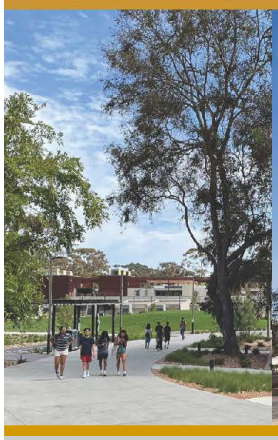
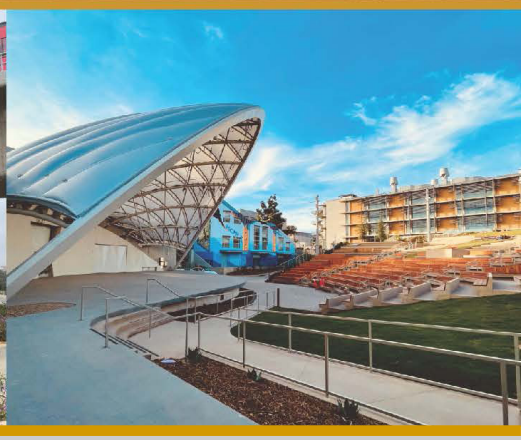
University of California San Diego

2018 Long Range Development Plan - Final Subsequent Environmental Impact Report

La Jolla Campus

July 2025



VOLUME I

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Acronyms and Abbreviations

µg/m^3	micrograms per cubic meter
AAM	annual arithmetic mean
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily trips
AFG	accelerated forecasted growth
AFY	acre-feet per year
AMSL	above mean sea level
APCD	air pollution control district
APE	Area of Potential Effect
AQIA	Air Quality Impact Analysis
AR4	Fourth Assessment Report
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
BRTR	Biological Resources Technical Report
BSB	Biomedical Sciences Buildings
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
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
CBSC	California Building Standards Code
CCA	California Coastal Act
CCC	California Coastal Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFG Code	California Fish and Game Code
CFMO	Campus Fire Marshal's Office
CFR	Code of Federal Regulations
CH_4	methane
CIP	Capital Improvement Program

City	City of San Diego
CMP	Congestion Management Process
CNEL	Community Noise Equivalent Level
CNG	compressed natural gas
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of San Diego
CPA	community planning area
CPM	Capital Program Management
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DEH	San Diego County Department of Environmental Health
DOC	California Department of Conservation
DOF	California Department of Finance
DRB	Design Review Board
EIR	Environmental Impact Report
EMS	Emergency Management System
EO	Executive Order
ESL	Environmentally Sensitive Lands
FAA	Federal Aviation Administration
FAHJ	Fire Authority Having Jurisdiction
FAR	Floor Area Ratio
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FM	Facilities Management
FMZ	fuel modification zone
FPP	Fire Prevention Plan
FTA	Federal Transit Administration
GHG	greenhouse gas
GSF	gross square feet
GWP	global warming potential
HABS	Historic American Building Survey
HALS	Historic American Landscape Survey
HCD	Housing and Community Development
HFC	hydrofluorocarbon
HI	hazard index
HMP	Habitat Management Plan
HQ	hazard quotient
HRA	health risk assessment
HVAC	heating, ventilation, and air conditioning

I-5	Interstate 5
IEPR	Integrated Energy Policy Report
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
IPPS	Integrated Procure-to-Pay Solutions
KCRC	Kumeyaay Cultural Repatriation Committee
KVP	key vantage point
LBZ	limited building zone
LCI	Governor's Office of Land Use and Climate Innovation
L_{DN}	Day Night sound level
LEED	Leadership in Energy and Environmental Design
L_{EQ}	time-averaged noise level
LID	Low Impact Development
LLG	Linscott, Law & Greenspan
LOS	Level of Service
LRA	Local Responsibility Area
LRDP	Long Range Development Plan
LRWRP	Long-Range Water Resources Plan
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MEIR	maximally exposed individual residential receptor
MEIW	maximally exposed individual worker receptor
MGD	million gallons per day
MHPA	Multiple Habitat Planning Area
MIP	Master Infrastructure Plan
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MLD	Most Likely Descendant
MMRP	Mitigation Monitoring and Reporting Plan
MOA	Memorandum of Agreement
mph	miles per hour
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer Systems
MSCP	Multiple Species Conservation Plan
MT	metric ton
MTS	Metropolitan Transit Service
MW	megawatt
MWD	Metropolitan Water District of Southern California
MWh	megawatt hours
MWWD	City of San Diego Public Utilities Metropolitan Waste Water Department
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
N/A	not applicable
NCCP	Natural Community Conservation Planning
NCTD	North County Transit District
NHTSA	National Highway Traffic Safety Administration

NO	nitrogen oxide
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	noise-sensitive land use
O_3	ozone
OEHHA	California Office of Environmental Health Hazard Assessment
OITC	outdoor-indoor transmission class
OSMP	Open Space Management Program
PDZ	Perimeter Development Zone
PI	Principal Investigator
PLWTP	Point Loma Wastewater Treatment Plant
PM	particulate matter
$PM_{2.5}$	particulate matter 2.5 microns or less in diameter
PM_{10}	particulate matter 10 microns or less in diameter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PUD	Public Utilities Department
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
REL	reference exposure level
RFS	Renewable Fuel Standard
RHNA	Regional Housing Needs Assessment
RMS	root-mean-square
RPS	Renewables Portfolio Standard
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDFR	City of San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDPD	San Diego Police Department
SDRWQCB	San Diego Regional Water Quality Control Board
SDUSD	San Diego Unified School District
SEIR	Subsequent Environmental Impact Report
SF	square feet
SF_6	sulfur hexafluoride

SIO	Scripps Institution of Oceanography
SIP	State Implementation Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SOV	single-occupancy vehicle
SO_X	oxides of sulfur
STC	sound transmission class
SWIS	Solid Waste Information System
TAC	toxic air contaminant
TCR	The Climate Registry
TDM	Transportation Demand Management
TIS	Transportation Impact Study
TNM	Traffic Noise Model
TPA	Transit Priority Area
UC	University of California
UCOP	UC Office of the President
UNFCCC	United Nations Framework Convention on Climate Change
U.S.	United States
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
UWMP	Urban Water Management Plan
VA	Veterans Administration
VC	vibration criterion
VdB	vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
Water Authority	San Diego County Water Authority
WSA	Water Supply Assessment
WUI	Wildland Urban Interface

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Executive Summary

This chapter is an executive summary of the Subsequent Environmental Impact Report (SEIR) for the University of California San Diego (UC San Diego) Update to the 2018 La Jolla Campus Long Range Development Plan (Update to the 2018 LRDP), prepared in compliance with the California Environmental Quality Act (CEQA).

This chapter highlights the major areas of importance in the environmental analysis for the proposed Update to the 2018 LRDP, as required by CEQA Guidelines Section 15123. It also provides a brief description of the Update to the 2018 LRDP, project objectives, alternatives to the Update to the 2018 LRDP, and areas of controversy/issues raised by agencies and interested parties known to UC San Diego at the time of the Draft SEIR preparation.

In addition, this chapter provides tables summarizing: (1) the potential environmental impacts that would occur as the result of implementation of the proposed Update to the 2018 LRDP compared to the potential environmental impacts that were determined to occur as a result of the 2018 LRDP; (2) potential cumulative environmental impacts that would occur as the result of implementation of the proposed Update to the 2018 LRDP compared to the potential cumulative environmental impacts that were determined to occur as a result of the 2018 LRDP; and (3) the recommended mitigation measures that would avoid or reduce significant environmental impacts. A table is also provided which compares the anticipated impacts of the proposed Update to the 2018 LRDP with those of each project alternative.

S.1. OVERVIEW

This SEIR has been prepared to update the analysis presented in the Final EIR for the UC San Diego 2018 LRDP for the La Jolla Campus. The 2018 LRDP is a broad, comprehensive, and adaptable policy framework intended to achieve UC San Diego's program goals and to inform decisions concerning land use and capital project development through a planning horizon of 2035. The proposed Update to the 2018 LRDP revises the general land use plan to guide the physical development of the campus, accounting for the current population growth and development projections, and extends the planning horizon year from 2035 to 2040.

According to CEQA Guidelines Section 15162(a), an SEIR is required when a substantial change is proposed to a project for which an EIR has been certified that may result in new or substantially more severe significant impacts than those identified in the prior EIR, or if other CEQA standards for subsequent review are met. As a result of an increasing demand for higher education, mandates from the State of California, and University of California (UC) system-wide requirements to increase enrollment, UC San Diego is experiencing higher annual rates of admitted students and associated campus population growth than was projected at the adoption of the 2018 LRDP and its accompanying EIR. Increased enrollment growth rates, in addition to increased staff growth due to the academic, research, administrative, and UC Health program needs, has prompted the need to reassess the future population and development projections of the adopted 2018 LRDP and accompanying EIR. Both campus population and anticipated space needs are now projected to grow beyond levels assumed in the 2018 LRDP and this proposed Update has been prepared to better align with the university's long-term Strategic Plan and ensure that physical plans remain solidly based on academic, research, and public service program goals.

This SEIR has been prepared in compliance with CEQA's procedural and substantive requirements to address potential new or more severe environmental impacts resulting from implementing the Update to the 2018 LRDP, as well as changes in conditions since the 2018 LRDP EIR was prepared. The UC is the CEQA lead agency for the project evaluated in this SEIR and as such The Board of Regents of the UC (The Regents) has the principal responsibility for approving the proposed Update to the 2018 LRDP. This SEIR will be used by The Regents to evaluate the environmental implications of implementing the Update to the 2018 LRDP (Amendment #1 to the 2018 LRDP). Once certified, this SEIR would also be used to tier subsequent environmental analyses for future UC San Diego development projects through the plan's horizon year of 2040.

S.2. PROJECT DESCRIPTION

The UC requires that each campus in the UC system maintain an LRDP to guide capital project development and review processes. The process of periodically updating an LRDP provides The Regents an opportunity to make certain that physical plans remain solidly based on academic, research, and public service program goals. The current LRDP for the UC San Diego campus was adopted in 2018 and provides a policy framework to guide the physical development of the campus based on academic, administrative, and support programs through 2035. The Update to the 2018 LRDP would update the previous population growth and development projections and extend the planning horizon year from 2035 to 2040.

The UC San Diego La Jolla campus is located adjacent to the communities of La Jolla and University City, within the northwest portion of the City of San Diego. UC San Diego's campus is generally composed of three distinct, but contiguous, geographical areas: the Scripps Institution of Oceanography (SIO) portion of the campus (178.7 acres), the western area of the campus (West Campus; 635.7 acres), and the eastern area of the campus (East Campus; 265.7 acres). The East and West Campuses are bisected by Interstate 5 (I-5) but are internally connected via two bridges. The La Jolla del Sol housing complex (12 acres) is located southeast of these larger geographical areas and is not contiguous to the campus. Also included in the 2018 LRDP are the beach properties, consisting of the Audrey Geisel House and an adjacent coastal canyon and beachfront parcel (25.8 acres), and the Torrey Pines Gliderport, Torrey Pines Center and Torrey Pines Court (41 acres). In total, the 2018 LRDP addresses campus properties that encompass a total of approximately 1,159 acres in La Jolla, California. The Update to the 2018 LRDP involves land use redesignations within West and East Campus and SIO, and increased growth within the West and East Campus areas.

The on-campus population at UC San Diego consists of students, academic employees (faculty), and other staff employees (including general administrative, research, and healthcare staff). Students make up the largest group, followed by staff and faculty. In fall 2023, UC San Diego had 42,400 students enrolled, making it the fourth largest UC campus in terms of student enrollment. The total La Jolla campus population in fall 2023 was 65,050 including students, staff and faculty. Campus building space totals approximately 19.5 million gross square feet (GSF) with approximately 2.1 million GSF under construction as of spring 2024.

The primary purpose of the proposed Update to the 2018 LRDP is to update the previous population growth and development projections and extend the planning horizon year from 2035 to 2040. The goals, objectives, planning principles, and land use categories presented in the 2018 LRDP remain consistent. The objectives presented in the Update to the 2018 LRDP contain changes made for clarification purposes, as described in S.1.3 below. The 2018 LRDP Elements (Land Use,

Landscape and Open Space, Circulation, and Utilities) largely remain the same with the proposed Update. No changes to the conceptual planning principles are proposed, but the geographic planning area has been increased slightly with the inclusion of the approximately 0.9-acre 8980 Via La Jolla property to West Campus.

The Update to the 2018 LRDP proposes minor changes to the 2018 LRDP predominant land use designations on the campus. All land use categories (e.g., Academic, Academic Healthcare, Academic Mixed-Use, Administrative, Community Oriented, General Services, Housing, Open Space Preserve, Science Research, and Sports and Recreation) would remain the same as the 2018 LRDP. The primary land use changes include additional General Services use areas within existing Open Space Preserve (Urban Forest and Restoration Lands); minor modifications to Academic, Academic Mixed Use, Housing, and Sports and Recreation categories through boundary adjustments to support future development opportunities, provide more efficient development siting, and to better reflect existing built conditions; the addition of a Community Oriented use with the inclusion of the project at 8980 Villa La Jolla Drive that was previously outside of the LRDP boundary; and added areas of Open Space Preserve.

The Update to the 2018 LRDP projects an increase in land use development intensity compared to the projections outlined in the 2018 LRDP. The increased density would occur within the West and East Campuses, resulting in a potential increase in mass and height of future development in these locations. To accommodate this growth, additional utility and infrastructure upgrades would be implemented as determined necessary to support the increased development.

Since implementation of the 2018 LRDP, the total campus population (i.e., students, faculty/researchers, and staff) has increased from 48,850 (fall 2015) to 65,050 (fall 2023), including 42,400 students and 22,650 faculty and staff. In consideration of state directives, student applicant demand, and campus capacity and consultation between UC San Diego's Institutional Research department and the Chancellor's Office, updated campus population projections through the year 2040 have been developed for the proposed Update to the 2018 LRDP. The student population is projected to increase to 56,000 by the 2040 horizon year, while the staff and faculty population would increase to 40,300. The projected growth assumes that the proportion of graduate students would remain 25 percent of the total student population. The total campus population is projected to be 96,300 in 2040, an increase of 30,700, or approximately 45 percent, over what was projected in the 2018 LRDP for the year 2035, with a five-year extension in the planning horizon year.

To accommodate these population projections, it is anticipated that the overall campus building space would increase from the previous projections of approximately 27.9 million GSF by 2035 to approximately 36.2 million GSF by 2040. This represents a projected net increase of approximately 8.3 million GSF compared to the growth identified in the 2018 LRDP, considering demolition of approximately 1.1 million GSF of existing facilities that is projected to be required (net new development). With this growth, campus student housing, a key development objective for the campus, is projected to grow from 19,710 beds (as of fall 2023) to 38,620 beds by 2040.

New programs and development would be necessary to accommodate the anticipated student enrollment and population growth. This includes expansion of UC San Diego's academic, clinical, housing, administrative, community oriented, and service programs. Campus growth would be accommodated through replacement of obsolete facilities and underutilized areas such as surface parking lots, repurposing of existing buildings, and construction of new facilities. Potential new utility infrastructure (electrical substation and water treatment plant) would be sited within

existing Open Space Preserve areas (Urban Forest and Restoration Land types), requiring a change in land use in these areas to General Services.

S.3. PROJECT OBJECTIVES

Similar to the 2018 LRDP, the fundamental purposes of the Update to the 2018 LRDP for the UC San Diego campus are to:

- Bring UC San Diego's long range land use planning up to date in light of changes in the economic, academic, and environmental landscape since adoption of the 2018 LRDP;
- Equip the campus with a broad, coherent, and adaptable development framework to achieve UC San Diego's program goals with regard to the UC research, public-service and teaching mission; and
- Provide a basis for future decisions concerning land uses and capital projects for the La Jolla campus.

The key project objectives of the proposed Update to the 2018 LRDP are described below and are consistent with the 2018 LRDP objectives presented in Section 2.3, LRDP Objectives, of the 2018 LRDP EIR. Projected growth has been updated in Objective 1 to account for the increased campus development projections proposed with the Update to the 2018 LRDP. Objective 1 has also been refined to address life safety and maintenance requirements for existing, aging buildings on campus to ensure compliance with the updated UC Sustainable Practices Policy and the 2024 UC Seismic Safety Policy, and continuing the 2018 LRDP goal to redevelop lower density and under-utilized sites such as older, low-density housing. The Seventh and Eighth Colleges anticipated for development under the 2018 LRDP and previously outlined in Objective 2 have been constructed; therefore, that objective has also been updated to reflect the need to maintain and support the unique undergraduate colleges system within the La Jolla Campus. Finally, with the completion of the Mid-Coast Trolley project in 2021 and the focus in the 2018 LRDP on implementing Transportation Demand Management (TDM) programs to reduce travel demand, Objective 10 has been refined to described continued enhancement of multi-modal connections and TDM programs as part of the Update.

1. Accommodate projected growth and address life-safety and deferred maintenance of existing buildings by demolishing approximately 1.1 million GSF, providing approximately 8.3 million GSF of net new facilities needed to expand academic and non-academic programs in support of the UC mission and its commitment to excellence in teaching, research and public service;
2. Maintain and support UC San Diego's unique undergraduate college system within the larger University setting to provide undergraduate students with personalized academic services and close-knit intellectual and social environment outside of their academic department;
3. Locate buildings on campus in accordance with the character, scale, and design goals expressed in the Master Planning Studies, Neighborhood Planning Studies, previous LRDPs, and the LRDP's guiding principles and its required elements;
4. Site future development to allow for the co-location and strengthening of campus programs, facilities, and activities, to continue the exchange of ideas between academics and scientists, and to create synergy between shared resources and services;

5. Activate and enliven the campus through strategic mixed-use and transit-oriented development, improved public spaces, expanded campus services, and additional on-campus housing to facilitate a living-learning campus environment;
6. Complete the redevelopment of the University Center on West Campus as a walkable "town center" featuring a mix of uses, urban densities, and pedestrian-activated ground floors, with connections to adjacent neighborhoods and the existing San Diego Trolley light-rail transit station at Pepper Canyon;
7. Provide housing for approximately 65 percent of the eligible student population by constructing new higher-density units and replacing aging low-density units while taking into account affordability, financial feasibility, physical site constraints, and campus character;
8. Develop new faculty and staff housing to provide affordable options and remain competitive with peer academic institutions in attracting top talent;
9. Expand and enhance research and training facilities and core services at UC Health in support of the region's only academic medical center;
10. Enhance multi-modal connections and continue to provide TDM programs to optimize trip reduction benefits of the light rail transit system, reduce automobile commuting, and coordinate with regional transportation programs;
11. Minimize environmental impacts through sustainable development practices related to campus planning, building siting, design, construction and operations; and
12. Recognize the importance of campus open spaces that form a balance with the built environment and continue to be responsible stewards of campus natural and biological resources.

S.4. IMPACT SUMMARY

This SEIR contains a discussion of the potential environmental effects from implementation of the proposed Update to the 2018 LRDP, including information related to existing site conditions, analyses of the type and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. In accordance with Appendices F and G of the CEQA Guidelines, the potential environmental effects of the proposed Update to the 2018 LRDP are analyzed for the following environmental issue areas:

Aesthetics
Agriculture and Forestry Resources
Air Quality
Biological Resources
Cultural Resources
Energy
Geology and Soils
Greenhouse Gas Emissions
Hazards and Hazardous Materials
Hydrology and Water Quality
Land Use and Planning
Mineral Resources
Noise
Population and Housing
Public Services
Recreation
Transportation and Circulation
Tribal Cultural Resources
Utilities and Service Systems
Wildfire

Tables ES-1, *Subsequent Review Checklist Summary*, and ES-2, *Cumulative Impacts and Mitigation*, presented at the end of this section, provide a summary of the direct and indirect and cumulative environmental impacts that could result from implementation of the Update to the 2018 LRDP and, in the case of direct impacts, feasible mitigation measures that could reduce or avoid the project's environmental impacts. For each environmental issue, Table ES-1 summarizes the impact conclusions from the 2018 LRDP EIR, whether proposed changes or new information would result in new impacts and identifies the significance conclusions for each issue topic. Applicable mitigation measures taken directly or revised from the 2018 LRDP EIR or new mitigation measures are identified which would address the impacts. Table ES-2 outlines whether there are cumulative impacts and if the Update to the 2018 LRDP's contribution to those cumulative impacts would or would not be considerable after the implementation of feasible mitigation measures.

S.5. ALTERNATIVES

The following alternatives were analyzed in detail in the SEIR and compared to the proposed Update to the 2018 LRDP. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation. The alternatives to the proposed Update to the 2018 LRDP include:

No Project Alternative (2018 LRDP). Under this alternative, the 2018 LRDP would remain as the applicable planning document for UC San Diego and, therefore, the No Project Alternative (2018 LRDP) assumes that development on the campus could continue to occur in accordance with the 2018 LRDP. Development under the 2018 LRDP has met or is nearing many of its growth parameters in terms of GSF and campus population, thereby limiting future growth and development.

Reduced Project Alternative. The Reduced Project Alternative would reduce the scale of development compared to the Update to the 2018 LRDP. Under this alternative, the campus would construct a net increase of approximately 5.75 million GSF of development compared to the approximately 8.3 million GSF proposed with the Update to the 2018 LRDP, thus, providing approximately 30 percent less GSF than the proposed Update to the 2018 LRDP. Under this alternative, student enrollment and staff population growth could remain the same as the Update to the 2018 LRDP; however, when the 5.75 million-GSF development limit is reached, no further development of housing, academic, or other planned uses would occur. Additional students, faculty, and staff would reside off campus and commute from other areas in the region rather than living on campus. In addition, future academic and non-academic programs that would have utilized the additional space would instead be located within existing facilities, as feasible.

Detailed descriptions and an analysis of potential impacts of the two alternatives compared to the proposed Update to the 2018 LRDP's impacts are presented in Chapter 5.0, as well as a discussion of the alternatives considered but rejected from further consideration. Table ES-3, *Comparison of Potentially Significant Impacts for Alternatives to the Update to the 2018 LRDP*, provides a summary comparison of the alternatives with the proposed Update to the 2018 LRDP with the purpose of highlighting whether the alternatives would result in a similar, greater, or lesser impact, than the proposed Update with regard to potentially significant impacts. The environmentally superior alternative would be the No Project Alternative (2018 LRDP), which would avoid all environmental impacts associated with implementation of the Update to the 2018 LRDP with the exception of those related to inducement of population growth and displacement of housing, but would also not achieve many of the project objectives.

Excluding the No Project Alternative (2018 LRDP), the Reduced Project Alternative would be the environmentally superior alternative because it would result in in fewer impacts than the proposed Update to the 2018 LRDP related to air quality, public services, utilities and service systems, and wildfire. Compared to the Update to the 2018 LRDP, the Reduced Project Alternative would have similar but potentially more intense less than significant impacts on greenhouse gas (GHG) emissions. While on-campus stationary source GHG emissions would be lower, the overall impact would remain less than significant due to an increase in mobile source emissions from campus traffic. This rise in emissions would result from a higher number of vehicle trips and potentially longer commutes caused by reduced on-campus housing for students, faculty, and staff. The Reduced Project Alternative would result in a greater growth-inducing impact compared to the proposed Update to the 2018 LRDP, since the reduced on-campus development would create a greater demand for additional off-campus housing to accommodate the proposed population growth. Given the restriction in new development under the Reduced Project Alternative, there are a number of key objectives that would either not be fulfilled or only partially met.

S.6. ISSUES RAISED BY AGENCIES AND THE PUBLIC

This SEIR addresses issues associated with the proposed Update to the 2018 LRDP that are known to the lead agency at the time of the preparation of this SEIR and/or were raised by agencies or interested parties during the Notice of Preparation (NOP) review period and open houses. Not all the issues or concerns raised are necessarily covered by CEQA; only those topics that are required by the CEQA Guidelines are addressed herein and others may need to be addressed outside of the CEQA process. The issues raised include:

Aesthetics

- Consider the development of high-rise buildings only in the areas of campus that are east of California Coastal Zone Boundary
- Consider low rise buildings

Air Quality

- Consider the installation of low noise and low emission generators for temporary blackouts

Biological Resources

- Consider the maintenance of succulent plants and tall trees and addition of water feature at Marshall Extended Studies site
- Consider the use of low allergenicity plants
- Consider the protection of rare plants and animals at Torrey Pines State Reserve and UC San Diego Scripps Coastal Reserve from construction traffic and emissions

Cultural and Tribal Cultural Resources

- Consider maintaining the historic value of the Gliderport
- Address Assembly Bill (AB) 52 and Senate Bill (SB) 18, and prepare a cultural resource assessment

Greenhouse Gas Emissions

- Consider a daily reduced emissions bus schedule to and from campus/La Jolla Village/ La Jolla Shores Beach

Noise

- Consider the installation of low noise and low emission generators for temporary blackouts

Land Use and Planning

- Understand that the following City and County of San Diego land use planning documents have been updated since 2018: Parks Master Plan, Climate Action Plan, Climate Resilient SD, Biodiverse SD/Vernal Pool Habitat Conservation Plan
- Understand that the following are anticipated to be adopted in Summer 2024: University Community Plan Update, General Plan Refresh (Blueprint SD)

Recreation

- Consider the installation of dog park and dog run
- Consider improved public access to UC San Diego Scripps Coastal Reserve

Transportation/Traffic

- Consider Vehicle Miles Traveled (VMT) reduction measures within and to the campus, including improvements in pedestrian/bicycles/transit infrastructure
- Ensure use of Government Office of Planning and Research Guidance to identify VMT impacts
- Ensure coordination with City and San Diego Association of Governments (SANDAG) on the future number of student enrollments as it relates to the number of housing units being proposed in the University Community Plan Update (CPU)
- Ensure coordination between the traffic studies for both the Update to the La Jolla Campus 2018 Long Range Development Plan and the City of San Diego's University CPU traffic studies
- Consider Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, and ramp improvements
- Consider mitigation to maintain bicycle/pedestrian/public transit access during construction
- Ensure that encroachment permit is obtained prior to work within Caltrans right-of-way prior to construction

- Consider implementation of vehicular speed control on Muir College Drive/Exploration Way
- Consider implementation of campus wide lane compliance and personal motor vehicle speed control

Utilities, Service Systems and Energy

- Consider the availability of affordable and reliable high-speed broadband due to it being a key component in supporting travel demand management and climate action goals through telework/remote learning

Project Alternatives

- Consider the alternative of entirely new campuses to account for growth

Appendix A of this SEIR includes all the comment letters and testimony received during the circulation of the NOP that occurred from February 29, 2024 to March 29, 2024.

Table ES-1
Subsequent Review Checklist Summary

Environmental Issue Topic	2018 LRDP EIR Impact Conclusion	Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	Update to the 2018 LRDP SEIR Significance Conclusion:	Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts:
Aesthetics					
Scenic Vistas	Less than significant with mitigation.	No	No	Less than significant with mitigation.	Aes-1: Design Requirements
Conflict with Zoning and Other Regulations for Scenic Quality	Less than significant with mitigation.	No	No	Less than significant.	No mitigation is required.
Lighting and Glare	Less than significant with mitigation.	No	No	Less than significant with mitigation.	Aes-3: Glare Reduction Measures **Bio-2H: Bird-Safe Building Standards** Bio-3J: Light Shielding
Air Quality					
Consistency with Applicable Air Quality Plan	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Cumulatively Considerable Net Increase of Nonattainment Criteria Pollutants	Significant and unavoidable (construction and operational).	No.	No.	Less than significant with mitigation (construction emissions); Less than significant with mitigation (operational).	AQ-2B: Minimize Off-Road Construction Equipment Emissions **AQ-2C: Electric Landscape Equipment** AQ-2D: Minimize Emergency Backup Generator Emissions
Impacts to Sensitive Receptors	Less than significant impact (CO hotspots); significant and unavoidable (TAC emissions).	No.	No.	Less than significant impact (CO hotspots); significant and unavoidable (TAC emissions).	AQ-2B: Minimize Off-Road Construction Equipment Emissions AQ-2D: Minimize Emergency Backup Generator Emissions

New mitigation measures for the Update to the 2018 LRDP are identified in **bold.**

Environmental Issue Topic	2018 LRDP EIR Impact Conclusion	Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	Update to the 2018 LRDP SEIR Significance Conclusion:	Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts:
Odor Emissions	No potential impact	Yes.	No.	Less than significant with mitigation.	**AQ-4: Wastewater Treatment Plant Odor Controls**
Biological Resources					
Candidate, Sensitive, or Special-Status Plant Species	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Bio-1A: Sensitive Plant Surveys Bio-1B: Barrel Cactus
Candidate, Sensitive, or Special-Status Animal Species	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Bio-2A: Coastal California Gnatcatcher Surveys Bio-2B: Coastal California Gnatcatcher Occupied Habitat Avoidance Bio-2C: Least Bell's Vireo Surveys Bio-2D: Raptor Nest Avoidance Bio-2E: General Avian Nest Avoidance **Bio-2F: Crotch's Bumble Bee Surveys** **Bio-2G: Monarch Butterfly Surveys** **Bio-2H: Bird-Safe Building Standards**

New mitigation measures for the Update to the 2018 LRDP are identified in **bold.**

Environmental Issue Topic	2018 LRDP EIR Impact Conclusion	Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	Update to the 2018 LRDP SEIR Significance Conclusion:	Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts:
Riparian Habitat and Other Sensitive Natural Communities	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Bio-3A: Sensitive Vegetation Communities Mapping Bio-3B: Site Design Bio-3C: Upland Habitat Replacement Bio-3D: Riparian Habitat Replacement Bio-3E: Pre-construction Meeting Bio-3F: Construction Monitoring Bio-3G: Best Management Practices for Tree Installations Bio-3H: Brush Management Bio-3I: Invasive Species Prevention Bio-3J: Light Shielding Bio-3K: Water Quality Best Management Practices Bio-3L: Signage and Fencing Along Ecological Reserve Bio-3M: Storm Water Facilities Adjacent to Sensitive Habitats **Bio-3N: Habitat Mitigation for Temporary Impacts**
Wetlands	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Bio-3D: Riparian Habitat Replacement **Bio-3N: Habitat Mitigation for Temporary Impacts** Bio-4: Jurisdictional Delineation

New mitigation measures for the Update to the 2018 LRDP are identified in **bold.**

Environmental Issue Topic	2018 LRDP EIR Impact Conclusion	Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	Update to the 2018 LRDP SEIR Significance Conclusion:	Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts:
Cultural Resources					
Historical Resources (Built Environment)	Less than significant with mitigation or significant and unavoidable, depending on the type of historic resource and extent of the impacts.	No.	No.	Less than significant with mitigation or significant and unavoidable, depending on the type of historic resource and extent of the impacts.	Cul-1A: Compliance with the Standards Cul-1B: Project Redesign Cul-1C: HABS or HALS Documentation Cul-1D: Relocation Cul-1E: Interpretation/ Commemoration Cul-1F: Registration Cul-1G: Salvage
Archaeological Resources	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Cul-2A: Evaluation Cul-2B: Avoidance Cul-2C: Documentation and Treatment Cul-2D: Unknown Resources Cul-2E: Cultural Resources Construction Monitoring Protocol
Human Remains	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Cul-2D: Unknown Resources Cul-2E: Cultural Resources Construction Monitoring Protocol
Energy					
Wasteful, Inefficient, or Unnecessary Use of Energy	Less than significant.	No.	No.	Less than significant with mitigation.	GHG-1A: Decarbonization of the Central Utilities Plant
Conflict with Renewable Energy or Energy Efficiency Plan	Less than significant.	No.	No.	Less than significant with mitigation.	GHG-1A: Decarbonization of the Central Utilities Plant

New mitigation measures for the Update to the 2018 LRDP are identified in **bold.**

Environmental Issue Topic	2018 LRDP EIR Impact Conclusion	Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	Update to the 2018 LRDP SEIR Significance Conclusion:	Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts:
Greenhouse Gas Emissions					
Generate GHG Emissions	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	GHG-1A: Decarbonization of the Central Utilities Plant GHG-1B: Electric Charging Stations
Consistency with Applicable Plan	Less than significant.	No.	No.	Less than significant with mitigation.	GHG-1A: Decarbonization of the Central Utilities Plant GHG-1B: Electric Charging Stations
Noise					
Exceed Noise Standards	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Noi-1C: Stationary Noise Source Screening Distances Noi-1D: Stationary Noise Source Preliminary Assessment Noi-1E: Stationary Noise Source Project-Specific Analysis Noi-1F: Construction Noise Screening Distance
Excessive Groundborne Vibration or Noise	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Noi-2B: Construction Vibration Screening Distance
Population and Housing					
Direct Inducement of Substantial Unplanned Population Growth	Significant and unavoidable (direct); less than significant (indirect).	No.	No.	Significant and unavoidable (direct); less than significant (indirect).	No feasible mitigation is available for direct inducement of substantial population growth in the area.

New mitigation measures for the Update to the 2018 LRDP are identified in **bold.**

Environmental Issue Topic	2018 LRDP EIR Impact Conclusion	Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	Update to the 2018 LRDP SEIR Significance Conclusion:	Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts:
Displacement of Housing	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Public Services					
Fire Protection Facilities	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Police Protection Facilities	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Public School Facilities	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Transportation and Circulation					
Compliance with Circulation System Programs, Plans, Ordinances, or Policies	Significant and unavoidable.	No.	No.	Less than significant.	No mitigation is required.
Induce Substantial Vehicle Miles Traveled	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Tribal Cultural Resources					
Regional Loss of Tribal Cultural Resources	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Cul-2D: Unknown Resources Cul-2E: Cultural Resources Construction Monitoring Protocol
Utilities and Service Systems					
New Utilities Facilities	Less than significant.	Yes.	No.	Less than significant with mitigation.	**Util-1: Downstream Sewer Assessment** **Util-2: Downstream Wastewater Capacity**
Water Supply Availability	Less than significant.	No.	No.	Less than significant.	No mitigation is required.

New mitigation measures for the Update to the 2018 LRDP are identified in **bold.**

Environmental Issue Topic	2018 LRDP EIR Impact Conclusion	Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	Update to the 2018 LRDP SEIR Significance Conclusion:	Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts:
Wastewater Treatment Capacity	Less than significant.	Yes.	No.	Less than significant with mitigation.	**Util-1: Downstream Sewer Assessment** **Util-2: Downstream Wastewater Capacity**
Solid Waste Generation	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Compliance with Solid Waste Regulations	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Wildfire					
Emergency Response Plan or Emergency Evacuation	Less than significant with mitigation.	No.	No.	Less than significant with mitigation.	Haz-6: Roadway Closure Notification **WF-1: Project Review and Design Requirements**
Wildfire Pollutant Concentrations	Less than significant.	No.	No.	Less than significant.	No mitigation is required.
Installation or Maintenance of Associated Infrastructure	Not required to be analyzed in 2018 LRDP EIR.	N/A	N/A	Less than significant.	No mitigation is required.
Flooding or Landslides	Less than significant.	No.	No.	Less than significant.	No mitigation is required.

New mitigation measures for the Update to the 2018 LRDP are identified in **bold.**

Table ES-2
Cumulative Impacts and Mitigation

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Aesthetics				
Degradation of scenic vista(s).	Significant.	Not cumulatively considerable with Aes-1.	Less than significant.	Not cumulatively considerable.
Conflict with applicable zoning and other regulations governing scenic quality.	Significant.	Not cumulatively considerable with Aes-2A and Aes-2B.	Significant.	Not cumulatively considerable.
New source of substantial light or glare on campus.	Significant.	Not cumulatively considerable with Aes-3.	Significant.	Not cumulatively considerable with Aes-1, Bio-2H, and Bio-3J.
Air Quality				
Consistency with applicable air quality plan.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Cumulatively considerable net increase of nonattainment criteria pollutants.	Significant and unavoidable.	Cumulatively considerable.	Significant and unavoidable.	Not cumulatively considerable with AQ-2B and AQ-2C.
Expose sensitive receptors to substantial pollutant concentrations.	Significant and unavoidable.	Cumulatively considerable.	Significant and unavoidable.	Cumulatively considerable, even with AQ-2B and AQ-2D.
Odor emissions	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable with AQ-4.
Biological Resources				
Regional loss of sensitive plants, animals, and vegetation communities.	Significant.	Not cumulatively considerable.	Significant.	Not cumulatively considerable with Bio-1A, Bio-1B, Bio-2A through Bio-2G.
Regional loss of riparian or other sensitive natural communities.	Significant.	Not cumulatively considerable.	Significant.	Not cumulatively considerable with implementation of Bio-3A through Bio-3N.
Federally protected wetlands as defined by Section 404 of the Clean Water Act.	Significant.	Not cumulatively considerable.	Significant.	Not cumulatively considerable with Bio-3D, Bio-3E through Bio-3N, and Bio-4.

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Cultural Resources				
Regional loss of built environment resources.	Significant.	Cumulatively considerable and unavoidable.	Significant.	Cumulatively considerable and unavoidable, even with Cul-1A, Cul-1B, Cul-1C; Cul-1D; Cul-1E; Cul-1F; and Cul-1G.
Regional loss of archaeological resources and human remains.	Significant.	Not cumulatively considerable.	Significant.	Not cumulatively considerable with Cul-2A, Cul-2B, Cul-2C, Cul-2D, and Cul-2E.
Energy				
Wasteful, Inefficient, or Unnecessary Use of Energy.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable with GHG-1A.
Conflict with Renewable Energy or Energy Efficiency Plan.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable with GHG-1A.
Greenhouse Gas Emissions				
Generate GHG Emissions.	Significant.	Not cumulatively considerable.	Significant.	Not cumulatively considerable with GHG-1A and GHG-1B.
Consistency with Applicable Plan.	Significant.	Not cumulatively considerable.	Significant.	Not cumulatively considerable with GHG-1A and GHG-1B.
Noise				
Exceed Noise Standards.	Potentially significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with Noi-1C through Noi-1F.
Excessive groundborne vibration or noise.	Potentially significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with Noi-2B.
Population and Housing				
Direct inducement of substantial population growth in an area.	Significant (direct); less than significant (indirect).	Cumulatively considerable (direct); not cumulatively considerable (indirect).	Significant (direct); less than significant (indirect).	Cumulatively considerable (direct); not cumulatively considerable (indirect).

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Indirect inducement of substantial population growth in an area.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Regional displacement of housing and people.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Public Services				
Potential adverse physical impacts from new fire protection facilities.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Potential adverse physical impacts from new police protection facilities.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Potential adverse physical impacts from new school facilities.	Less than significant.	Not cumulatively considerable.	Potentially significant.	Cumulatively considerable and unavoidable, even with PS-1.
Transportation				
Compliance with Circulation System Programs, Plans, Ordinances, or Policies.	Significant.	Cumulatively considerable.	Less than Significant.	Not cumulatively considerable.
Induce Substantial Vehicle Miles Traveled.	Less than Significant.	Not cumulatively considerable.	Less than Significant.	Not cumulatively considerable.
Tribal Cultural Resources				
Regional loss of tribal cultural resources.	Potentially significant.	Cumulatively considerable and unavoidable.	Potentially significant.	Cumulatively considerable and unavoidable, even with Cul-2D and Cul-2E.
Utilities and Service Systems				
Regional development could generate a cumulative demand for new, or an expansion of existing, water, waste water, or storm water facilities.	Less than significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with implementation of Util-1 and Util-2.

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Regional development could generate cumulative demand beyond water supply availability.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Regional development could cumulatively affect wastewater treatment capabilities.	Less than significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with implementation of Util-1 and Util-2.
Regional development could impact compliance with solid waste regulations.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Wildfire				
Emergency response plans or emergency evacuation plans.	Potentially significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with implementation of Haz-6 and WF-1.
Pollutant concentrations.	Not analyzed.	Not analyzed.	Less than significant.	Not cumulatively considerable.
Installation or maintenance of associated infrastructure.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Flooding or landslides.	Not analyzed.	Not analyzed.	Less than significant.	Not cumulatively considerable.

Table ES-3
Comparison of Potentially Significant Impacts for Alternatives to the Update to the 2018 LRDP

Issue Areas with Potential for Significant Impacts under the Update to the 2018 LRDP or its Alternatives	Update to the 2018 LRDP		Alternatives to the Update to the 2018 LRDP	
	Without Mitigation	With Mitigation	No Project (2018 LRDP)	Reduced Project Alternative
Aesthetics				
Scenic Vistas	PS	LS	=	=
Conflict with Zoning and Other Regulations for Scenic Quality	LS	N/A	=	=
Lighting and Glare	PS	LS	=	=
Air Quality				
Consistency with Applicable Air Quality Plan	LS	N/A	=	=
Cumulatively Considerable Net Increase of Nonattainment Criteria Pollutants	PS	LS	>	=
Impacts to Sensitive Receptors	LS (CO hotspots); PS (TAC emissions)	N/A (CO hotspots); SU (TAC emissions)	=	=
Odor Emissions	PS	LS	<	=
Biological Resources				
Candidate, Sensitive, or Special-Status Plant Species	PS	LS	=	=
Candidate, Sensitive, or Special-Status Animal Species	PS	LS	=	=
Riparian Habitat and Other Sensitive Natural Communities	PS	LS	=	=
Wetlands	PS	LS	=	=
Cultural Resources				
Historical Resources (Built Environment)	PS	LS or SU	=	=
Archaeological Resources	PS	LS	=	=
Human Remains	PS	LS	=	=
Energy				
Wasteful, Inefficient, or Unnecessary Use of Energy	PS	LS	<	=
Conflict with Renewable Energy or Energy Efficiency Plan	PS	LS	<	=
Greenhouse Gas Emissions				
Generate GHG Emissions	PS	LS	<	=
Consistency with Applicable Plan	PS	LS	<	=
Noise				
Exceed Noise Standards	PS	LS	=	=
Excessive Groundborne Vibration or Noise	PS	LS	=	=

Issue Areas with Potential for Significant Impacts under the Update to the 2018 LRDP or its Alternatives	Update to the 2018 LRDP		Alternatives to the Update to the 2018 LRDP	
	Without Mitigation	With Mitigation	No Project (2018 LRDP)	Reduced Project Alternative
Population and Housing				
Direct Inducement of Substantial Unplanned Population Growth	PS (direct); LS (indirect)	SU (direct); N/A (indirect)	=	=
Displacement of Housing	LS	N/A	=	=
Public Services				
Fire Protection Facilities	LS	N/A	=	=
Police Protection Facilities	LS	N/A	=	=
Public School Facilities	LS (direct); PS (cumulative)	N/A (direct); SU (cumulative)	<	=
Transportation and Circulation				
Compliance with Circulation System Programs, Plans, Ordinances, or Policies	LS	N/A	>	=
Induce Substantial Vehicle Miles Traveled	LS	N/A	=	=
Tribal Cultural Resources				
Regional Loss of Tribal Cultural Resources	PS	LS (direct) SU (cumulative)	=	=
Utilities and Service Systems				
New Utilities Facilities	PS	LS	<	=
Water Supply Availability	LS	N/A	=	=
Wastewater Treatment Capacity	PS	LS	<	=
Solid Waste Generation	LS	N/A	=	=
Compliance with Solid Waste Regulations	LS	N/A	=	=
Wildfire				
Emergency Response Plan or Emergency Evacuation	PS	LS	=	=
Wildfire Pollutant Concentrations	LS	N/A	=	=
Installation or Maintenance of Associated Infrastructure	LS	N/A	=	=
Flooding or Landslides	LS	N/A	=	=

LS Less than significant impact
PS Potentially significant impact
SU Significant and unavoidable impact
N/A Not applicable (i.e., no mitigation measures proposed)
= Impacts would be similar to those of the proposed Update to the 2018 LRDP
> Impacts would be greater than those of the proposed Update to the 2018 LRDP
< Impacts would be less than those of the proposed Update to the 2018 LRDP

1.0 Introduction

1.1 PURPOSE AND NEED FOR THE UPDATE TO THE 2018 LRDP

This Draft Subsequent Environmental Impact Report (SEIR) has been prepared to update the analysis presented in the Final EIR for the University of California San Diego (UC San Diego) 2018 Long Range Development Plan (2018 LRDP) for the La Jolla Campus. On November 15, 2018, the Board of Regents of the University of California (The Regents) approved the 2018 LRDP and certified the Final EIR (hereafter referred to as the 2018 LRDP EIR; State Clearinghouse No. 2016111019) that analyzed and disclosed the impacts from implementation of the 2018 LRDP. The 2018 LRDP is a broad, comprehensive, and adaptable policy framework intended to achieve UC San Diego's program goals and guide decisions concerning land use and capital project development through a planning horizon of 2035. The 2018 LRDP contains a land use plan that is based upon projected campus population growth and the anticipated space requirements and land uses associated with the expansion of UC San Diego's academic, administrative, healthcare, and support programs through academic year 2035-2036.

The 2018 LRDP anticipated that the total campus population would grow by 16,750 people over the 2018 LRDP planning period, resulting in a total population of 65,600 students, faculty, and staff by 2035. Relative to campus development, the 2018 LRDP planned for the addition of 8.9 million gross square feet (GSF) of new academic, research, and support facilities, and 8,900 new housing beds.

Since the 2018 LRDP EIR was certified, fifteen Addenda have been prepared to evaluate the consistency of a variety of campus development projects within the scope of the environmental impact analysis of the 2018 LRDP EIR. Since baseline development data was collected in 2015, campus building space has increased from 15.7 million GSF to approximately 19.5 million GSF, with approximately 2.1 million GSF under construction as of spring 2024. As a result of an increasing demand for higher education and system-wide requirements to accommodate increased enrollment and resulting campus population, UC San Diego is experiencing significantly higher rates of admitted students and associated campus population growth than was projected at the adoption of the 2018 LRDP and its accompanying EIR.

The proposed Update to the 2018 LRDP revises the general land use planning document that is a guide for the physical development of the campus, accounting for the current population growth and development projections and extending the planning horizon year from 2035 to 2040. The goals, objectives, and principles of the 2018 LRDP remain consistent.

1.2 TYPE OF CEQA DOCUMENT

According to California Environmental Quality Act (CEQA) Guidelines Section 15162(a), a Subsequent EIR is required when a substantial change is proposed to a project for which an EIR has been certified that may result in new or substantially more severe significant impacts than identified in the prior EIR or other CEQA standards for subsequent review are met. The 2018 LRDP

EIR evaluated a campus development scenario of up to approximately 27.8 million GSF in building space to accommodate a total population of 65,600 students, faculty, and staff by 2035. The Update to the 2018 LRDP proposes changes to the campus land use plan, increase in total campus population and development growth, and extension of the horizon year from 2035 to 2040. UC San Diego has determined that these changes are substantial changes that may result in new or substantially more severe significant impacts than identified in the 2018 LRDP EIR. Accordingly, preparation of a SEIR is appropriate for the Update to the 2018 LRDP.

Section 15168 of the CEQA Guidelines provides for the preparation of a Program EIR for a series of actions that can be characterized as one large project and are related either geographically, or as logical parts in a chain or contemplated actions, or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. This Update to the 2018 LRDP SEIR is a Program SEIR that evaluates the effects of LRDP implementation at a program level.

The UC is the CEQA lead agency for this SEIR. The UC is governed by The Regents, which under Article IX, Section 9 of the California Constitution, has "full powers of organization and governance" subject only to very specific areas of legislative control and not subject to local municipal land use regulations. The Regents has the principal responsibility for approving UC San Diego projects, including the proposed Update to the 2018 LRDP. Before The Regents can approve the Update to the 2018 LRDP, The Regents must evaluate and disclose the environmental impacts of approval and implementation of the plan.

Adoption of the Update to the 2018 LRDP does not constitute a commitment to any specific project, construction schedule, or funding priority. When certified, this SEIR will serve as the environmental document for the proposed Update to the 2018 LRDP. Environmental review of individual projects would be tiered from this SEIR, as well as from the 2018 LRDP EIR, in accordance with CEQA's subsequent review standards through the plan's horizon year of 2040, or at which time a new LRDP and EIR is prepared. As described further in Chapter 3.0, *Environmental Setting, Impacts, And Mitigation*, the 2018 LRDP EIR may also be used in the future discretionary decisions of the University and responsible agencies as part of consideration of the Update to the 2018 LRDP and is herein incorporated by reference.

1.3 INTENDED USES OF THE SEIR

UC San Diego has prepared this SEIR evaluating the environmental effects of the Update to the 2018 LRDP for the following purposes:

- To satisfy the requirements of CEQA (Public Resources Code [PRC], Sections 21000-21178), the CEQA Guidelines (California Code of Regulations [CCR], Title 4, Chapter 14, Sections 15000-15387), and the University of California Guidelines for Implementation of CEQA;

- To inform the public, the local community, responsible and interested public agencies, and The Regents of the nature of the proposed project, its potential significant environmental effects, measures to mitigate those effects, and alternatives to the proposed project;

- To enable The Regents to consider the environmental consequences of approving the Update to the 2018 LRDP;

- To provide a basis for tiering subsequent environmental documents from the Update to the 2018 LRDP SEIR pursuant to CEQA Guidelines Sections 15152, 15164, 15168(c), and 15183.5 and other CEQA provisions; and

- For consideration by responsible agencies in issuing permits and approvals for projects under the Update to the 2018 LRDP and other actions.

As required by CEQA, this SEIR:

- Assesses the potentially significant direct and indirect environmental effects of the proposed Update to the 2018 LRDP, as well as the potentially significant cumulative impacts that could occur from implementation of the 2018 LRDP in conjunction with other reasonably foreseeable development and compares it to the findings in the 2018 LRDP EIR;

- Identifies potential feasible means of avoiding or substantially lessening significant adverse impacts; and

- Evaluates a range of reasonable alternatives to the Update to the 2018 LRDP, including the required No Project Alternative.

This SEIR was prepared in accordance with PRC Section 21080.09, which specifies how CEQA applies to UC long range development plans and other UC planning activities. The 2018 LRDP is being updated to guide land and infrastructure development that could be built within the UC San Diego La Jolla campus to support a projected level of campus population growth through a 2040 planning horizon year. It is not an implementation plan, and its approval does not constitute a commitment to any specific project, construction schedule, or funding priority nor does it constitute a commitment by the University to campus population growth or a certain amount of development. According to PRC Section 21080.09:

- A "Long Range Development Plan" is defined as a physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center of public higher education.

- The approval of an LRDP is subject to CEQA and requires the preparation of an EIR. Environmental effects relating to changes in campus population levels shall be considered in the EIR.

- Approval of a project on a campus may be addressed in a tiered environmental analysis based on an LRDP EIR.

Compliance with PRC Section 21080.9 satisfies the obligations of public higher education institutions to consider the environmental impact of academic and campus population plans as they affect campuses or medical centers, provided that any such plans shall become effective only after the environmental effects of those plans have been analyzed in a long range development plan environmental impact report or tiered analysis. The University, as the lead agency, is required to consider the information in the SEIR, along with any other relevant information, in making its decisions on the proposed project. Although the SEIR does not determine the ultimate decision that will be made regarding implementation of the Update to the 2018 LRDP, CEQA requires the University to consider the information in the SEIR and make findings regarding each significant effect identified in the SEIR. The Regents will review and consider certification of the Final SEIR

prior to any decision on whether to approve the Update to the 2018 LRDP (Amendment #1 to the 2018 LRDP).

1.4 ENVIRONMENTAL REVIEW PROCESS

1.4.1 NOTICE OF PREPARATION AND SCOPING

In response to its decision to prepare an SEIR, UC San Diego staff prepared a Notice of Preparation (NOP) in compliance with CEQA Guidelines Section 15082 addressing the scope and contents of the SEIR (Appendix A). The NOP was mailed and emailed to a distribution list consisting of the State Clearinghouse, responsible, trustee, and other relevant local, state, and federal agencies, and interested individuals and organizations. The NOP was also published in the San Diego Union-Tribune newspaper and was made available electronically on the UC San Diego Campus Planning LRDP website. A 30-day comment period on the NOP commenced on February 29, 2024.

During the comment period, a scoping meeting was held at the UC San Diego Faculty Club on March 20, 2024, to solicit input from interested agencies, individuals, and organizations on the content of and topics for the SEIR. The NOP, its publication notice, and comments received during public review of the NOP are included in Appendix A to this SEIR. Comments received during the scoping process have been taken into consideration during the preparation of this SEIR. An outline of the issues noted during the scoping process is contained in the Issues Raised by Agencies and the Public discussion in the Executive Summary chapter of this report. The environmental conditions evaluated as the baseline in this SEIR are those that existed at the time the NOP was circulated.

1.4.2 PUBLICATION OF DRAFT SEIR

As required under State CEQA Guidelines Sections 15087, the Draft SEIR was made available for review and comment by the public and public agencies for 45 days. Comments on the Draft SEIR were requested to be mailed to UC San Diego or submitted through the UC San Diego 2018 LRDP EIR website. The information for the public hearing was included with the Notice of Availability for the Draft SEIR.

A hard copy of the Draft SEIR was made available for review during normal operating hours for the duration of the public review period at the following locations:

- UC San Diego Campus Planning Office at 10280 North Torrey Pines Road, Suite 460, La Jolla, CA 92037
- UC San Diego Geisel Library – Social Sciences and Humanities Library Reference Desk

An electronic version of the Draft SEIR was available for review or downloading from the UC San Diego Update to the 2018 LRDP website (https://plandesignbuild.ucsd.edu/planning/environmental.html#Projects-Currently-Under-Enviro) during the 45-day public review period. A public hearing on the Draft SEIR was held at the UC San Diego campus on April 22, 2025, during the public review period; noticing for the hearing was on the Update to the 2018 LRDP website, as well as in the Notice of Availability for the Draft SEIR that was distributed to interested parties and published in the campus UC San Diego Guardian and San Diego Union-Tribune newspapers. Comments addressing the scope and adequacy of the

environmental analysis were solicited from the public, public agencies and interested organizations during the Draft SEIR public review.

As part of this Final SEIR, UC, as Lead Agency, has provided responses to comments received on the Draft SEIR per CEQA Guidelines Section 15088. Detailed response to comments received during public review, a Mitigation Monitoring and Monitoring Program, Findings of Fact, and a Statement of Overriding Considering for impacts identified in the Draft SEIR as significant and unmitigable were prepared and compiled as part of the SEIR finalization process.

The UC, as CEQA Lead Agency, considered the written comments received on the Draft SEIR and comments received at the public hearing in making its decision whether to certify the Final SEIR as complete and in compliance with CEQA, and whether to approve or deny the proposed project, or take action on a project alternative. In the final review of the proposed Update to the 2018 LRDP, environmental considerations, as well as economic and social factors, were evaluated to determine the most appropriate course of action to be made at a UC Regents meeting.

To ensure inclusion in the Final SEIR and full consideration by the lead agency, comments on the Draft SEIR were required to be received during the 45-day public review period, which concluded at 5:00 PM on Monday, May 19, 2025. They were required to be e-mailed to env-review@ucsd.edu or sent to:

University of California, San Diego
Alison Buckley
Senior Environmental Planner
9500 Gilman Drive #0074
La Jolla, CA 92093-0074

1.4.3 ADDITIONAL PUBLIC OUTREACH

The Update to the 2018 LRDP considers the substantial campus, public, and agency engagement undertaken for the development of the approved 2018 LRDP. The updated growth projections were developed in consultation between UC San Diego Campus Planning and the Office of the Chancellor, as well as other key campus groups that included Operations Management and Capital Programs; Housing, Dining and Hospitality; Real Estate; Academic Affairs; Human Resources; and UC San Diego Health. In addition, significant outreach was undertaken to gain feedback and educate the campus, public community, and outside agencies on the need for the Update.

Meetings, presentations, and/or updates on the Update to the 2018 LRDP and the SEIR were made to the following UC San Diego groups:

- Campus/Community Planning Committee
- Academic Senate: Committee on Campus Community and Environment and Committee on Campus Climate Change
- Marine Sciences Physical Planning Committee
- Open Space Committee
- Staff Association
- Retirement Association Board
- UC San Diego Health
- All-Campus Staff Town Hall

- Health Staff Town Hall

In addition, UC San Diego met with, gave presentations, and/or provided updates to the following external agencies, community groups, and other interested parties:

- California Department of Transportation (Caltrans)
- San Diego Associated Governments (SANDAG) Regional Planning
- San Diego Unified School District (SDUSD)
- City of San Diego – City Planning Department
- City of San Diego – Public Utilities Department (PUD)
- Campo Band of Mission Indians
- San Pasqual Band of Mission Indians
- Sycuan Band of Kumeyaay Indians
- Kumeyaay Cultural Repatriation Committee
- Elected Officials via City Hall's UC San Diego Day and campus visit by City Council President Joe LaCava and City Councilmember Kent Lee, Elected Officials Reception
- Local community planning groups, including:
    - La Jolla Community Planning Association
    - University Community Planning Group
    - La Jolla Shores Association
    - La Jolla Town Council
    - University City Community Association
- San Diego Regional Chamber of Commerce – Business Leaders Event
- Community Advisory Group, which is made up of community leaders and UC San Diego staff and faculty
- Capital Program Management's Construction Industry Partner Event

1.5 OTHER AGENCY APPROVALS

UC San Diego is part of the UC, a constitutionally created State entity, and is not subject to municipal regulations of surrounding local governments, for uses on property owned or controlled by the UC that are in furtherance of the UC's education purposes.

However, under CEQA, state and local agencies other than the Lead Agency that have discretionary authority over a project, or aspects of a project, are considered responsible agencies. No other public agencies would have discretionary authority over the proposed Update to the 2018 LRDP; however, one or more may have discretionary authority over subsequent projects that may be implemented under the proposed Update to the 2018 LRDP. The following is a list of some federal, state, and regional agencies that may have discretionary authority over subsequent projects implemented under the Update to the 2018 LRDP. Federal agencies are not responsible agencies under CEQA.

- California Coastal Commission (CCC)
- California Department of Fish and Wildlife (CDFW)
- Caltrans
- City of San Diego

- San Diego Air County Pollution Control District (SDAPCD)
- San Diego Regional Water Quality Control Board (SDRWQCB)
- SANDAG
- San Diego Metropolitan Transit System (MTS)
- U.S. Army Corps of Engineers (USACE)
- USFWS

As individual projects are proposed, permits and approvals may be needed depending on the characteristics of those projects. A list of potential permits and authorizations that could be required for those subsequent projects is presented in Section 1.7, Other Agency Approvals, of the 2018 LRDP EIR. Discretionary actions and approvals for the Update to the 2018 LRDP SEIR are listed in Section 2.7, Discretionary Actions and Approvals, of this SEIR.

1.6 ORGANIZATION OF THE SEIR

This Final SEIR is organized into three volumes. Volume I addresses the impacts of the physical development of the proposed Update to the 2018 LRDP. Associated technical appendices are contained in Volume II. Volume III contains the Draft SEIR comments, responses, and summary of revisions that have been incorporated into the Final SEIR, as well as the Mitigation Monitoring and Monitoring Program (MMRP) for the Update to the 2018 LRDP.

Volume I of the Update to the 2018 LRDP SEIR includes the following:

- **Executive Summary.** Summarizes the proposed Update to the 2018 LRDP, environmental impacts that would result from implementation of the Update to the 2018 LRDP, proposed mitigation measures that would avoid or reduce impacts, the level of significance of impacts both before and after mitigation; and alternatives to the project and their impacts relative to those of the proposed Update to the 2018 LRDP.

- **Chapter 1.0, Introduction.** Provides an introduction and overview describing the purpose and need for the proposed Update to the 2018 LRDP, the SEIR requirements, the intended use of the SEIR, and the review and certification process.

- **Chapter 2.0, Project Description.** Provides a detailed description of the proposed Update to the 2018 LRDP, including its location, background information, key objectives, structural and technical characteristics; addresses sustainable development; and describes LRDP implementation and discretionary approvals for the SEIR.

- **Chapter 3.0, Environmental Setting, Impacts and Mitigation.** Contains the subsequent programmatic environmental review for project and cumulative analysis. The subsection for each environmental topic contains an introduction and description of the setting, issues to be analyzed, standards of significance, methodology used to evaluate impacts and appropriate mitigation measures. Document references and citations are also contained under each environmental topic addressed in this chapter.

- **Chapter 4.0, Other CEQA Considerations.** Provides discussions required by CEQA regarding unavoidable significant impacts, growth inducing impacts, and environmental effects found not to be significant.

- **Chapter 5.0, Alternatives.** Describes alternatives to the proposed Update to the 2018 LRDP that could avoid or substantially lessen significant effects and evaluates their environmental effects in comparison to the proposed project. This section includes an analysis of the No Project Alternative, among others, as required by CEQA.

- **Chapter 6.0, Preparers and Persons Consulted.** Identifies the persons who prepared this SEIR and those who were consulted during its preparation.

Volume II of the Final SEIR consists of supporting materials and technical appendices as listed in the SEIR Table of Contents.

Volume III consists of the Draft SEIR Comments and Responses, Revisions to the Draft SEIR, and MMRP.

1.7 PUBLICATION OF FINAL SEIR

Following the close of the Draft SEIR public review period, the University reviewed the written comments received and prepare responses to the comments that pertain to the environmental analysis and effects of the proposed Update to the 2018 LRDP. The Final SEIR consists of the three volumes described above. The Final SEIR will be considered by The Regents in a public meeting and certified if the Final SEIR is determined to be in compliance with CEQA.

If the SEIR is certified by The Regents and the Update to the UC San Diego 2018 La Jolla Campus LRDP (Amendment #1 to the 2018 LRDP) is approved, a new Mitigation Monitoring and Reporting Plan (MMRP) will be adopted. The MMRP will contain the mitigation measures set forth in the SEIR for those environmental topics that were reevaluated in the SEIR as well as the mitigation measures in the 2018 LRDP EIR that apply to environmental topics that were not reevaluated in the SEIR.

2.0 Project Description

2.1 PROJECT BACKGROUND AND PURPOSE

A Long Range Development Plan (LRDP) is defined by statute (PRC 21080.09) as a "physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center of public higher education." The Regents of the University of California (The Regents) approved the first LRDP for the UC San Diego La Jolla campus in 1963 with subsequent revisions or updates occurring in 1966, 1981, 1989, 2004, and 2018. Campus LRDPs are driven by academic programming goals and projections of both enrollment and service populations to achieve goals by an established horizon year. The LRDPs describe the potential development capacity for the entire campus based on available development or redevelopment sites and program growth or replacement needs.

The 2018 LRDP outlines campus development and population projections and provides a planning framework and land use plan to guide physical development of the campus through the planning horizon year of 2035. The 2018 LRDP projects that the campus would grow to approximately 27.9 million GSF of building space and have a campus population of 65,600, including students, faculty, and staff (UC San Diego 2018a). In fall 2023, UC San Diego had 42,400 students enrolled, making it the fourth largest UC campus in terms of student enrollment (UC San Diego 2024a). The total La Jolla campus population in fall 2023 was 65,050 including students, staff and faculty. UC San Diego staff who work at the Hillcrest Medical Center or off-campus locations are not considered part of the La Jolla Campus LRDP population. Campus building space totals approximately 19.5 million GSF with approximately 2.1 million GSF under construction as of spring 2024.

As a result of an increasing demand for higher education, mandates from the State of California, and UC system-wide requirements to increase enrollment, UC San Diego is experiencing higher annual rates of admitted students and associated campus population growth than was projected at the adoption of the 2018 LRDP and its accompanying Environmental Impact Report (EIR; UC San Diego 2018b, 2024a). In addition to the factors leading to demand for higher education cited in Section 2.1 of the 2018 LRDP EIR, directives from the State of California and UC have prioritized access to higher education and associated student enrollment growth (California Department of Finance 2022, UC Office of the President 2023). Other drivers include ongoing growth in research and healthcare activities, which are key elements of UC San Diego's mission. Research enterprises require ongoing investments in infrastructure and modern facilities, in addition to faculty and staff to support the University's research programs.

Increased enrollment growth rates, in addition to increased staff growth due to the academic, research, administrative, and UC Health program needs, has prompted the need to reassess the future population and development projections of the adopted 2018 LRDP and accompanying EIR. Both campus population and anticipated space needs are now projected to grow beyond levels assumed in the 2018 LRDP and an update is being prepared to better align with the university's long-term Strategic Plan and ensure that physical plans remain solidly based on academic, research, and public service program goals. The proposed Update to the 2018 LRDP SEIR (also referred to as "Update" or "proposed project"; UC San Diego 2024a) also would make related modifications to the

land use plan that support the refreshed long-term development program and extend the planning horizon year from 2035 to 2040.

The proposed Update to the 2018 LRDP plans for projected campus growth up to approximately 36.2 million GSF of building space and a total campus population of 96,300 (including students, staff, and faculty) at the La Jolla campus by the 2040-2041 academic year, the approximate planning horizon established by the Update wherein the campus can feasibly forecast its growth. The proposed Update is not a new plan but would be an amendment to the adopted 2018 LRDP. The primary goals, objectives, and principles of the 2018 LRDP would remain relevant and consistent with the proposed Update.

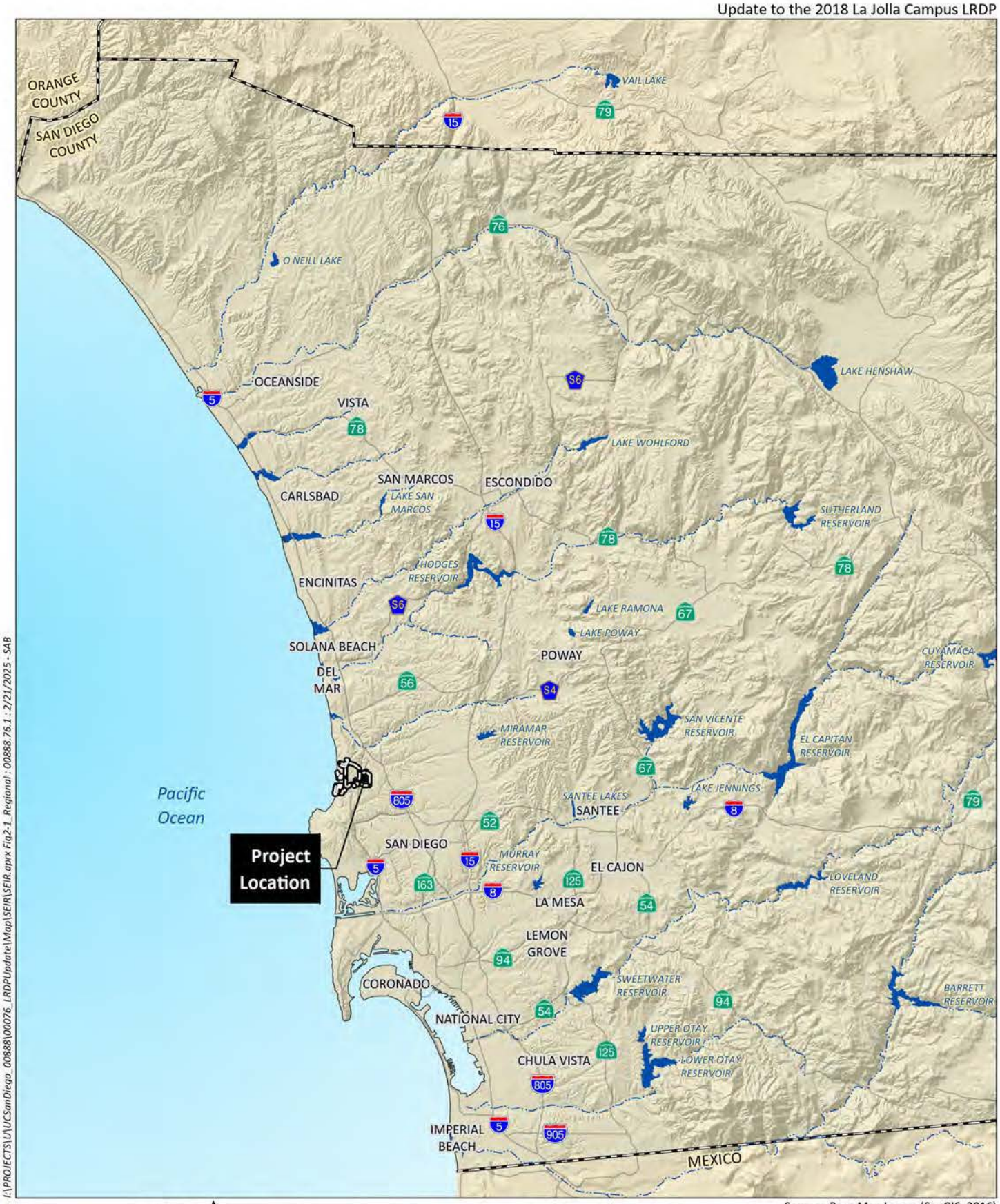
The Update to the 2018 LRDP would be processed as Amendment #1 to the 2018 LRDP, subject to review and approval by The Regents. This SEIR has been prepared in compliance with the procedural and substantive requirements of CEQA to address the potential new or substantially more severe environmental impacts resulting from implementing the Update to the 2018 LRDP as well as changed conditions since the 2018 LRDP EIR was prepared. The assumptions that form the basis of the updated population and development growth projections that are used in the preparation of this SEIR are summarized in the UC San Diego La Jolla Campus 2018 LRDP Amendment #1: Updated Growth Projections Background and Assumptions Memorandum (UC San Diego 2024a). Future individual construction projects carried forward to implement the Updated LRDP would be evaluated for general conformity with the proposed Update to the 2018 LRDP and compliance with CEQA prior to being considered for approval. Additional details on the LRDP implementation process are contained in Section 2.6, LRDP Implementation, of this Chapter.

2.2 PROJECT LOCATION

The UC San Diego La Jolla campus is located adjacent to the communities of La Jolla and University City, within the northwest portion of the City of San Diego (see Figure 2-1, *Regional Location*). UC San Diego's campus is generally composed of three distinct, but contiguous, geographical areas: the Scripps Institution of Oceanography (SIO) portion of the campus (178.7 acres), the western area of the campus (West Campus; 635.7 acres), and the eastern area of the campus (East Campus; 265.7 acres). The East and West Campuses are bisected by Interstate 5 (I-5) but are internally connected via two bridges. The La Jolla del Sol housing complex (12 acres) is located southeast of these larger geographical areas and is not contiguous to the campus. Also included in the 2018 LRDP are the beach properties, consisting of the Audrey Geisel House and an adjacent coastal canyon and beachfront parcel (25.8 acres), and the Torrey Pines Gliderport, Torrey Pines Center and Torrey Pines Court (41 acres). In total, the 2018 LRDP addresses campus properties that encompass a total of approximately 1,159 acres in La Jolla, California (Figure 2-2, *Campus Aerial Photograph*). The Update to the 2018 LRDP involves land use redesignations within West and East Campus and SIO, and increased growth within the West and East Campus areas (see Figure 2-3, *Updated Land Use Map*, and Figure 2-4, *Open Space Preserve Proposed Boundary Updates*).

2.2.1 SCRIPPS INSTITUTION OF OCEANOGRAPHY

The SIO portion of the campus is located west of Torrey Pines Road and includes a span of approximately 3,000 feet of ocean frontage. SIO was founded prior to the formation of UC San Diego and became part of the UC system in 1913. SIO is one of the oldest, largest, and most important centers for atmospheric, earth, environmental, marine, and space science research, graduate training, and public service in the world. The SIO portion of the campus referred to in this



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0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 2-1



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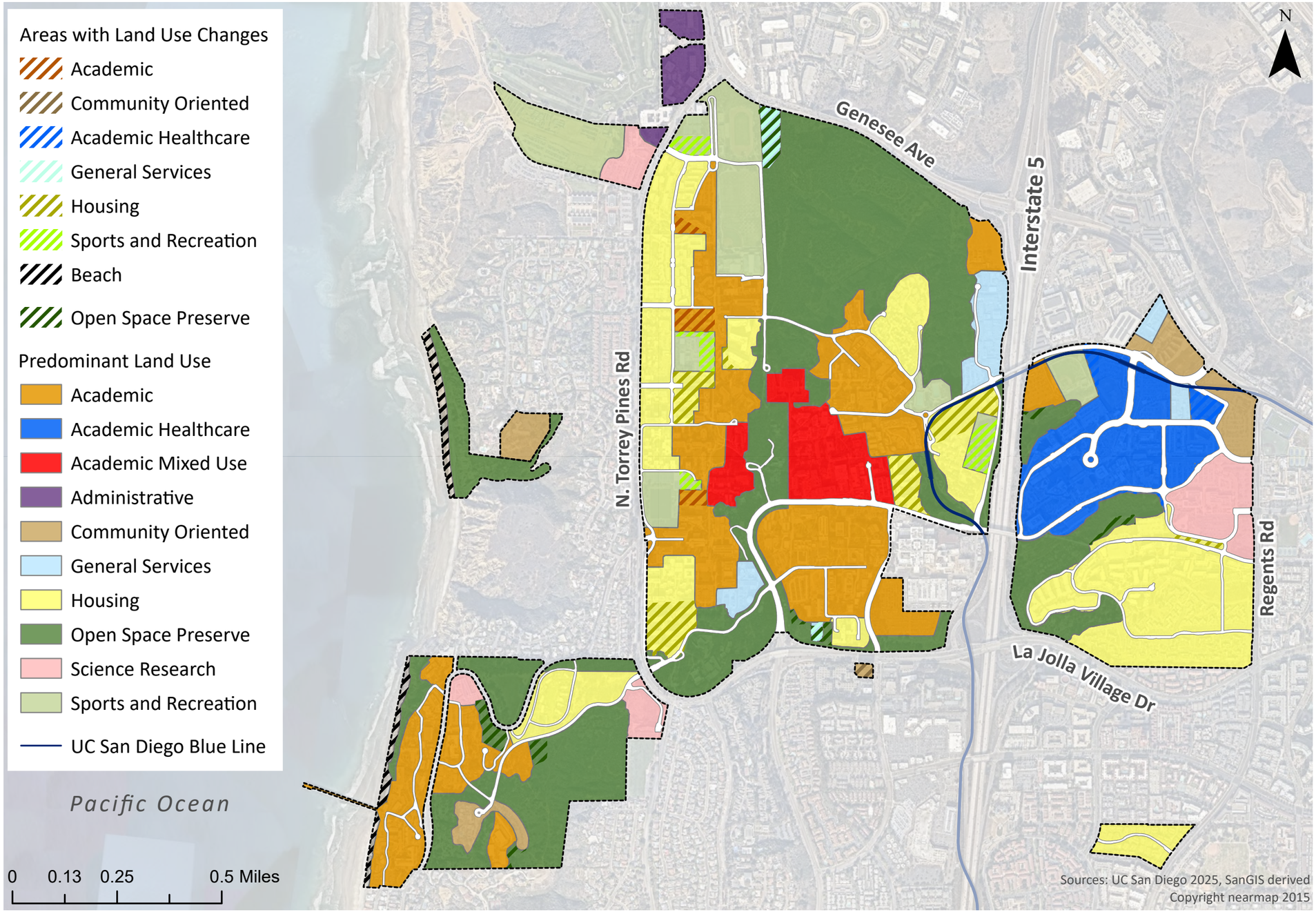
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Source: Aerial (SanGIS, 2023)

HELIX Environmental Planning

Campus Aerial Photograph

Figure 2-2

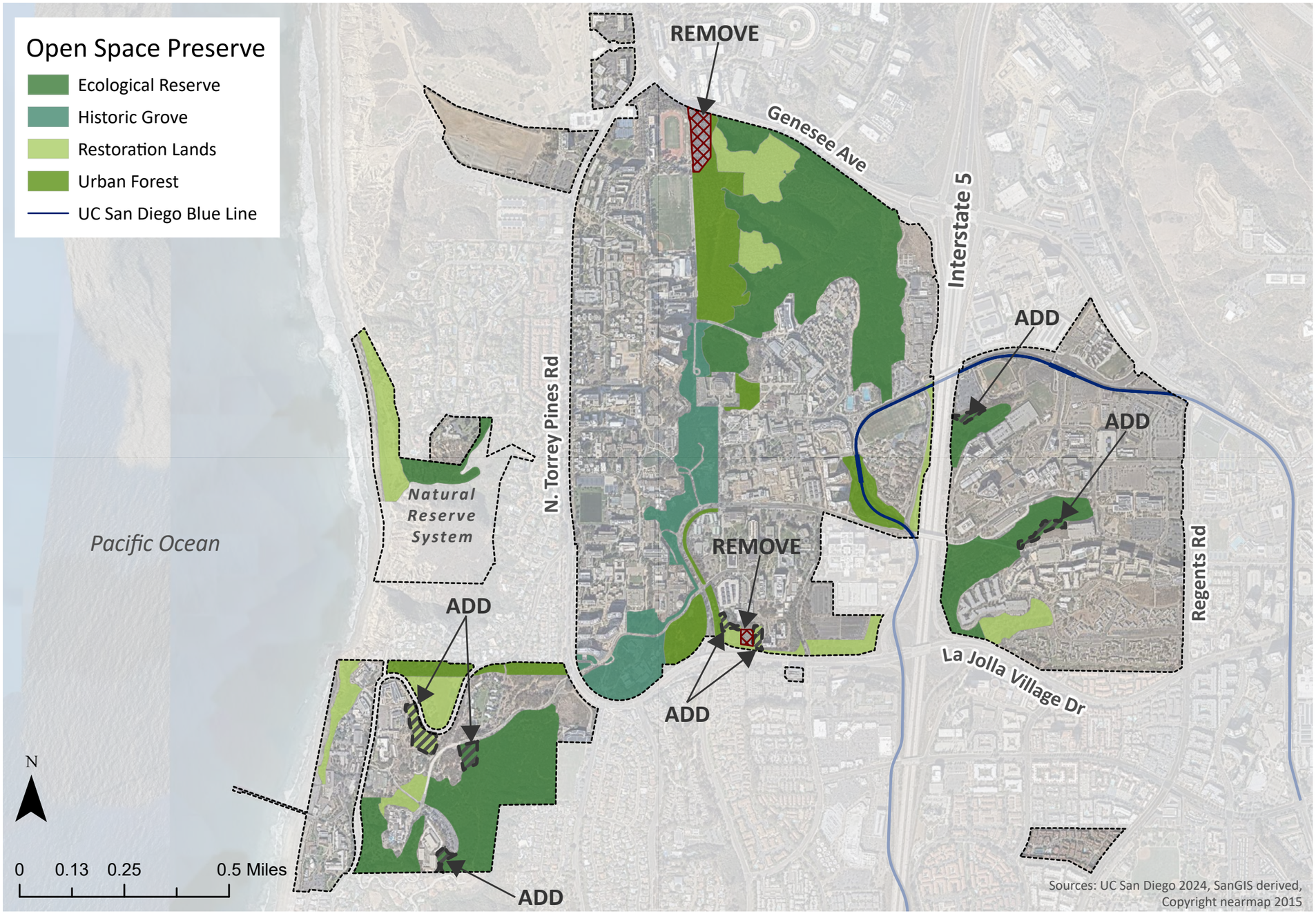


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HELIX Environmental Planning

Updated Land Use Map

Figure 2-3



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HELIX Environmental Planning

Open Space Preserve Proposed Boundary Updates

Figure 2-4

document includes numerous facilities located along the ocean to the west of La Jolla Shores Drive, as well as the hillside to the west of Torrey Pines Road; therefore, the SIO area also contains the Birch Aquarium at Scripps, Coast Apartments (student housing), other academic and research buildings, and surrounding undeveloped areas. Approximately 1 million GSF of building space exists in SIO. As discussed in Section 2.4.1, minor land use redesignations are proposed within SIO under the Update to the 2018 LRDP, but the development intensity would remain the same as evaluated in the 2018 LRDP EIR. Development at SIO is constrained by steep slopes, especially east of La Jolla Shores Drive. A dominant topographic feature is SIO Canyon, a deep coastal canyon that originates southeast of the Coast Apartments on Expedition Way and runs south to the campus property line. At SIO, elevations range from over 400 feet above mean sea level (AMSL) in the northeastern corner to almost at sea level along the southwestern border.

2.2.2 WEST CAMPUS

The West Campus, where UC San Diego's General Campus and Health Sciences schools are located, is bordered by Genesee Avenue on the north, La Jolla Village Drive on the south, North Torrey Pines Road and City of San Diego property on the west, and I-5 on the east. The Veterans Administration (VA) Medical Center occupies the southeast corner of this area on land owned by the federal government. Following certification of the 2018 LRDP EIR, a 0.9-acre parcel within an existing commercial center south of West Campus was acquired by UC San Diego for the development of the project at 8980 Villa La Jolla Drive, increasing the total acreage of the West Campus from 634.8 to 635.7 acres (UC San Diego 2021).

The West Campus is the largest and most developed of the three areas of the campus with approximately 15 million GSF of existing building space and an additional approximately 1 million GSF planned for development under the 2018 LRDP. All of the eight undergraduate colleges and a comprehensive array of academic, research and professional programs that offer both undergraduate and graduate teaching are also located on this portion of the campus. In addition, the West Campus includes libraries, theaters, student activities, administrative, sports/recreational, housing, dining, central utilities plant, campus services, and parking facilities.

The north central portion of the West Campus, north of Voigt Drive, remains relatively undeveloped. The area contains two large canyons with an extensive eucalyptus grove on the western perimeter. Native vegetation on the slopes of these canyons has remained relatively undisturbed. The eucalyptus grove forms an almost continuous band stretching from Genesee Avenue on the campus's northern boundary, to La Jolla Village Drive on the southern edge, and west along the northern edge of SIO. The remainder of the West Campus is mostly developed. Topography is characterized by a ridge running north-south (approximately the location of the linear pedestrian walkway that aligns with the ridge, called Ridge Walk) that is 900 feet east of North Torrey Pines Road and is situated at over 400 feet AMSL. The two large canyons in the northeastern corner of this portion of the campus drop down from this ridge to elevations below 200 feet AMSL.

2.2.3 EAST CAMPUS

The East Campus, where many of UC San Diego's public-oriented programs are located (including UC San Diego Health La Jolla and The Preuss School) is separated from the West Campus by I-5. In addition to I-5 on the west, the approximate boundaries of the eastern area consist of Voigt Drive and Genesee Avenue on the north, privately owned condominiums along La Jolla Village Drive to

the south, and Regents Road on the east. This portion of campus also contains the Science Research Park (approximately 23-acre innovation district for corporate, non-profit foundation, and academic partnerships), Health Sciences research facilities, parking facilities, electrical substations, and recreation and sport uses.

Topography is characterized by a mesa that covers the entire East Campus, at elevations generally ranging from approximately 320 to 350 feet AMSL; with the exception of the three finger canyons, which have elevations generally ranging from 275 to 315 feet AMSL. The finger canyons contain some riparian habitat that extends into the area from the I-5 corridor and provides topographic relief from the mesa that surrounds the canyons. The freeway corridor lies between and below the West and East campuses in a deep corridor formed by the steep slopes along the highway right-of-way.

2.3 PROJECT OBJECTIVES

Similar to the 2018 LRDP, the fundamental purposes of the Update to the 2018 LRDP for the UC San Diego campus are to:

- Bring UC San Diego's long range land use planning up to date in light of changes in the economic, academic, and environmental landscape since adoption of the 2018 LRDP;
- Equip the campus with a broad, coherent, and adaptable development framework to achieve UC San Diego's program goals with regard to the UC research, public-service and teaching mission; and
- Provide a basis for future decisions concerning land uses and capital projects for the La Jolla campus.

The key project objectives of the proposed Update to the 2018 LRDP are described below and are consistent with the 2018 LRDP objectives presented in Section 2.3, LRDP Objectives, of the 2018 LRDP EIR. Projected growth has been updated in Objective 1 to account for the increased campus development projections proposed with the Update to the 2018 LRDP. Objective 1 has also been refined to address life safety and maintenance requirements for existing, aging buildings on campus to ensure compliance with the updated UC Sustainable Practices Policy and the 2024 UC Seismic Safety Policy, and continuing the 2018 LRDP goal to redevelop lower density and under-utilized sites such as older, low-density housing. The Seventh and Eighth Colleges anticipated under the 2018 LRDP and previously outlined in Objective 2 were implemented; therefore, that objective has also been updated to reflect the need to maintain and support the unique undergraduate colleges system within the La Jolla Campus. Objective 3 was refined to reference the variety of long range studies that guide the physical development of the campus. Finally, with the completion of the Mid-Coast Trolley project in 2021 and the focus in the 2018 LRDP on implementing Transportation Demand Management (TDM) programs to reduce travel demand, Objective 6 has been refined to reference the "existing" San Diego Trolley light-rail transit station at Pepper Canyon and Objective 10 has been refined to describe continued enhancement of multi-modal connections and TDM programs as part of the Update.

1. Accommodate projected growth and address life-safety and deferred maintenance of existing buildings by demolishing approximately 1.1 million GSF and providing approximately 8.3 million GSF of new facilities needed to expand academic and non-

academic programs in support of the UC mission and its commitment to excellence in teaching, research and public service;

2. Maintain and support UC San Diego's unique undergraduate college system within the larger University setting to provide undergraduate students with personalized academic services and close-knit intellectual and social environment outside of their academic department;
3. Locate buildings on campus in accordance with the character, scale, and design goals expressed in the Master Planning Studies, Neighborhood Planning Studies, previous LRDPs, and the LRDP's guiding principles and its required elements;
4. Site future development to allow for the co-location and strengthening of campus programs, facilities, and activities, to continue the exchange of ideas between academics and scientists, and to create synergy between shared resources and services;
5. Activate and enliven the campus through strategic mixed-use and transit-oriented development, improved public spaces, expanded campus services, and additional on-campus housing to facilitate a living-learning campus environment;
6. Complete the redevelopment of the University Center on West Campus as a walkable "town center" featuring a mix of uses, urban densities, and pedestrian-activated ground floors, with connections to adjacent neighborhoods and the existing San Diego Trolley light-rail transit station at Pepper Canyon;
7. Provide housing for approximately 65 percent of the eligible student population by constructing new higher-density units and replacing aging low-density units while taking into account affordability, financial feasibility, physical site constraints, and campus character;
8. Develop new faculty and staff housing to provide affordable options and remain competitive with peer academic institutions in attracting top talent;
9. Expand and enhance research and training facilities and core services at UC Health in support of the region's only academic medical center;
10. Enhance multi-modal connections and continue to provide TDM programs to optimize trip reduction benefits of the light rail transit system, reduce automobile commuting, and coordinate with regional transportation programs;
11. Minimize environmental impacts through sustainable development practices related to campus planning, building siting, design, construction and operations; and
12. Recognize the importance of campus open spaces that form a balance with the built environment and continue to be responsible stewards of campus natural and biological resources.

2.4 PROJECT DESCRIPTION

The proposed Update to the 2018 LRDP provides a blueprint for project development that would be necessary to accommodate continued campus growth projected through the 2040 planning horizon. The physical planning framework and land use plan for the proposed Update to the 2018 LRDP is generally consistent with the 2018 LRDP. The land use plan and development program are being updated to address the future anticipated campus population and development needs that have been refined since adoption of the 2018 LRDP. The Update to the 2018 LRDP would update

the previous population growth and development projections and extend the planning horizon year from 2035 to 2040. A comparison of the 2018 LRDP and proposed Update is provided below, followed by a summary of the student enrollment and campus population projections, program development updates, and refinements to the land use plan.

2.4.1 COMPARISON OF 2018 LRDP AND PROPOSED UPDATE

The key differences between the current 2018 LRDP and proposed Update are summarized below and further described in the following sections.

- The Update to the 2018 LRDP proposes minor changes to the 2018 LRDP predominant land use designations on the West Campus. All land use categories (e.g., Academic, Academic Healthcare, Academic Mixed-Use, Administrative, Community Oriented, General Services, Housing, Open Space Preserve, Science Research, and Sports and Recreation) would remain the same as the 2018 LRDP. Table 2-1, *Land Use Category Comparison*, identifies the acreages and percentages of each land use category for the adopted 2018 LRDP compared to what is proposed under the Update to the 2018 LRDP. Figures 2-3 and 2-4 depict the primary land use changes, as summarized below:
    - Additional General Services use areas within existing Open Space Preserve (Urban Forest and Restoration Lands);
    - Minor modifications to Academic, Housing, and Sports and Recreation categories;
    - The addition of a Community Oriented use with the inclusion of the completed project at 8980 Villa La Jolla Drive; and
    - Added areas of Open Space Preserve within East Campus, West Campus, and SIO.
- The Update to the 2018 LRDP projects an increase in land use development intensity compared to the projections outlined in the 2018 LRDP. The increased density would occur within the West and East campuses, resulting in an anticipated increase in mass and height of future development in these locations. To accommodate this growth, additional utility and infrastructure upgrades, such as an electrical substation and potential wastewater treatment plant, would be implemented as determined necessary to support the increased development.
- The Update to the 2018 LRDP acknowledges the completion of the Mid-Coast Trolley project and two new stations on the West and East Campuses.
- The Update to the 2018 LRDP anticipates an enrollment of 56,000 students and a total campus population of approximately 96,300 persons by 2040, whereas the 2018 LRDP identified a projected enrollment of 42,400 students and a total campus population of approximately 65,600 persons by 2035.
- The Update to the 2018 LRDP would accommodate the development of up to approximately 36.2 million GSF of academic and support space as compared to 27.9 million GSF academic and support space projected in the 2018 LRDP.

Specific to the three geographic areas of campus, the following primary land use modifications are proposed in the Update to the 2018 LRDP land use plan:

- **West Campus** – Boundary adjustments and minor land use refinements to several areas of Academic, Academic Mixed Use, Housing, and Sports and Recreation land uses would be

made to better reflect existing conditions and modifications in land use plans. Two areas within existing Open Space Preserve land use would be redesignated as General Services. To accommodate part of this loss, an area currently designated as Academic would be redesignated as Open Space Preserve. A new area of Community Oriented land use would also be added to the campus (8980 Villa La Jolla facility). In addition, the updated land use plan incorporates an adjustment to a portion of the campus loop road (Theatre District Drive) that was constructed in 2021. See Figures 2-3 and 2-4 for proposed boundary adjustments within the West Campus.

- **East Campus** – Areas of existing Sports and Recreation and Community-Oriented land uses would be redesignated to Academic Healthcare land use (see Figure 2-3). Small areas of Academic and Housing land uses would be redesignated as Open Space Preserve (see Figure 2-4).
- **SIO** – Three areas of existing Academic land uses would be redesignated as Open Space Preserve. Areas formerly designated as Open Space Preserve and Academic have been refined to be labeled as "Beach." No other changes to the land use plan or development program are proposed. See Figure 2-4.

Table 2-1
Land Use Category Comparison

Land Use Category	Adopted 2018 LRDP Acreages	Percentage of Total Campus Acreage	Update to the 2018 LRDP Acreages	Percentage of Total Campus Acreage
Open Space Preserve	335	28%	338	29%
Academic	245	21%	211	18%
Housing	225	20%	217	19%
Sports and Recreation	93	8%	88	8%
Academic Healthcare	76	7%	69	6%
Science Research	50	4%	38	3%
Academic Mixed Use	44	4%	41	4%
Community-Oriented	40	4%	32	3%
General Services	25	2%	29	3%
Administrative	25	2%	13	1%
Roads	NA	NA	68	6%
Beach	NA	NA	15	1%
Total Acreage	1,158		1,159	

Source: UC San Diego 2024b.
Notes: Percentages may not sum to 100 percent due to rounding. Roads and Beach areas were not previously calculated separately for the 2018 LRDP, but were mapped with adjacent land use types and are therefore listed as "NA" or not applicable. The additional acreage for the Update to the 2018 LRDP reflects the addition of the 8980 Villa La Jolla site into the campus boundary.

As with the adopted 2018 LRDP, this Update is neither an enrollment plan or mandate nor an implementation plan. The LRDP contains a framework of goals, principles and development objectives to accommodate an identified level of campus population and physical development. Enrollment and staff decisions and the implementation of specific capital projects are guided by other University and state planning policies and documents, and are influenced by multiple factors including state and University funding decisions, demographics, public policy, and other factors external to the campus and LRDP process. The projected enrollment and development projections assumed in the Update to the 2018 LRDP are summarized below.

2.4.2 CAMPUS POPULATION GROWTH PROJECTIONS

2.4.2.1 STUDENT ENROLLMENT

Since implementation of the 2018 LRDP, the total number of undergraduate, graduate, professional, and health sciences students at UC San Diego grew by 9,550 students from 32,850 in fall quarter 2015 to 42,400 in fall quarter 2023 (UC San Diego 2024a). As stated previously, the projected student enrollment is being updated as part of this Update to reflect the increases in student population growth since adoption of the 2018 LRDP and anticipated growth through the 2040 horizon year. As shown in Table 2-2, *Total Projected Student Enrollment*, student enrollment would increase from 42,400 students projected through 2035 in the 2018 LRDP to 56,000 students projected through 2040, a difference in projected enrollment of 13,600 students. The projected growth assumes that the proportion of graduate students would achieve a desired ratio of approximately 25 percent of the total student population, also noting that for the purposes of this Update, clinical residents at the medical center are included in the staff category and not considered to be part of the student population.

Table 2-2
Total Projected Student Enrollment (rounded)

Existing Baseline (Fall 2015)	Existing at Update (Fall 2023)	Adopted 2018 LRDP Enrollment (Fall 2035)	Proposed Updated Enrollment (Fall 2040)	Difference in Projected Enrollment
32,850	42,400	42,400	56,000	13,600

Sources: UC San Diego 2024a.
Note: Enrollment is expressed in terms of headcount. Fall headcount enrollment is generally a conservative estimate of annual, on-campus enrollment levels**.** Specifically, fall enrollment has historically been higher compared to winter and spring quarters, and the above projections do not exclude students who are enrolled part time or are not physically located on campus. Fall enrollments are published annually by UC Information and Research Center and represent headcount identified as of the third week of the fall term.

Student enrollment numbers are reported systemwide using different methodologies for different purposes. The UC Information and Research Center annually publishes fall enrollment levels systemwide, which reflects headcount enrollment as of the third week of the fall term. Historically, fall-term enrollment has been higher than other quarters (or semesters) at all campuses, including UC San Diego as students graduate, withdraw, or otherwise leave the University throughout the academic year. Enrollment is also tabulated for budget planning and state reporting purposes as a three-quarter (or two-semester) average headcount and/or average full time equivalent, excluding self-supporting programs. Summer enrollment is excluded from these averages because it is substantially lower than enrollment during the academic year, as are academic and other University-affiliated programming. Generally, three-quarter average headcount (fall, winter, and spring) is more representative of the number of students actively on-campus over the course of a year.

2.4.2.2 CAMPUS POPULATION

Since implementation of the 2018 LRDP, the total campus population (i.e., students, faculty/researchers, and staff) has increased from 48,850 (Fall 2015) to 65,050 (Fall 2023), including approximately 42,400 students and 22,650 faculty and staff. In consideration of state directives such as the multi-year compact between the Governor and the UC to advance student-

focused goals (California Department of Finance 2022, UC Office of the President 2023), applicant demand, and campus capacity and consultation between UC San Diego's Institutional Research department and the Chancellor's Office, updated campus population projections through the year 2040 have been developed for the proposed Update to the 2018 LRDP. Updated estimated student, staff, and faculty campus population projections are shown in Table 2-3, *Total Projected Campus Population Growth Comparison*. As shown, the student population is projected to increase to 56,000 by the 2040 horizon year. This is an increase of 13,600 compared to what was projected in the approved 2018 LRDP for the year 2035. Staff and faculty population would increase to 40,300, an increase of 17,100 compared to the adopted 2018 LRDP projected population of 23,200. The total population is projected to be 96,300 in 2040, an increase of 30,700, or approximately 45 percent, over what was projected in the 2018 LRDP for the year 2035, with a five-year extension in the planning horizon year to 2040.

Table 2-3
Total Projected Campus Population Growth Comparison

Category	Existing Baseline (Fall 2015)	Existing at Update (Fall 2023)	Adopted 2018 LRDP Growth (Fall 2035)	Proposed Updated Growth (Fall 2040)	Difference in Projected Growth
Students	32,850	42,400	42,400	56,000	13,600
Staff & Faculty	16,000	22,650	23,200	40,300	17,100
Total Population	**48,850**	**65,050**	**65,600**	**96,300**	**30,700**

Sources: UC San Diego 2018b, 2024a.
Note: Enrollment is expressed in terms of fall headcount. Fall headcount enrollment is generally a conservative estimate of annual, on-campus enrollment levels. Specifically, fall enrollment has historically been higher compared to winter and spring quarters, and the above projections do not exclude students who are enrolled part time or are not physically located on campus. Fall enrollments are published annually by UC Information and Research Center and represent headcount identified as of the third week of the fall term.

The update to the anticipated campus growth projections is consistent with the goals set forth in the UC San Diego Strategic Plan and other UC enrollment and housing initiatives. Staff and faculty population is measured by total headcount, adjusted to a full time equivalent. Using adjusted headcount instead of daily population estimates represents a conservative approach for this analysis. On-campus population figures are not adjusted to reflect the fact that not all students, faculty, and staff are on campus simultaneously on any given day due to variations in class and teaching schedules, remote or hybrid-remote work/courses, leaves of absence, vacations, sabbaticals, etc. As a result, the actual number of enrolled and employed individuals on campus on any given weekday would likely be less than those presented in Tables 2-2 and 2-3. Currently, many campus employees do not work on campus on a daily basis (e.g., five days a week) and are on hybrid schedules working remotely one to five days per week. While the reduced proportion of staff working on campus daily is notable, it is not factored into the campus population projections as the proportions of hybrid work schedules could change over the anticipated life of the Update to the 2018 LRDP through the 2040 horizon year.

In addition to the students, faculty, and staff who study and work at UC San Diego, on any given day there are other individuals on campus, including patients, visitors, vendors, construction workers, and employees of other affiliated entities. As the campus continues to pursue private-public partnership projects that could bring staff not employed directly by UC San Diego to the campus (for example, the Science Research Park), this population projection is expected to include both UC San Diego employees and employees of affiliates or private companies physically work on campus locations full time. The proposed 2040 population projection includes estimates of these on-

campus private-public partnership staff populations, such as those that would work at the Science Research Park facilities. Methodologies for projecting faculty and staff populations are provided in the UC San Diego La Jolla Campus 2018 LRDP Amendment #1: Updated Growth Projections Background and Assumptions Memorandum, as developed by the Campus Planning office in consultation with the Chancellor's Office and other campus stakeholders (UC San Diego 2024a). Note that potential environmental effects from the Update to the 2018 LRDP are primarily analyzed for the regular session of the academic calendar, which consists of the fall, winter, and spring quarters. The UC San Diego campus operates 365 days a year and includes summer sessions. Historically, fall-term enrollment has been higher than other quarters (or semesters) at all campuses, including UC San Diego, as students graduate, withdraw, or otherwise leave the University throughout the academic year. Enrollment is also tabulated for budget planning and state reporting purposes as a 3-quarter (or 2-semester) average headcount and/or average Full Time Equivalent, excluding self-supporting programs. Summer enrollment is excluded from these averages because it is substantially lower than enrollment during the academic year, as are academic and other University-affiliated programming. Generally, the average headcount is more representative of the number of students actively on campus over the course of a year. Accordingly, the environmental effects of the regular session would be of greater magnitude due to the larger population on campus.

2.4.3 PROGRAM DEVELOPMENT

2.4.3.1 DEVELOPMENT PROJECTIONS

New programs and development would be necessary to accommodate the anticipated student enrollment and campus population growth described in this Update to the 2018 LRDP SEIR. This includes expansion of UC San Diego's academic, clinical, housing, administrative, community oriented, and service programs. Campus growth would be accommodated through replacement of obsolete facilities and underutilized areas such as surface parking lots, repurposing existing buildings, and construction of new facilities. Table 2-4, *Campus Development Projections: Comparison of Gross Square Feet by Location*, depicts total campus space by geographical area, including projects currently in planning, design, or construction. The estimates of the development capacity of the campus presented in Table 2-4 are based on the growth potential for the campus and were derived by considering a) program objectives, b) identifying logical expansion, redevelopment, and development areas, c) consistency with Campus Master Planning and Neighborhood Planning Studies, and d) assuming reasonable densities to provide future flexibility as capital opportunities arise. As part of the planning process, UC San Diego Campus Planning identified potential areas for new development and redevelopment that could accommodate the proposed buildout projections shown in Table 2-4, Table 2-5, *Potential Areas of New Development and Redevelopment,* and Figure 2-5, *Potential Development Areas* (refer to Table 2-5 for site identification). Potential areas of new development are identified on sites that are not currently developed with structures and potential areas of redevelopment are identified on sites where the existing structure(s) would be demolished, and a new structure(s) would be constructed in its place. The proposed LRDP Update does not require any specific development projects on any site, and demolition of existing structures may occur in advance and independent of any identified and/or funded replacement project. The purpose of the potential development assumptions is to illustrate a land use program that would accommodate the proposed development projections. The identified development areas provide possible options that UC San Diego has to accommodate planned growth and changes.

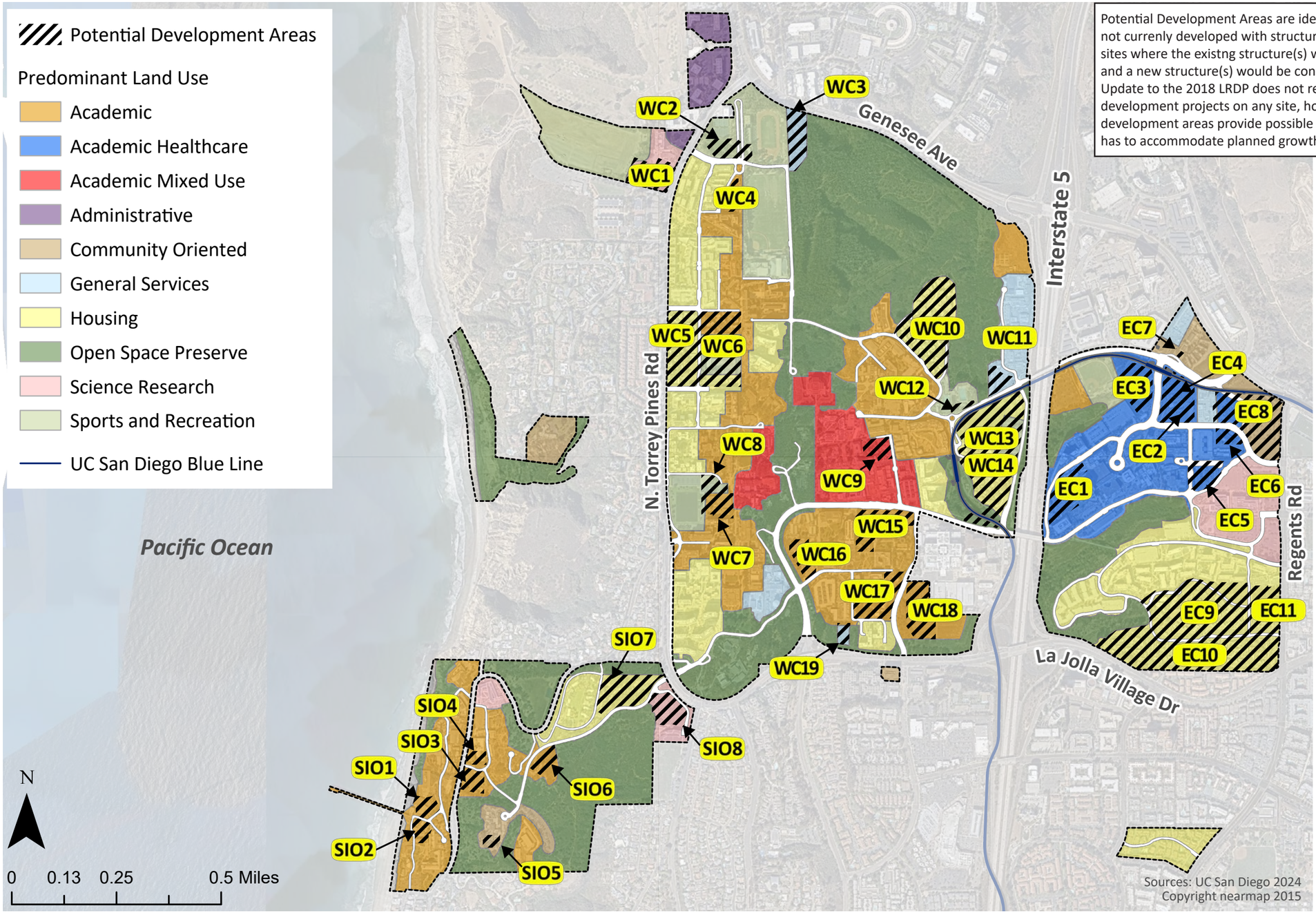
Potential Development Areas

Predominant Land Use

- Academic
- Academic Healthcare
- Academic Mixed Use
- Administrative
- Community Oriented
- General Services
- Housing
- Open Space Preserve
- Science Research
- Sports and Recreation

UC San Diego Blue Line

Potential Development Areas are identified on sites that are not currenly developed with structures or on redevelopment sites where the existng structure(s) would be demolished, and a new structure(s) would be constructed in its place. The Update to the 2018 LRDP does not require any specific development projects on any site, however, the identified development areas provide possible options that UC San Diego has to accommodate planned growth.



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The projected campus development considers that the UC Regents have consistently encouraged campuses to optimize development sites, including associated increases in Floor Area Ratios (FAR) of university properties. Historical growth and projects developed under the current 2018 LRDP to date were also considered, along with near-term and mid-term future projects that are contemplated in UC San Diego's capital improvements program and the Capital Financial Plan.

As shown in Table 2-4, UC San Diego anticipates the overall campus building space could increase from the previous projections of approximately 27.9 million GSF by 2035 to approximately 36.2 million GSF by 2040. This represents a projected net increase of approximately 8.3 million GSF compared to the growth identified in the 2018 LRDP, considering demolition of approximately 1.1 million GSF of existing facilities that is projected to be required (net new development). West Campus would include approximately 21.9 million GSF of development by 2040, and East Campus would include approximately 11.7 million GSF of development. Growth projected for SIO would not increase from levels identified in the 2018 LRDP, with no additional development assumed in the Update. Overall campus land use development would increase by about 30 percent compared to what was analyzed in the 2018 LRDP.

Table 2-4
Campus Development Projections: Comparison of Gross Square Feet by Location

Campus Location	Adopted 2018 LRDP GSF (Fall 2035)	Proposed Additional Updated GSF (Fall 2040)	Total Projected GSF (Fall 2040)
West Campus	16,046,000	5,820,200	21,866,200
East Campus	9,358,300	2,367,100	11,725,400
Scripps Institution of Oceanography	2,011,000	0	2,011,000
Nearby Properties	471,000	105,000	576,000
Total Space	**27,886,300**	**8,292,300**	**36,178,600**

Sources: UC San Diego 2018b, 2024a.
Notes:

- Nearby properties' increase due to incorporation of existing 8980 Villa La Jolla Drive project into the UC San Diego Campus.
- Approximately 8.3 million GSF would be attributable to growth under the Update to the 2018 LRDP, while 1.1 million GSF of on-going development would occur in the near-term as approved under the 2018 LRDP.
- Total GSF is the net development on campus after taking into account approximately 1.1 million GSF of building demolitions proposed under the Update to the 2018 LRDP.

Development projections utilized assumptions for gross square footage based on use, site capacity, typical square footage per bed ratios, program needs, etc. Potential new development expected and captured in the projected growth increase include:

- New hospital in-patient bed tower on the East Campus;
- Additional clinical and research program growth on the East Campus;
- Increased density and opportunities to redevelop lower density areas for future student living-learning housing neighborhoods on the West Campus, including within the Pepper Canyon East District, the area previously occupied by Extended Studies and Marshall College (along North Torrey Pines Road and Scholars Drive North), and Warren College site housing areas;
- Increased density for future student housing redevelopment in the Central/South Mesa Housing Neighborhood of the East Campus;

- Recreation program expansion and redevelopment needs on the West Campus;
- Hotel and conference center on the West Campus;
- Preserving and increasing development capacity for academic and research growth on the West Campus;
- Increased electrical substation space to accommodate needs of decarbonization initiatives and increased utilities demand; and
- Redevelopment needs associated with the 2024 UC Seismic Safety Policy that requires an annual reduction in non-confirming square footage, and that all currently occupied SPR VI or VII rated facilities be brought into compliance no later than December 31, 2037.

As part of the proposed LRDP Update planning process, UC San Diego Campus Planning identified potential areas for new development and redevelopment that could accommodate the proposed buildout projections shown in Table 2-4. Potential areas of new development are identified on limited sites that are not currently developed or where a new structure could be constructed, and potential areas of redevelopment are identified on sites where the existing structure(s) would be demolished, and a new structure(s) would be constructed in its place (Table 2-5). The proposed LRDP Update does not require any specific development projects on any site. The purpose of the potential development assumptions is to illustrate a land use program that would accommodate the proposed LRDP Update buildout projections. The identified development areas provide possible options for UC San Diego to accommodate the planned growth.

The 2018 LRDP included the goal of reducing the number of students at each undergraduate college in order to enhance the student experience, and since its adoption UC San Diego has formed two additional undergraduate colleges, Seventh and Eighth Colleges, for a total of eight colleges. The Update to the 2018 LRDP does not propose to add additional undergraduate colleges but would not preclude the option to in the future. The Update to the 2018 LRDP is not a commitment to building all square footage or projects listed in Table 2-5, but rather, is a reasonably conservative estimate of what could occur to support the UC San Diego mission, population, and academic, research, and healthcare goals. It is also possible that development not currently anticipated would be proposed during the planning timeframe (through 2040) as program needs are refined.

Table 2-5
Potential Areas of New Development and Redevelopment

Site ID	Development Site	Proposed Land Use	Project Type	Existing Site GSF	Proposed Site Square Footage	Was the development site included in Adopted 2018 LRDP?	If included in Adopted 2018 LRDP are there any substantive changes?
WC1	Torrey Pines	Science Research	New Development		*150,000*	*Yes*	
WC2	North Point	Sports and Recreation	New Development		*75,000*	*Yes*	*Changed land use from Academic to Sports and Recreation*
WC3	West Campus Electrical Substation	General Services	New Development		*N/A*	*No*	
WC4	North of Rady School	Academic	New Development		*200,000*	*Yes*	
WC5	West Campus Housing 1	Housing	Redevelopment	*-128,500*	*1,100,000*	*Yes*	*Increased square footage and number of beds*
WC6	West Campus Academic Site 1	Academic	Redevelopment	*-44,000*	*250,000*	*Yes*	
WC7	West Campus Academic Site 2	Academic	Redevelopment	*-53,000*	*200,000*	*Yes*	*Increase in square footage*
WC8	Triton Recreation Center	Sports and Recreation	New Development		*200,000*	*Yes*	*Increase in square footage*
WC9	University Center	Academic	Redevelopment	*-13,722*	*300,000*	*Yes*	*Increase in square footage*
WC10	West Campus Housing 2	Housing	Redevelopment	*-455,000*	*1,320,000*	*No*	
WC11	Campus Services South	General Services	New Development		*30,000*	*No*	
WC12	Canyonview Recreation Expansion	Sports and Recreation	Redevelopment	*-5,800*	*50,000*	*No*	
WC13	Pepper Canyon East Housing	Housing/Sports and Recreation	Redevelopment	*-262,000*	*2,650,000*	*Yes*	*Increased square footage, number of beds, and recreation field adjustment*
WC14	Pepper Canyon East Hotel	Community Oriented	New Development		*250,000*	*No*	

Site ID	Development Site	Proposed Land Use	Project Type	Existing Site GSF	Proposed Site Square Footage	Was the development site included in Adopted 2018 LRDP?	If included in Adopted 2018 LRDP are there any substantive changes?
WC15	Health Sciences Academic 1	Academic/Research	New Development		*125,000*	*Yes*	
WC16	Health Sciences Academic 2	Academic/Research	Redevelopment	*-44,000*	*200,000*	*No*	
WC17	Health Sciences Academic 3	Academic/Research	New Development		*250,000*	*No*	
WC18	Health Sciences Academic 4	Academic/Research	New Development		*250,000*	*No*	
WC19	Wastewater Treatment Plant	General Services	New Development		*N/A*	*No*	
EC1	Inpatient Bed Tower	Academic Healthcare	New Development	*-31,500*	*850,000*	*No*	
EC2	La Jolla Outpatient Pavilion	Academic Healthcare	New Development		*180,000*	*Yes*	*Increase in square footage*
EC3	East Campus Clinical/Research 1	Academic Healthcare	New Development		*200,000*	*No*	
EC4	East Campus Clinical/Research 2	Academic Healthcare	New Development		*200,000*	*No*	
EC5	East Campus Clinical/Research 3	Academic Healthcare	New Development		*200,000*	*Yes*	*Increase in square footage*
EC6	East Campus Clinical/Research 4	Academic Healthcare	New Development		*75,000*	*No*	
EC7	Preuss Expansion	Academic	New Development		*30,000*	*No*	
EC8	Hotel/Conference Center/Mixed-Use	Community Oriented/Academic Healthcare	New Development		*310,000*	*Yes*	
EC9	South Mesa Housing 1	Housing	Redevelopment	*-415,000*	*1,125,000*	*Yes*	*Increased square footage and number of beds*
EC10	South Mesa Housing 2	Housing	Redevelopment		*1,125,000*	*Yes*	*Increased square footage and number of beds*

Site ID	Development Site	Proposed Land Use	Project Type	Existing Site GSF	Proposed Site Square Footage	Was the development site included in Adopted 2018 LRDP?	If included in Adopted 2018 LRDP are there any substantive changes?
EC11	Regents Road Mixed-Use Staff/Faculty Housing	Housing	Redevelopment		*1,250,000*	*Yes*	
SIO1	North Pier Site	Academic/Research	Redevelopment	*-25,600*	*100,000*	*Yes*	
SIO2	South Pier Site	Academic/Research	Redevelopment	*-21,300*	*75,000*	*Yes*	
SIO3	Deep Sea Drilling Redevelopment	Academic/Research	Redevelopment	*-23,600*	*175,000*	*Yes*	
SIO4	Nierenberg Redevelopment	Academic/Research	Redevelopment	*-17,500*	*72,000*	*Yes*	
SIO5	Birch Aquarium Renovations and Expansion	Community Oriented	New Development		*15,000*	*Yes*	
SIO6	Middle Mesa	Academic/Research	New Development		*125,000*	*Yes*	
SIO7	North of Expedition Site	Housing	New Development		*300,000*	*Yes*	
SIO8	Upper Mesa	Academic/Research	New Development		*100,000*	*Yes*	

Note: The proposed Update to the 2018 LRDP does not require any specific development projects on any site. The purpose of the potential development areas is to illustrate a land use program that would accommodate the proposed Update buildout projections. The identified development areas provide possible feasible options that UC San Diego has to accommodate the planned growth.

2.4.3.2 HOUSING PROJECTIONS

The proposed Update to the 2018 LRDP continues the goal of housing up to 65 percent of undergraduate and graduate students eligible for campus housing that was identified in the 2018 LRDP (UC San Diego 2018b). Due to the projected increase in student enrollment, additional on-campus student housing is required to meet these requirements. Projected housing included in the Update to the 2018 LRDP would accommodate 65 percent of undergraduate and graduate students by 2040 (including beds to accommodate students with families) by providing approximately 38,620 beds (Table 2-6, *Total Projected Campus Housing [Beds] Growth Comparison*). Under the Update to the 2018 LRDP, total campus housing supply would increase by approximately 12,780 net new beds as compared to the 8,900 beds approved under the 2018 LRDP (5,750 of which have been constructed or are currently under construction). This level of future student housing supply includes existing housing (19,715) as of this Update, near-term projects approved under the 2018 LRDP (3,710 beds to be completed and developed with the Pepper Canyon West Housing and Ridge Walk North Living and Learning Neighborhood [LLN]), and future housing projects (net new total of 15,195) projected through 2040 (UC San Diego 2024a; Table 3). In addition, the campus would accommodate up to 1,800 one-, two-, and three-bedroom apartment units (approximately 2,500 new beds) for faculty and staff housing, already assumed under the adopted 2018 LRDP. While the campus would retain flexibility to adapt to changes in student housing needs, it is anticipated that the West Campus would continue to predominantly house undergraduates while the majority of graduate and professional student housing would be located on the East Campus.

Table 2-6
Total Projected Campus Housing (Beds) Growth Comparison

Category	Existing Beds at Update (Fall 2023)	Adopted 2018 LRDP Total Beds (Fall 2035)	Proposed Updated Total Beds (Fall 2040)	Difference in Total Projected Housing Growth
Student Beds	19,715	25,840	38,620	12,780
Faculty/ Staff Beds	610	3,110	3,110	none
Total Beds	**20,325**	**28,950**	**41,730**	**12,780**

Sources: UC San Diego 2018b, 2024a.
Notes:
- Total beds reflect the cumulative campus housing supply, including existing housing and proposed new projected beds and displacement (i.e., existing beds removed through redevelopment).
- Total student beds include some non-student beds associated with students with families.
- Total housing growth includes planned and proposed beds to be added to existing supply.
- A 1:1 bed to population ratio has been utilized regardless of the housing type.

2.4.4 ELEMENTS OF THE UPDATE TO THE 2018 LRDP

The primary purpose of the proposed Update to the 2018 LRDP is to update the previous population growth and development projections and extend the planning horizon year from 2035 to 2040. The goals, objectives, planning principles, and land use categories presented in the 2018 LRDP remain consistent. The 2018 LRDP Elements described in Section 2.4.3, 2018 LRDP Elements, of the 2018 LRDP EIR—Land Use, Landscape and Open Space, Circulation, and Utilities—largely remain the same with the proposed Update. No changes to the geographic planning areas or conceptual planning principles described in Section 2.4.4 of the 2018 LRDP EIR are proposed. Refinements to the elements presented in the 2018 LRDP are described below.

2.4.4.1 LAND USE

Land use categories and the uses permitted within them are described in Section 2.4.3.1, Land Use, of the 2018 LRDP EIR. These land use categories include Academic, Academic Healthcare, Academic Mixed-Use, Administrative, Community Oriented, General Services, Housing, Open Space Preserve, Science Research, and Sports and Recreation. No changes to the allowed uses in these land use categories are proposed in the Update to the 2018 LRDP, and no new land uses are introduced.

As summarized above in Section 2.4.1 and shown in Figure 2-3, the following primary land use modifications are proposed by the Update to the 2018 LRDP's updated land use plan.

West Campus

Areas of existing Academic, Academic Mixed Use, Housing, and Sports and Recreation land uses would be modified through boundary adjustments to support future development opportunities, provide more efficient development siting, and to better reflect existing built conditions.

New utility infrastructure required to accommodate campus growth (electrical substation and a potential new wastewater treatment plant) would be sited within existing Open Space Preserve areas (Urban Forest and Restoration Land types), requiring a change in land use in these areas to General Services. The Urban Forest type of Open Space Preserve land use category in the northern portion of the West Campus would be reduced by approximately 4 acres, and this loss would be accommodated by expanding the Open Space Preserve in the East Campus and SIO, as described in the following subsections (see Figure 2-4). The Restoration Lands area in the southern portion of the West Campus would be reduced by approximately 0.7 acres, which would be accommodated by expanding the Restoration Lands area immediately east and west of the removed site.

In addition, a new area of Community Oriented land use is added to accommodate the acquisition and development of 8980 Villa La Jolla Drive. The updated land use plan also incorporates an adjustment to a portion of the campus loop road (Theatre District Drive) that was constructed in 2021.

East Campus

An area of existing Sports and Recreation land use would be redesignated to Academic Healthcare land use to better reflect future development opportunities, and an area of Community-Oriented land use would be redesignated to Academic Healthcare to support UC San Diego Health anticipated growth, including parking facilities. Expanded Open Space Preserve (Ecological Reserve) is proposed in areas previously designated as Academic and Housing to ensure there is no net loss of overall campus Open Space Preserve acreage resulting from the proposed utility infrastructure improvements on the West Campus (see Figure 2-4). These two areas are good candidates for the Ecological Reserve type of Open Space Preserve because they contain undeveloped land containing native habitat and are adjacent to existing Open Space Preserve (Ecological Reserve) areas.

SIO

Three areas of Academic land use would be redesignated as Open Space Preserve (Restoration Lands and Ecological Reserve types) land use to ensure there is no net loss of overall campus Open Space Preserve acreage resulting from the required utility infrastructure improvements on the

West Campus (see Figure 2-4). These areas are good candidates for the Restoration Lands and Ecological Reserve types of the Open Space Preserve because they contain undeveloped land with native habitat that are adjacent to and/or surrounded by existing Restoration Lands and Ecological Reserve areas. These areas were unlikely to be developed pursuant to their previous land uses designated by the 2018 LRDP due to the presence of sensitive native habitat.

2.4.4.2 LANDSCAPE AND OPEN SPACE

With the Update to the 2018 LRDP, the University's commitment to a campus landscape that reflects its sustainable development practices and multifunctional spaces would remain. The existing 100-foot Perimeter Development Zone (PDZ) buffer along the western and southern boundaries of West Campus, and the eastern and southern boundaries of East Campus would be retained, with development in these PDZ areas reviewed by UC San Diego staff and campus committees to evaluate compatibility of site design and architecture and to avoid substantial impacts to visual character (see also Sections 3.1, Aesthetics, and 3.13, Wildfire, of this SEIR).

In addition to the information provided in Section 2.4.3.2 of the 2018 LRDP EIR, updates related to campus fire protection landscaping guidelines and refinements to campus Open Space Preserve areas are described below.

Campus Fire Protection Landscaping Guidelines

On March 25, 2024, the Campus Fire Marshal's Office (CFMO) issued Technical Bulletin/Standard Operating Procedure 2024-05 describing the minimum safeguards for protecting campus buildings and facilities exposed to the impacts of wildfires occurring in areas designated by the California Department of Forestry and Fire Protection (CAL FIRE) as Very High Fire Hazard Severity Zone areas and/or Wildland Urban Interface (WUI) areas on or adjacent to established campus lands. The guidelines were issued to require management of defensible space to eliminate fire hazards and exposure of buildings and people from wildfire intrusion into and spread through the campus. The guidelines include an approved list of acceptable plants that may be used to landscape defensible space/fuel modification zones. It also provides a procedure for reviewing alternative plant species that are on the published list where flexibility may be needed.

Open Space Preserve

The 2018 LRDP includes approximately 335 acres of Open Space Preserve on the campus that consists of four types of open space that contain both natural and manmade landscapes: Ecological Reserve, Restoration Lands, Historic Grove, and Urban Forest. The description of these open space types designated on campus and their allowable uses are described in Section 2.4.3.2, Landscape and Open Space, of the 2018 LRDP EIR under Open Space Preserve, and Sections 3.4.4 and 3.6.6 of the LRDP. Figure 2-4 illustrates where these various open space areas occur on campus. Refinements to the Open Space Preserve Areas presented in the 2018 LRDP are described below, and the Update to the 2018 LRDP would increase the acreage of the Open Space Preserve to approximately 338 acres.

- **Ecological Reserve** – Approximately 179 acres of Ecological Reserve lands are designated in the Open Space Preserve on campus in the 2018 LRDP. These lands would remain unchanged with the Update to the 2018 LRDP. Expansion of existing Ecological Reserve areas is proposed with the Update to offset potential development with other Open Space

Preserve areas, resulting in an increase in this Open Space Preserve type of approximately 4 acres. This would result in a total of 183 acres of Ecological Reserve campuswide.

- **Restoration Lands** – Approximately 59 acres of Restoration Lands are designated in the Open Space Preserve on campus in the 2018 LRDP. As with the 2018 LRDP, development in Restoration Lands would be restricted but may move forward if the proposed improvements provide a net benefit to the Open Space Preserve. Expansion of Restoration Lands is proposed under the Update to offset potential development of a potential wastewater treatment plant with other areas that are good candidates for this category of Open Space Preserve, resulting in an increase of approximately 4 acres. This would result in a total of 63 acres of Restoration Lands campuswide.
- **Historic Grove** – Approximately 40 acres of Historic Grove designated in the Open Space Preserve on campus in the 2018 LRDP would remain. Future expansion of existing facilities and new facilities would be limited in the Historic Grove and, wherever possible, efforts would be made to reduce building footprints and restore the eucalyptus groves to enhance the integrity of this open space. Development of suitable bicycle and pedestrian paths in the Historic Grove would still be encouraged.
- **Urban Forest** – The approximately 56 acres of Urban Forest designated in the 2018 LRDP are proposed to be reduced to 52 acres, with an approximately 3.5-acre area south of Genesee Avenue and northeast of Hopkins Drive proposed to be redesignated as General Services for the potential development of an electrical substation. Similar to the 2018 LRDP, future expansion of existing facilities and new facilities would be limited in these areas and, wherever possible, efforts would be made to reduce building footprints and replenish the Urban Forest to enhance the integrity of this open space. Development of suitable bicycle and pedestrian paths in the Urban Forest would still be allowed.

Open Space Management Program

The UC San Diego Open Space Management Program that is currently implemented for the Ecological Reserve would continue to be implemented for those lands under the proposed Update to the 2018 LRDP, along with other portions of the Open Space Preserve at the University's discretion.

2.4.4.3 CAMPUS CIRCULATION

The circulation element of the 2018 LRDP designates the general location and extent of existing bicycle and pedestrian circulation systems serving the campus, plus connections to the local and regional circulation networks. The campus transportation objectives referenced in the development of the circulation system are not changing with the proposed Update to the 2018 LRDP.

Circulation Updates

As provided for in the 2018 LRDP, improvements to the campus loop road (Theatre District) have been constructed, with the East Campus Loop Road under construction at the time the Draft SEIR was prepared. The campus roadway network is continuously monitored and improvements brought forward on an as-needed basis. Potential improvements that may be implemented under the Update to the 2018 LRDP to accommodate future growth include road calming measures, bike infrastructure improvements, and safety improvements.

Mobility Enhancement and Transportation Demand Management

Since adoption of the 2018 LRDP and certification of the EIR, the anticipated light rail transit system has been completed, with nearby stops of the Blue Line Trolley extension at the VA Medical Center, UC San Diego Central Campus, and UC San Diego Health La Jolla. As recommended in the Transportation Impact Study (TIS) conducted for the 2018 LRDP, recommendations for improving the network to enhance and expand mobility for campus users and enhance existing TDM measures to further reduce travel demand would be implemented with the proposed Update. UC San Diego has one of the most comprehensive TDM programs in the region, offering on-campus transit including electric carts, vans, small shuttle buses and full-sized transit buses fueled by renewable biogas; cycling programs; ridesharing; car sharing; and flexible work arrangements. These measures would continue to be refined through the life of the Update to the 2018 LRDP. Notable updates to the campus TDM measures that have occurred since the 2018 LRDP are summarized as follows (see also Section 3.10.1.2 of this SEIR):

Public Transit Incentive Programs

The U-Pass continues to allow students unlimited access to public transit services (MTS and North County Transit District [NCTD] bus and Trolley routes) as part of their registration fees for fall, winter, and spring quarters. There is also now a summer version of the U-Pass available for students at a discounted rate. The FaSt Pass program also continues to allow faculty and staff to enroll in pre-tax commuter benefits and receive fare discounts for access to regular MTS and NCTD buses. Beginning in August 2022, the VC-50 for Transit pilot program covers 50 percent of transit pass costs for UC San Diego faculty and staff (UC San Diego 2024c).

Cycling Programs

In place of Pedal Club incentives described in the 2018 LRDP EIR, campus populations may participate in the Triton Commuter Club, which recognizes and incentivizes actions that reduce driving via methods other than cycling, including walking or public transit use (UC San Diego 2024d). A shared electronic scooter program has also replaced the bikeshare program described in the 2018 LRDP EIR but provides similar benefits for campus populations to use shared means of alternative transportation (UC San Diego 2024e). There are currently over 7,000 bike parking locations on campus, and bike commuter program participants have access to free showers and lockers. The bicycle safety program also provides $10 bike helmet vouchers for purchases at the campus bike shop.

Ridesharing

The Lyft FLEX, Zimride, and iCommute programs described in the 2018 LRDP EIR are no longer in service. However, UC San Diego continues to provide registered carpool/vanpool groups with reserved carpool parking and allows permitless parking for Zipcars, which are offered at a discounted membership rate. The trip generation analysis prepared for this SEIR demonstrates the continued success of carpooling (19 percent of campus trips) for commuting to campus (LLG 2025b). In addition, the Emergency Ride Home pilot program offers ridesharing credit in the event of unexpected commute changes, similar to SANDAG's Guaranteed Ride Home program described in the 2018 LRDP EIR (UC San Diego 2024f).

Flexible Work Arrangements

UC San Diego offered flexible work arrangements prior to the COVID-19 pandemic, including alternative work hour, compressed work week, and telecommuting schedules. Since returning to campus following the lifting of COVID-19 pandemic restrictions, an increased number of staff and faculty are able to work remotely from alternative locations (e.g., from home) for all or portions of their work schedules, thereby decreasing commute trips to and from campus compared to those described and analyzed in 2018 EIR (UC San Diego 2024g). According to the mode split data collected by UC San Diego, approximately 18 percent of the campus population reported working remotely, thereby reducing associated worker commute trips to campus (LLG 2025b).

Parking

Similar to the 2018 LRDP, parking needs for future development under the Update to the 2018 LRDP would be taken into account when planning campus projects. The campus has over 16,600 parking spaces as of Spring 2024 (UC San Diego 2025). The majority of future parking would be constructed in multi-level structures and/or underneath buildings to optimize the usage of available campus land resources. UC San Diego does not set campus-wide parking requirements or minimum parking ratios for new development, but considers parking for each project in a manner consistent with UC San Diego's sustainability goals. The need for new parking structures are generally evaluated on a holistic, campus-wise basis and/or as driven by programmatic needs. The campus would continue to address community concerns regarding parking overflow into the local neighborhoods by providing an adequate supply of on-campus parking options along with incentives to use alternative transportation programs instead of automobiles.

2.4.4.4 UTILITY AND INFRASTRUCTURE SYSTEMS

The Update to the 2018 LRDP would build on UC San Diego's existing utility systems, which would need to be expanded to meet the expanded program needs and additional population growth anticipated with the Update. For example, the Update to the 2018 LRDP proposes land use changes that would accommodate a future electrical substation on campus, determined to become necessary as the campus increases its all-electric development and moves to decarbonize its electrical substations. Additionally, the proposed land use changes would accommodate a potential wastewater treatment plant or other facilities or infrastructure that may be needed on campus. Other critical infrastructure improvements would be made throughout campus to ensure adequate service to existing and future development, such as improvements, repairs, and connections to water, wastewater, telecommunications, electrical, natural gas, and other utility services present on campus. UC San Diego would continue to work in collaboration with public utility providers as necessary to plan and monitor campus utility demand and to implement expansion of distribution systems as needed to serve the anticipated growth. Refer to Section, 3.12, Utilities and Service Systems, for a description of the campus utility and infrastructure systems that provide domestic (potable) water, recycled water, wastewater, and various other utilities to the campus.

Water Infrastructure Improvements

The following is a list of water service system improvements recommended to address water flows associated with development under the Update to the 2018 LRDP. The full description of each recommended improvement required under future conditions associated with the implementation

of the proposed Update to the 2018 LRDP, and other recommended upgrades, are provided in the Domestic Water Study (Latitude 33 2024a).

West Campus

- The existing 8-inch diameter water main running in Scholars Drive North, south of Pangea Drive, should be upsized to a 10-inch diameter water main and continue the main south to Exploration Drive. The current 8-inch diameter loop south of Marshall Upper Apartments should be removed to allow for future development and a replacement loop would be required to maintain adequate velocities.
- A new 12-inch diameter water main from Voigt Drive to Pepper Canyon Drive would be required to support future development. The existing 12-inch main from Lyman Avenue should remain for redundancy.
- To support future development in the Health Sciences West area of campus, a 12-inch diameter water main through Villa La Jolla Drive connecting to an existing 12-inch diameter water main should be added to increase redundancy. Alternatively, upsizing the 8-inch diameter water mains throughout Health Sciences West to 12-inch diameter water mains would allow for a 12-inch diameter loop.

East Campus

- To support future development in East Campus, the upsizing of an 8-inch diameter water main in Miramar Street to a 12-inch diameter water main would maintain adequate velocities. An existing 10-inch diameter water main should be continued through any new development in the Mesa Housing area to support additional redundancy. The existing 8-inch diameter water main that services the east side of the Central Mesa Apartments should remain connected to the new 10-inch diameter water main.

In addition to the specific improvements listed above, water facilities, including water meters, pressure reducers, fire hydrants, and reclaimed water pipelines, may also be installed in the future to support development occurring under the Update to the 2018 LRDP.

Wastewater Infrastructure Improvements

Future flows from development associated with the proposed Update to the 2018 LRDP would require improvements and additions to expand the existing sewage service system. The following is a list of internal wastewater system improvement recommendations to address internal flows within the campus associated with development under the Update to the 2018 LRDP. The full description of each recommended improvement required under future conditions associated with the implementation of the proposed Update to the 2018 LRDP, and other recommended upgrades, are provided in the Sewer Study conducted for the Update to the 2018 LRDP (Latitude 33 2024b).

West Campus

- A new 10-inch diameter sewer line should be installed within Scholars Drive North roadway to two sewer stubs at the North Torrey Pines Living and Learning Neighborhood.
- The existing 8-inch diameter sewer lines connecting to the Central Utilities Plant should be upsized to 10-inch diameter sewer lines to support additional blowdowns from the facility.

- The existing 8-inch diameter sewer line south of the Pepper Canyon East area should be upsized to 12-inches and a 12-inch diameter sewer main constructed to serve new development in the area.
- Sewer mains at the existing Warren College student housing area should be upsized to accommodate future development.
- A new lateral should be added to accommodate proposed expansions of the Canyonview Recreation Center (project WC12), which may need a reconstruction of an existing 8-inch diameter sewer line.
- A sewer assessment should be completed to analyze the capacity of downstream sewer mains owned and operated by the City of San Diego south of the campus where West Campus wastewater flows into the City's 24-inch diameter public sewer trunk main (UCSD Trunk Sewer) within Gilman Drive. This assessment should consider potential capacity constraints and ability to serve buildout of the Update to the 2018 LRDP in conjunction with existing and anticipated development within the City of San Diego, as well as potential upgrades that may be required.

East Campus

- To determine routing of additional flows, a downstream sewer study on the City's system should be completed to assess future development of the Mesa Housing area on the City's existing 18-inch diameter sewer main.

Energy Infrastructure (Electricity and Natural Gas)

Implementation of the proposed Update to the 2018 LRDP would result in an increased demand on energy infrastructure due to the increased campus building space and population. As part of campus-wide goals, UC San Diego is undertaking the goal of decarbonization of the University's energy use. The proposed actions range from comprehensive plans for entire campus systems to individual building energy improvements. As described in Section 2.5.3, below, and Section 3.5, Energy, this decarbonization would lead to an increase in electricity use to offset the energy currently used through natural gas. Through this decarbonization effort, the use of natural gas and the need for natural gas infrastructure would be reduced over the course of the Update to the 2018 LRDP timeframe.

To address increased development of West Campus under the Update, an additional electrical substation (similar to the East Campus 69kV substation located along Genesee Avenue) is proposed to be sited within the existing Open Space Preserve area north of Hopkins Drive and south of Genesee Avenue. The construction of this substation along with other projects on campus would also likely require construction of underground utilities to route electricity infrastructure to areas where they are needed.

Telecommunications Infrastructure

UC San Diego is serviced by a telecommunications network which includes telephone and internet services. Implementation of the proposed Update to the 2018 LRDP would increase the amount of on-campus building space and campus population, which would result in the increased demand on telecommunications infrastructure. Most of these telecommunication services would continue to be administered or maintained by UC San Diego, using infrastructure throughout campus. Some

services, such as Spectrum and cable television services, are administered by private companies. Private cellular phone companies also service UC San Diego and surrounding areas. The infrastructure to support cell service is not directly maintained by UC San Diego but is instead constructed and operated by private companies. National cellular phone companies, such as T-Mobile, AT&T, and Verizon utilize individual cell towers to provide phone and internet access throughout the region. These towers are located in and around the UC San Diego campus, and additional towers may be erected in the future depending on demand changes and availability.

2.5 SUSTAINABLE DEVELOPMENT

As part of UC San Diego's commitment to responsible stewardship of its physical resources, campus development proposals under the proposed Update to the 2018 LRDP would continue to be evaluated for their environmental sustainability, in accordance with the UC Sustainable Practices Policy, UC San Diego Design Guidelines, and any future programs or plans that are developed by the UC or campus during the planning period for the Update to the 2018 LRDP.

2.5.1 SUSTAINABLE PRACTICES POLICY

The 2018 LRDP references the 2017 UC Sustainable Practice Policy, which established goals and policies in nine areas of sustainable practices directed at individual building projects and facilities operations throughout the UC system. The Sustainable Practices Policy has undergone several updates since 2017, reflecting evolving priorities and advancements in sustainability. With the most recent update in April 2024, the goals of the Sustainable Practices Policy have been expanded from 9 areas of sustainable practice to 13, including green building, clean energy, climate action, transportation, sustainable operations, zero waste, procurement, foodservice, water, health care, performance assessment, health and well-being, and diversity, equity, inclusion and justice.

The 2024 update introduces stronger climate action goals, prioritizing direct emission reductions and limiting the use of carbon offsets to align more closely with California's state goals. There is an increased focus on phasing out natural gas and transitioning to clean energy sources; all campuses and health centers must be fully decarbonized by 2045, with significant reductions by 2030, 2035, and 2040, within the development horizon of the Update to the 2018 LRDP. The updated policy also expands its focus areas to include equity and inclusion, sustainability performance, and health and wellbeing more explicitly. New development would continue to be required to utilize 100 percent clean electricity. Other important updates include increasing the minimum Leadership in Energy and Environmental Design (LEED) certification level from Silver to Gold; adopting a new requirement for new parking structures to achieve a Parksmart Silver certification; and requiring campuses to prepare or update a Climate Action Plan (CAP) incorporating a Climate Change Adaptation and Resiliency Plan. In accordance with the UC Sustainable Practices Policy, the campus would continue to incorporate design features, technological adaptations, and/or planning principles into future campus projects developed under the proposed Update to the 2018 LRDP to meet identified requirements. Compliance with the UC Sustainable Practices Policy is further discussed in Section 3.6.3.2.

2.5.2 DECARBONIZATION STUDY

UC San Diego completed a State-funded "Decarbonization Study" to identify decarbonization, sustainability, electrification, and energy savings actions that will allow the campus to achieve a 90 percent reduction in emissions from the combustion of fossil fuels on campus by 2045 (Salas

O'Brien 2024). The Decarbonization Study creates a high-level plan that acts as a road map to implement campus decarbonization, electrification and sustainability efforts. It evaluates potential energy alternatives to the existing natural gas cogeneration plant, the other major campus natural gas loads, and to the current fossil fuel transportation fleet, as well as an evaluation of required upgrades to the campus electrical infrastructure. The plan identifies specific actions that UC San Diego can take reduce Scope 1 carbon emissions by UC Sustainable Practices Policy target years of 2030, 2035, 2040, and 2045, using current or emerging technologies and leveraging strategies and projects that have already been identified and are underway. The key strategies to phase out fossil fuel use by 2045 include:

- Replace the natural gas boilers at the cogeneration system within the Central Utilities Plant with electrode boilers.
- Replace gas-fired heating systems with electric air and water source heat pumps.
- Reduce peak heating requirements to avoid costly electrical upgrades through energy efficiency measures, thermal energy storage and backup gas heating and steam systems.
- Maximize solar photovoltaic systems, solar thermal systems, and battery storage.
- Continue to monitor emerging, carbon-free technologies over time.

2.6 LRDP IMPLEMENTATION

The proposed Update to the 2018 LRDP is a plan to guide development; however, it is not an implementation plan. Adoption of the proposed Update does not constitute a commitment to any specific project or to meeting the LRDP's growth projections, including student enrollment. Development projects are brought forward individually to implement the LRDP and Update over time, and although the 2018 LRDP EIR and Update SEIR make informed estimations on the size and timing of potential future projects, these details may shift over time due to changes in resources and program priorities. Each development proposal must be approved by The Regents of the University of California, or the UC Office of the President (UCOP), and/or by the Chancellor, as appropriate. The review of campus development proposals is informed by a review process that involves input from staff, faculty and students, as well as the local community when appropriate, and evaluation relative to the 2018 LRDP and 2018 LRDP EIR.

Section 2.6 of the 2018 LRDP EIR describes the general process for implementing projects proposed in accordance with the 2018 LRDP. No substantive changes to the review and approval process are proposed with the Update. The design and construction of future projects at UC San Diego would continue to be subject to the campus development review process outlined in Section 2.6.1, Campus Development Review, of the 2018 LRDP EIR. This Update to the 2018 LRDP SEIR would provide a basis for tiering subsequent environmental documents that address subsequent activities pursuant to CEQA Guidelines Sections 15152, 15162, 15164, and 15168(c) (see 2018 LRDP EIR Section 2.6.2, Tiering Under CEQA). UC and Non-UC policies, laws, and regulations that apply to campus development are identified and discussed within the appropriate issue sections in Chapter 3.0 of this SEIR.

2.7 DISCRETIONARY ACTIONS AND APPROVALS

The Regents must take action in a public meeting on the following Regents Items when considering the Update to the 2018 LRDP:

- Certify the Update to the 2018 LRDP SEIR;
- Adopt the Mitigation Monitoring and Reporting Program identified in the Update to the 2018 LRDP SEIR;
- Adopt the CEQA Findings and Statement of Overriding Considerations; and
- Approve Amendment #1 to the 2018 LRDP for the Update to the 2018 LRDP.

Other agency approvals that may be needed for individual projects implemented under the Update to the 2018 LRDP are outlined in Chapter 1.0 of this SEIR.

2.8 REFERENCES

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2018b. Final LRDP EIR. November.

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3.0 Environmental Setting, Impacts, And Mitigation

2018 Long Range Development Plan EIR

As noted in Section 1.0, Introduction, The Regents certified an EIR (State Clearinghouse No. 2016111019) in November 2018 that analyzed and disclosed impacts from implementation of the 2018 LRDP for the UC San Diego La Jolla campus and adopted the 2018 LRDP as a guide for physical development to accommodate growth projected through 2035. As a result of an increasing demand for higher education and system-wide requirements to increase enrollment, UC San Diego is experiencing significantly higher rates of admitted students and associated campus population growth than was projected at the adoption of the 2018 LRDP and its accompanying EIR. As a result, UC San Diego has developed the proposed Update to the 2018 LRDP, which includes a revised land use development plan, updated growth projections, and a horizon year of 2040.

Subsequent Review Guidelines

Section 15162 of the CEQA Guidelines specifies the process for subsequent review of projects that have been analyzed in prior environmental documents.

As outlined in CEQA Guidelines Section 15162(a), when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was adopted, shows any of the following:

   A. The project will have one or more significant effects not discussed in the EIR;

   B. Significant effects previously examined will be substantially more severe than shown in the EIR;

   C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

D. Mitigation measures or alternatives which are considerably different from those in the EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15162(b) states that if changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under Section 15162(a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed.

Incorporation by Reference

As an SEIR, this document incorporates all applicable analysis contained in the 2018 LRDP EIR by reference and updates the previous analysis to focus on new or substantially more severe significant impacts in accordance with CEQA's subsequent review standards as legally required in light of the proposed changes to the 2018 LRDP, including the revised land use plan, and/or due to new information of substantial importance that has become available since certification of the previous EIR.

The 2018 LRDP EIR retains informational value in the future discretionary decisions of the University and responsible agencies as part of consideration of the Update to the 2018 LRDP and this document is herein incorporated by reference. The 2018 LRDP EIR is available at: https://plandesignbuild.ucsd.edu/planning/lrdp/la-jolla.html#2018-LRDP-Environmental-Impact-.

Definition of Baseline

In a standard EIR, CEQA requires clear identification of the baseline against which environmental impacts of the proposed project must be evaluated. The CEQA baseline is defined by conditions that exist at a point in time. Section 15125 of the CEQA Guidelines requires EIRs to include a description of the physical environmental conditions in the project area that exist at the time that the NOP is circulated.

However, under subsequent review standards, the term "baseline" has a specific meaning. In CEQA subsequent review standards, the lead agency is not required to consider a new existing conditions baseline (i.e., existing conditions at the time that the SEIR NOP is circulated). Rather, the previously approved project as analyzed in the prior environmental analysis is considered to be the "baseline" condition for the SEIR.[1] The baseline for subsequent review purposes is adjusted to be the buildout growth and development originally approved under the 2018 LRDP. Since buildout under the 2018 LRDP EIR has already undergone full environmental review under CEQA in a certified EIR, the SEIR is not required to reanalyze those impacts but should focus on substantial changes to 2018 LRDP proposed by the Update or new information or substantial changes in circumstances that may result in new or substantially more severe significant impacts than disclosed in the 2018 LRDP EIR.

[1] Remy et al., Guide to the California Environmental Quality Act, 11th ed. 2007, at p. 206.

This SEIR analyzes the impacts of the proposed updates to the 2018 LRDP and compares them to the impacts associated with full buildout of the 2018 LRDP, as disclosed in 2018 LRDP EIR. For instance, the impact analysis focuses on the proposed increase in building area at buildout compared to the amount forecasted in the 2018 LRDP, rather than the difference between existing (2024) developed area and the 2040 buildout year. Impacts are assessed to provide a direct comparison between buildout conditions of the 2018 LRDP and the proposed Update.

Scope of the Subsequent Programmatic Environmental Review

Section 15163(b) of the CEQA Guidelines states that a supplement to an EIR needs only to contain the information necessary to make the prior EIR adequate for the project as revised. However, there is existing case law that provides guidance regarding the scope and contents of a subsequent environmental review document. Generally, under this case law, a subsequent or supplemental EIR is required to evaluate only the changes in the project, changes in circumstances, or new information that led to the preparation of the further EIR. As the supreme court stated in *Friends of the College of San Mateo Gardens v. San Mateo County Community College District* (2016) 1 CA5th 937, 949, the purpose of CEQA's subsequent review provisions is "to explore environmental impacts not considered in the original environmental document. The event of a change in a project is not an occasion to revisit environmental concerns laid to rest in the original analysis" (citing *Save Our Neighborhood v. Lishman* [2006] 140 CA4th 1288, 1296, and *Mani Bros. Real Estate Group v. City of Los Angeles* [2007] 153 CA4th 1385, 1398).[2]

Accordingly, Sections 3.1 through 3.13 of this SEIR contain a discussion of the potential environmental effects from implementation of the proposed Update to the 2018 LRDP as analyzed through the purview of subsequent review. The analysis focuses on topics where substantial changes associated with the Update to the 2018 LRDP may result in new significant impacts or a substantial increase in the severity of previously identified significant environmental effects disclosed in the 2018 LRDP EIR.

The subsequent environmental review for the Update to the 2018 LRDP provides an in-depth analysis for the following topics:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Noise
- Population and Housing
- Public Services
- Transportation and Circulation
- Tribal Cultural Resources

[2] CEB, 2024. 19 Subsequent CEQA Review - Practice Under the California Environmental Quality Act – CEB. https://research.ceb.com/secondary-sources/area/environmental-land-use-and-natural-resources/15pueq0000/bv19.54

- Utilities and Service Systems
- Wildfire

The following environmental topic areas were determined through the subsequent review process completed for this SEIR to have been adequately analyzed in the 2018 LRDP EIR and are addressed in Section 4.1, Effects Adequately Analyzed in the 2018 LRDP EIR, of this SEIR:

- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Recreation

Finally, two environmental topical areas—Agriculture and Forestry Resources and Mineral Resources—from Appendix G of the CEQA Guidelines were not expected to incur significant adverse impacts resulting from implementation of the 2018 LRDP because they were not applicable. These two environmental topical areas are also included in Section 4.1 of this SEIR.

Format of the Environmental Analysis

Each resource topic considered in this chapter of the SEIR includes a brief introduction that describes the topic to be analyzed and the sources used to evaluate the potential impacts of the Update to the 2018 LRDP, as applicable. Each section includes the following subsections: Environmental Setting; Regulatory Framework; Project Impacts and Mitigation, which includes a Summary of the Analysis in the 2018 LRDP EIR, Proposed Changes that Require Major Revisions to the 2018 LRDP EIR, Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance, Standards of Significance, Analysis of the Update to the 2018 LRDP; Cumulative Impacts and Mitigation; CEQA Issues Where There is No Potential for a Significant Effect; and References. An overview of the information included in these subsections is provided below.

Environmental Setting

This subsection describes substantial changes in circumstances under which the project will be undertaken, such as changes to the existing conditions within the campus or surrounding areas, that may lead to new or substantially more severe significant impacts not analyzed in the 2018 LRDP EIR.

Regulatory Framework

This subsection provides a summary of regulations, plans, policies, and laws that are relevant to each issue area at the federal, state, UC, and local levels, as applicable. The focus of discussion is on those that have been added or updated since the certification of the 2018 LRDP EIR. Where regional or local regulations may be relevant but non-binding/non-regulatory, it is specifically noted.

Project Impacts and Mitigation

This subsection describes the potential environmental impacts of the Update to the 2018 LRDP. Each issue is addressed in its own subsection and is separately numbered (e.g., Issue 1, Issue 2, etc.).

Summary Box

Each issue topic includes a summary box that provides the following information:

- 2018 LRDP EIR Significance Conclusion – presents the significance conclusion identified for the 2018 LRDP EIR.
- Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?
- Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?
- Update to the 2018 LRDP SEIR Significance Conclusion – presents the significance conclusion identified for the Update to the 2018 LRDP SEIR.
- Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts from Update – indicates whether the mitigation measures in the 2018 LRDP EIR resolve the impacts associated with the proposed Update and/or whether new or revised mitigation measures are required.

Each environmental topic that is analyzed is divided into issues, based on potential impacts. The prior conclusion on potential impacts from the 2018 LRDP EIR is summarized, and the effects are compared to buildout of the Update to buildout of the 2018 LRDP. Based on the subsequent analysis, impacts of the Update are considered significant, potentially significant, or less than significant and compared to impact conclusion in 2018 LRDP EIR. Each conclusion notes whether the impact has changed from the prior EIR.

Summary of Analysis in the 2018 LRDP EIR

Summarizes the analysis and significance conclusion identified in the 2018 LRDP EIR.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Indicates whether the proposed project includes changes that require major revisions to the analysis or conclusions in the 2018 LRDP EIR.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Indicates whether there are new circumstances (such as changes to the existing conditions within the campus or surrounding areas) or new information of substantial importance (such as changes to the regulatory framework) that require major revisions to the analysis or conclusions in the 2018 LRDP EIR.

Standards of Significance

Standards of significance are criteria used to determine whether potential environmental effects are significant. The standards of significance used in this analysis are primarily based upon the 2024 version of Appendix G of the CEQA Guidelines that has been amended since the 2018 LRDP EIR. The amended standards are identified and applied in impact chapters. However, in some cases, standards were developed based on standards adapted from other agencies or entities. This subsection defines the type, amount, and/or extent of impact that would be considered a significant adverse change in the environment compared to the 2018 LRDP EIR.

Some standards of significance, such as air quality, traffic and noise, are quantitative, while others such as aesthetics are qualitative. The standards of significance are intended to assist the reader in understanding how and why the SEIR reaches a conclusion that an impact is significant or less than significant.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology. This subsection summarizes the methodology used to evaluate effects. Impacts are evaluated quantitively where applicable and qualitatively where quantification is not feasible and/or warranted. Where the assumptions and/or methodology differ from the 2018 LRDP EIR, this will be highlighted in this subsection.

Impact Analysis. The analysis of environmental impacts considers both the construction and operational phases associated with implementation of the Update to the 2018 LRDP. As required by CEQA Guidelines Section 15126.2(a), direct, indirect, short-term, on-campus, and/or off-campus impacts are addressed, as appropriate, for the environmental issue area being analyzed.

All impacts are considered potential because the Update to the 2018 LRDP is not a development project itself, but rather a framework for campus development. Impacts will be evaluated when actual development takes place. Since the Update to the 2018 LRDP does not commit to any specific development, potential development projects under the Update to the 2018 LRDP are only possibilities until they are specifically proposed by UC San Diego.

The SEIR utilizes the following terms to describe the level of significance of impacts identified in the environmental analysis:

- **Potentially Significant:** Impacts resulting from implementation of the Update to the 2018 LRDP that may exceed defined standards of significance before mitigation is considered are referred to as potentially significant.

- **Less Than Significant with 2018 LRDP EIR Mitigation Incorporated:** This term applies where the inclusion of mitigation measures from the 2018 LRDP EIR have reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact."

- **Less Than Significant with New Mitigation Incorporated:** This term applies where the inclusion of new or updated mitigation measures have reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact."

- **Less than Significant:** "Less than significant" is used to refer to impacts resulting from implementation of the Update to the 2018 LRDP that are not likely to exceed the defined standards of significance.

- **Significant and Unavoidable:** Significant impacts resulting from implementation of the Update to the 2018 LRDP that cannot be eliminated or reduced to a less than significant level through implementation of feasible mitigation measures are referred to as significant and unavoidable.

A "significant effect" is defined by Section 15382 of the CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment … [but] may be considered in determining whether the physical change is significant."

Level of Significance before Mitigation. Summarizes the level of significance before mitigation is applied.

Mitigation Measures. Section 15126.4 of the CEQA Guidelines requires an EIR to "describe feasible measures which could minimize significant adverse impacts." The CEQA guidelines define feasibility as capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations. The "Mitigation Measures" subsection discusses mitigation measures that could reduce the severity of impacts identified in the "Impact Analysis" subsection.

A summary of measures identified in the 2018 LRDP EIR will be provided, followed by a discussion of their applicability to the Update. Refinements to or removal of any prior measures will be noted, where applicable. Each section will include the following:

- Applicable measures from the 2018 LRDP EIR (this section will also discuss whether mitigation measures from the 2018 LRDP EIR are no longer applicable)

- New and/or revised mitigation measures for the Update identified in the SEIR

***Level of Significance After Mitigation*.** This subsection determines the level of significance of each impact upon implementation of mitigation measures.

Cumulative Impacts and Mitigation

CEQA requires that EIRs discuss cumulative impacts, in addition to project impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Further, the discussion is guided by the standards of practicality and reasonableness. According to Section 15355 of the CEQA Guidelines, "cumulative impacts" are defined as:

> "… two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changed resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time."

Section 15130(a) of the CEQA Guidelines further states that a "cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." The cumulative analysis contained in this SEIR assumes that all mitigation measures identified in Sections 3.1 through 3.13 to mitigate project impacts are adopted, unless otherwise specified.

Section 15130(a) of the CEQA Guidelines requires that EIRs discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Therefore, the discussion of cumulative impacts in an EIR evaluates whether the impacts of the project will be significant when considered in combination with past, present and future reasonably foreseeable projects, and whether the project would make a cumulatively considerable contribution to those impacts. CEQA recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project-related impacts, but instead should "be guided by the standards of practicality and reasonableness." CEQA Guidelines indicate that where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but shall briefly describe the basis for its conclusion. As further clarified by Section 15065 of the CEQA Guidelines, "cumulatively considerable" 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. The CEQA Guidelines allow for a project's contribution to be rendered less than cumulatively considerable with implementation of mitigation.

Each impact section in the SEIR provides a summary box of the cumulative impact conclusion for that topic. The summary box includes:

- *Cumulative Impact*. The cumulative impact topic within the issue area.
- *2018 Significance Determination*. The level of significance of the 2018 cumulative impact.
- *2018 LRDP Contribution*. Indicates whether the impact in the 2018 LRDP EIR was determined to have a cumulatively considerable contribution to the baseline cumulative impact.
- *Updated Significance Determination*. The level of significance of the subsequent cumulative impact of the Update.
- *Update to the 2018 LRDP Contribution*. Indicates whether the Update would have a cumulatively considerable contribution to the subsequent cumulative impact.

The geographic scope of the cumulative impact analysis varies depending upon the specific environmental issue area being analyzed. The geographic scope defines the geographic area within

which projects may contribute to a specific cumulative impact. Therefore, past, present, and future reasonably foreseeable projects within the defined geographic area for a given cumulative issue must be considered.

CEQA Guidelines Section 15130(b) presents two possible approaches for considering past, present, and future reasonably foreseeable projects. It indicates that either of the following could be used:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

- A summary of projections contained in an adopted general 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.

This SEIR uses both of these methods. Past and present projects are considered as part of the baseline when evaluating project impacts. Any exceptions are noted in the following sections. As noted in other chapters of this SEIR, the campus currently is still constructing campus facilities and implementing development proposals in accordance with the approved 2018 LRDP. Collectively, those campus projects are in various stages of development, including in the planning phase, design stage, or construction phase, and are listed in Table 3-1, *Campus Cumulative Projects*, and shown on Figure 3-1, *Cumulative Projects Map*.

With regard to future reasonably foreseeable projects off campus, consideration of projects that could be implemented to fully execute adopted community plans, such as the City of San Diego General Plan (including the proposed Blueprint SD update to the 2008 General Plan, as applicable), La Jolla Community Plan and Local Coastal Program Land Use Plan, and University Community Plan (including the proposed University Community Plan Update, as applicable), is typically sufficient to account for cumulative impacts from future reasonably foreseeable projects; therefore, this is the primary approach taken in the analysis.

CEQA Issues Where There is No Potential for a Significant Effect

There are certain issues within the environmental topical areas from the 2018 LRDP EIR that were determined to have less than significant impacts and are not expected to incur new significant impacts or a substantial increase in the severity of previously identified impacts as a result of the Update to the 2018 LRDP. Consistency with the conclusions of the 2018 LRDP EIR regarding these CEQA issues are highlighted, as applicable.

References

This section identifies sources relied upon for each environmental topic area analyzed in this document.

Table 3-1
Campus Cumulative Projects (as of Spring 2024)

Map ID	Project Name	Site ID	Project Type	Approximate Project Size	Project Status
Future On-campus Projects Proposed Under the Update to the 2018 LRDP[1]					
12	Canyonview Recreation Expansion	WC12	Sports and Recreation	50,000 GSF	In Project Planning
18	La Jolla Medical Campus Parking Structure	EC8	Parking Structure	1,500 spaces	In Project Planning
14	La Jolla Medical Center Bed Tower 2	EC1	Academic Healthcare (Hospital)	Up to 400 inpatient beds	In Project Planning
13	Pepper Canyon East Mixed-Use Housing District	WC13 & WC14	Housing, Sports and Recreation, Community-Oriented	6,000 beds; 250,000 GSF hotel/conference center	In Project Planning
17	Preuss School Expansion	EC7	Community Oriented	30,000 GSF	In Project Planning
21	South and Central Mesa Student Housing Redevelopment	EC9 & EC10	Housing	Up to 6,000 beds in phases	In Project Planning
7	Triton Recreation Center	WC8	Sports and Recreation	170,000 GSF	In Project Planning
11	Wastewater Treatment Plant	WC19	General Services	To be determined	Contingent on Future Need
4	West Campus Electrical Substation	WC3	General Services	To be determined	In Project Planning
Future On-campus Projects Proposed Under the approved 2018 LRDP[1]					

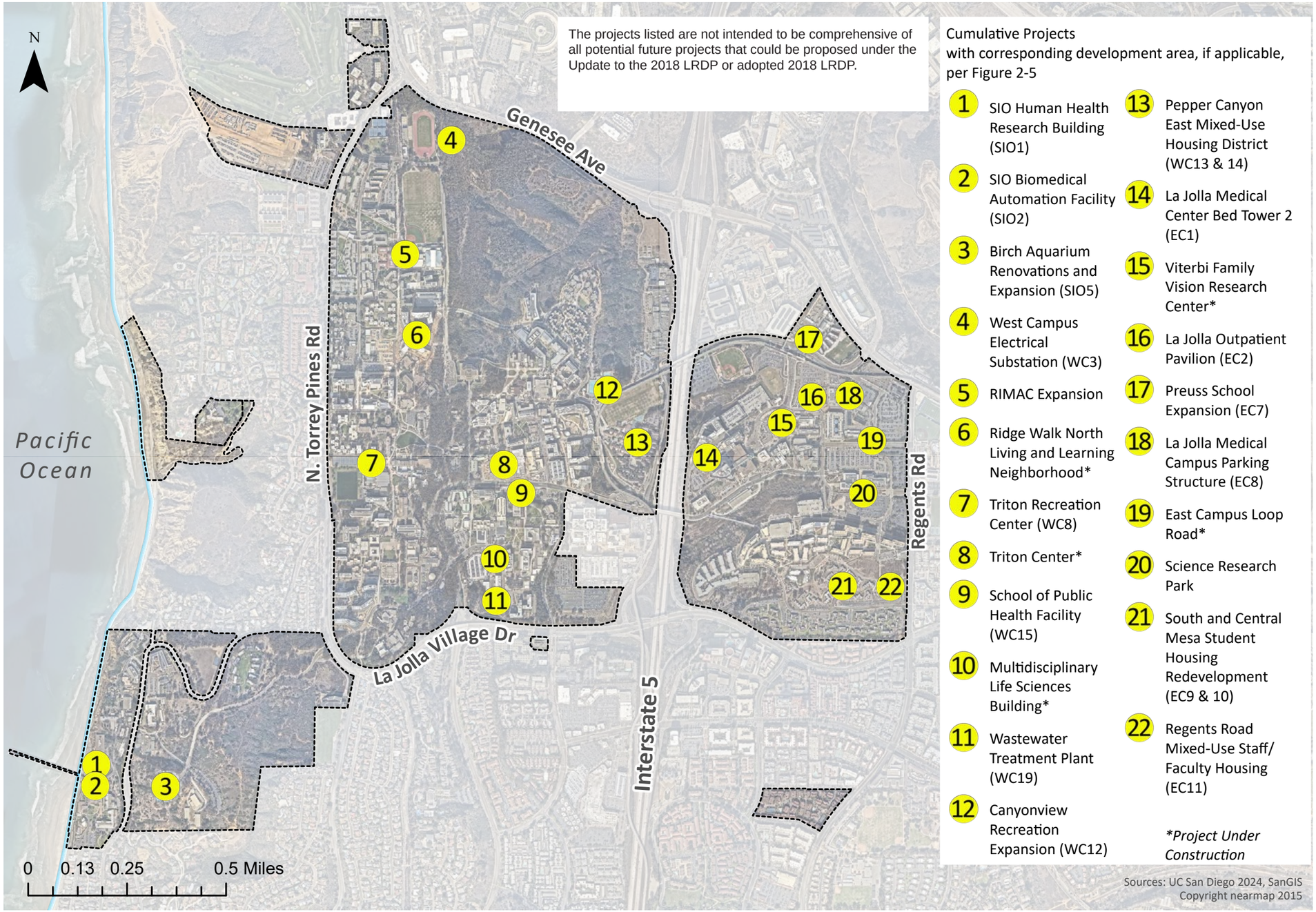
Map ID	Project Name	Site ID	Project Type	Approximate Project Size	Project Status
16	La Jolla Outpatient Pavilion	EC2	Academic Healthcare (Outpatient Clinic)	180,000 GSF	In Project Planning
22	Regents Road Mixed-Use Staff/Faculty Housing	EC11	Mixed-Use Housing	1,600 units and 75,000 GSF Retail	In Project Planning
5	RIMAC Expansion	N/A	Sports and Recreation	15,000 GSF	In Project Planning and Environmental Review
9	School of Public Health Facility	WC15	Academic Research	100,000 GSF	In Project Planning
2	SIO Biomedical Automation Facility	SIO2	Academic Research	7,000 GSF	In Project Planning
1	SIO Human Health Research Building	SIO1	Academic Research	100,000 GSF	In Project Planning
On-campus Projects Approved or Implemented Under the 2018 LRDP					
N/A	8980 Villa La Jolla Drive	N/A	Academic Healthcare and Parking	110,000 GSF; 275 parking spaces	Completed

Map ID	Project Name	Site ID	Project Type	Approximate Project Size	Project Status
3	Birch Aquarium Renovations and Expansion	SIO5	Aquarium, Community Oriented	15,000 GSF (Renovation and expansion)	First phase project under construction (interior renovation) with later phases in planning
N/A	Central Utilities Plant Expansion	N/A	Utility Expansion	14,000 GSF	Completed
N/A	Design and Innovation Building	N/A	Academic Building	74,000 GSF	Completed
19	East Campus Loop Road	N/A	Road Realignment	N/A	Under Construction
N/A	Franklin Antonio Hall	N/A	Academic and Research Facility	200,000 GSF	Completed
10	Multidisciplinary Life Sciences Building	N/A	Academic and Academic Research Facility	202,000 GSF	Under Construction
N/A	Pepper Canyon Amphitheater ("Epstein Family Amphitheater"), Public Realm Improvements, and Warren Field House	N/A	Amphitheater and Support	3,000-person amphitheater, 12,900 GSF facility (plus exterior site improvements); 2,700 GSF field house and training center	Completed
N/A	Pepper Canyon West Living and Learning Neighborhood	N/A	Housing	580,500 GSF; 1,310 beds	Completed
N/A	Ridge Walk Improvements (Revelle to Muir)	N/A	Pedestrian Improvement	N/A	Completed
6	Ridge Walk North Living and Learning Neighborhood	N/A	Academic and Housing	933,520 GSF; 2,400 beds	Under Construction
20	Science Research Park	N/A	Academic and Parking Structures	1,100,000 SF 3,120 parking spaces	Approved
N/A	Theater District Living and Learning Neighborhood	N/A	Academic and Housing	2,040 beds; 911,500 GSF	Completed

Map ID	Project Name	Site ID	Project Type	Approximate Project Size	Project Status
N/A	Torrey Pines Fire Station Number 52[2]	N/A	Public Facility (City of San Diego Fire Station)	10,500 GSF	Completed
8	Triton Center	N/A	Academic Facility	332,000 SF 175 parking spaces	Under Construction
15	Viterbi Family Vision Research Center	N/A	Science Research Building	100,000 GSF	Under Construction
N/A	York Hall Seismic Improvements	N/A	Academic and Research	134,000 GSF (Seismic Improvement)	Completed
On-campus Projects Previously Identified in 2018 LRDP EIR Table 3-1 (Approved under 2004 LRDP)					
N/A	Center for Novel Therapeutics	N/A	Science Research Building	120,000 GSF	Completed
N/A	Center for Novel Therapeutics	N/A	Academic Building (Renovation)	120,000 GSF (Renovation)	Completed
N/A	Gilman Bridge/Drive Realignment [3]	N/A	Bridge/Road Realignment	N/A	Completed
N/A	Mesa Housing Pedestrian and Bicycle Bridge	N/A	Bridge	N/A	Completed
N/A	Mesa Nueva Housing	N/A	Housing	625,000 SF; 1,355 beds	Completed
N/A	Mesa Nueva Parking Structure	N/A	Parking Structure	900 spaces	Completed
N/A	Mesa/Healthcare Shared Use Parking Structure	N/A	Parking Structure	1,200 spaces	Completed
N/A	Mid-Coast Trolley Line and Pepper Canyon and East Campus Stations [2]	N/A	Public Transit (Blue Line Trolley)	N/A	Completed
N/A	North Torrey Pines Living and Learning Neighborhood (NTPLLN)	N/A	Academic Facilities and Housing	1,050,000 GSF; 2,000 beds	Completed
N/A	Nuevo East Housing	N/A	Housing	712,000 GSF; 1,380 beds	Completed

Map ID	Project Name	Site ID	Project Type	Approximate Project Size	Project Status
N/A	Nuevo West Housing	N/A	Housing	435,000 GSF; 800 beds	Completed
N/A	Scholars Drive Parking Structure (at NTPLLN)	N/A	Parking Structure	1,200 spaces	Completed
N/A	South Parking Structure	N/A	Parking Structure	1,350 spaces	Completed
N/A	Tata Hall for Sciences	N/A	Academic Building	130,000 GSF	Completed
N/A	Ted and Jean Scripps Marine Conservation and Technology Facility	N/A	Academic Facility (Renovation)	31,000 GSF (Renovation)	Completed

Source: UC San Diego 2024.
Notes:
GSF = gross square feet, N/A = not applicable, SF = square feet
[1] Projects listed as "In Project Planning" have been identified in the UC Capital Financial Plan and/or are considered to be in a project-level concept, planning, and/or design phase as of Fall 2024. This list is not comprehensive of all potential future projects that could be proposed under the Update to the 2018 LRDP or adopted 2018 LRDP. Refer to Table 2-4 for the complete development growth projections and to Table 2-5 and Figures 2-3 through 2-5 for anticipated development sites and land uses associated with the Update to the 2018 LRDP.
[3] City of San Diego is the CEQA lead agency for the Torrey Pines Fire Station Number 52 project. Campus land was donated to the City of San Diego for the project.
[2] SANDAG is the CEQA lead agency for the Gilman Bridge/Drive Realignment and Mid-Coast Trolley Line and Pepper Canyon and East Campus Stations projects.



The projects listed are not intended to be comprehensive of all potential future projects that could be proposed under the Update to the 2018 LRDP or adopted 2018 LRDP.

Cumulative Projects
with corresponding development area, if applicable, per Figure 2-5

1. SIO Human Health Research Building (SIO1)
2. SIO Biomedical Automation Facility (SIO2)
3. Birch Aquarium Renovations and Expansion (SIO5)
4. West Campus Electrical Substation (WC3)
5. RIMAC Expansion
6. Ridge Walk North Living and Learning Neighborhood*
7. Triton Recreation Center (WC8)
8. Triton Center*
9. School of Public Health Facility (WC15)
10. Multidisciplinary Life Sciences Building*
11. Wastewater Treatment Plant (WC19)
12. Canyonview Recreation Expansion (WC12)
13. Pepper Canyon East Mixed-Use Housing District (WC13 & 14)
14. La Jolla Medical Center Bed Tower 2 (EC1)
15. Viterbi Family Vision Research Center*
16. La Jolla Outpatient Pavilion (EC2)
17. Preuss School Expansion (EC7)
18. La Jolla Medical Campus Parking Structure (EC8)
19. East Campus Loop Road*
20. Science Research Park
21. South and Central Mesa Student Housing Redevelopment (EC9 & 10)
22. Regents Road Mixed-Use Staff/ Faculty Housing (EC11)

**Project Under Construction*

Sources: UC San Diego 2024, SanGIS
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HELIX Environmental Planning

Cumulative Projects

Figure 3-1

3.1 AESTHETICS

This section evaluates the existing visual character and quality of the UC San Diego campus and surrounding area, including visual resources, scenic vistas, and issues associated with light and glare. It evaluates whether the proposed Update to the 2018 LRDP SEIR would result in new or substantially more severe significant environmental impacts compared to those identified in Section 3.1 of the previous EIR. The analysis in this SEIR assesses potential effects on scenic vistas, damage to visual resources within a state scenic highway, conflicts with applicable regulations governing scenic quality in urban areas, and potential increases in light pollution and glare.

3.1.1 ENVIRONMENTAL SETTING

This SEIR is intended to provide a comparison of the Update to the 2018 LRDP to the baseline level, which is considered buildout of the 2018 LRDP. The descriptions of the existing visual character presented below are provided for context and informational purposes. The visual character of UC San Diego and the surrounding areas is detailed in Section 3.1.1, Environmental Setting, of the 2018 LRDP EIR. This section covers landform and major topographic features, natural and ornamental vegetation and landscaping, land use and development, and visual characteristics such as visibility and publicly available views from various on- and off-campus locations. It also considers the perspectives of frequent campus viewers.

3.1.1.1 CAMPUS VISUAL CHARACTER

The visual character of the UC San Diego campus is assessed in terms of changes in landform, vegetation, development, and campus viewers compared to the conditions disclosed in the 2018 LRDP EIR.

Vegetation

Existing vegetation within the campus has not substantially changed since preparation of the 2018 LRDP EIR. The 2018 LRDP EIR identified 335.3 acres of Open Space Preserve areas within the campus. The Update to the 2018 LRDP would include modifications to land uses, including Open Space Preserve. On the West Campus, two areas within existing Open Space Preserve lands would be redesignated as General Services. To accommodate this loss, a small area adjacent to the Geisel Library on the West Campus would be redesignated as Open Space Preserve. On the East Campus, small areas of Academic and Housing land uses would be redesignated as Open Space Preserve. At SIO, three areas of existing Academic land uses would be redesignated as Open Space Preserve. Overall, the Update to the 2018 LRDP would increase the acreage of the Open Space Preserve to approximately 338 acres (see Figures 2-3 and 2-4).

Development

As noted in the 2018 LRDP EIR, roughly 71 percent of the campus is developed. The remaining 29 percent consists of campus Open Space Preserve, the formal open space network of habitat areas, restorative open spaces, eucalyptus groves and urban forest, and other undeveloped land. While development has occurred within the campus since certification of the 2018 LRDP EIR, the majority of the construction has involved redevelopment of existing developed areas and the overall proportions between developed areas and open spaces on the campus remain consistent. A

description of the recent development within West Campus, East Campus, and SIO is provided below.

West Campus

Since 2018, consistent with the 2018 LRDP, there has been a substantial amount of redevelopment within the La Jolla campus. West Campus continues to house a majority of the undergraduate student housing. In addition, West Campus hosts a range of academic buildings including two new colleges, increasing the number from six to eight.

The architectural style on West Campus continues to be eclectic, characterized by a modern style using horizontal and vertical planes of wood, concrete, and glass. Spatially, the campus is organized into "neighborhoods," which are compact clusters of buildings separated by open spaces. These neighborhoods help divide the campus into smaller, distinct communities. Each neighborhood has its own distinct entries, boundaries, and urban design elements. For a detailed description of the campus neighborhoods, refer to Section 3.9, Land Use and Planning, of the 2018 LRDP EIR. Projects either completed or nearing completion as of Spring 2024 since approval of the 2018 LRDP include the Theatre District Living and Learning Neighborhood (home of Eighth College), Pepper Canyon West Student Housing, Epstein Family Amphitheater, Franklin Antonio Hall, the Central Utilities Plant Expansion, and the Design and Innovation Building. Other notable changes in the West Campus include the completion of the Mid Coast Trolley (UC San Diego Blue Line extension) with two on-campus stations, including substantial pedestrian experience improvements around the UC San Diego Central Campus Trolley Station (Pepper Canyon).

Major projects under construction as of Spring 2024 include the Triton Center project in University Center Neighborhood; Multidisciplinary Life Sciences Building in the Health Sciences district; and Ridge Walk North Living and Learning Neighborhood, the future new home of Marshall College. The infill development along campus borders and in the central areas of the campus has increased the visual density of structures on the UC San Diego areas viewed from surrounding areas. West Campus also contains a variety of recreational fields and facilities, as well as a large open space in the northern portion.

East Campus

The majority of UC San Diego's graduate and professional student housing, as well as medical facilities, are located on the East Campus. Since preparation of the 2018 LRDP EIR, the Nuevo West and East, and Mesa Nueva housing projects have been constructed, redeveloping two-story buildings with high rise bed towers, changing the character of the neighborhood to a denser development style. The Viterbi Family Vision Research Center, an infill project in the East Campus Health Sciences Neighborhood, is anticipated to be completed in Summer of 2025. This new facility would provide additional research spaces for ophthalmologic disease, located just west of the existing Shiley Eye Institute.

Scripps Institution of Oceanography

Similar to the development conditions discussed in the 2018 LRDP EIR, roughly half of SIO remains undeveloped, with the remainder made up of academic buildings and housing. The latest addition to SIO is the Marine Conservation and Technology Facility, which opened in 2023. Otherwise, no significant changes to SIO development have occurred since approval of the 2018 LRDP.

3.1.1.2 VISUAL CHARACTER OF AREAS SURROUNDING THE CAMPUS

The UC San Diego campus is surrounded by a variety of land uses and landforms in the University and La Jolla communities. The visual character of the areas surrounding the campus is described below in terms of changes to the landform, vegetation, and development compared to the conditions disclosed in the 2018 LRDP EIR.

North of West Campus

The visual character of the area north of West Campus is described within Section 3.1.1.2 of the 2018 LRDP EIR. Station 52/Torrey Pines Fire Station was recently completed, adding a new land use to the area, which is characterized by scientific research spaces, industrial parks, commercial uses, and open space. The Scripps Research Institute is currently constructing the Chi-Huey Wong Laboratories for Biomedical Research, a state-of-the-art two-story, 83,000-GSF facility, located on the northern intersection of Genesee Avenue and North Torrey Pines Road.

South of West Campus

The visual character of the area south of West Campus is described in Section 3.1.1.2 of the 2018 LRDP EIR. The 8980 Villa La Jolla project was completed in 2024, converting a two-story restaurant at the corner of La Jolla Village Drive and Villa La Jolla Drive to a multi-story facility that will provide space for UC San Diego Health Sciences as well as Extended Studies. This area was incorporated into the campus boundary. The two-story Beverly and Joseph Glickman Hillel Center (9009 La Jolla Scenic Drive North) was also completed recently, located south of UC San Diego's Theatre District.

Near East Campus

The visual character of the area near East Campus, between Voigt Drive and Genesee Avenue, includes a complex of medical offices and facilities, including the Scripps Memorial Hospital La Jolla, which has redeveloped surface parking along Genesee Avenue with high-rise inpatient bed towers/offices and constructed a multi-story parking structure along Voigt Drive near the boundary with East Campus since preparation of the 2018 LRDP EIR.

I-5 Corridor

Within the I-5 corridor, the extension of the above grade San Diego Metropolitan Transit System Blue Line Trolley track was completed since preparation of the 2018 LRDP EIR and has stops on Voigt Drive (East Campus) and Pepper Canyon (West Campus). A Trolley stop was constructed at the VA Medical Center and the VAMC also is nearing completion of a new Spinal Cord Injury Center Facility and Parking Structure expansion project.

West of West Campus

The visual character west of West Campus (including the La Jolla Farms neighborhood) has remained largely unchanged since preparation of the 2018 LRDP EIR and continues to involve primarily low- and medium-density residential and hotel uses. For more detailed information about this area, see Section 3.1.1.2 of the 2018 LRDP EIR.

Near Scripps Institution of Oceanography

The visual character of the areas surrounding SIO has remained largely unchanged since preparation of the 2018 LRDP EIR and continues to consist primarily of single-family residential areas to the north and south of SIO, and academic, research, and residential buildings and undeveloped areas within SIO. For more detailed information about this area, see Section 3.1.1.2 of the 2018 LRDP EIR.

3.1.1.3 CAMPUS VISUAL RESOURCES

As described in the 2018 LRDP EIR, campus visual resources include connections with the ocean, foothills, nearby canyons and the mountains to the east. These elements are crucial for landmark identification and preserving the campus' image. Section 3.1.1.3 of the 2018 LRDP EIR identified visually sensitive areas and key vantage points (KVPs), which are considered scenic vistas. Figure 3.1-2 of the 2018 LRDP EIR depicts the KVPs, PDZ, and visual sensitive zone. For ease of reference, this figure has been reproduced in the SEIR as Figure 3.1-1, *Campus Visual Resources*.

Visual Sensitive Zone (Scripps Institution of Oceanography)

SIO continues to be designated as a visual sensitive zone for the campus, offering excellent views of the Pacific Ocean, La Jolla shoreline, and the natural landform of SIO. In addition, a portion of SIO is located within a height restricted zone per Memorandum of Understanding (MOA)/Coastal Development Permit (CDP) 6-10-041, as shown on Figure 3.1-1. The Update to the 2018 LRDP does not propose changes to the growth or development of SIO compared to what was outlined in the 2018 LRDP EIR.

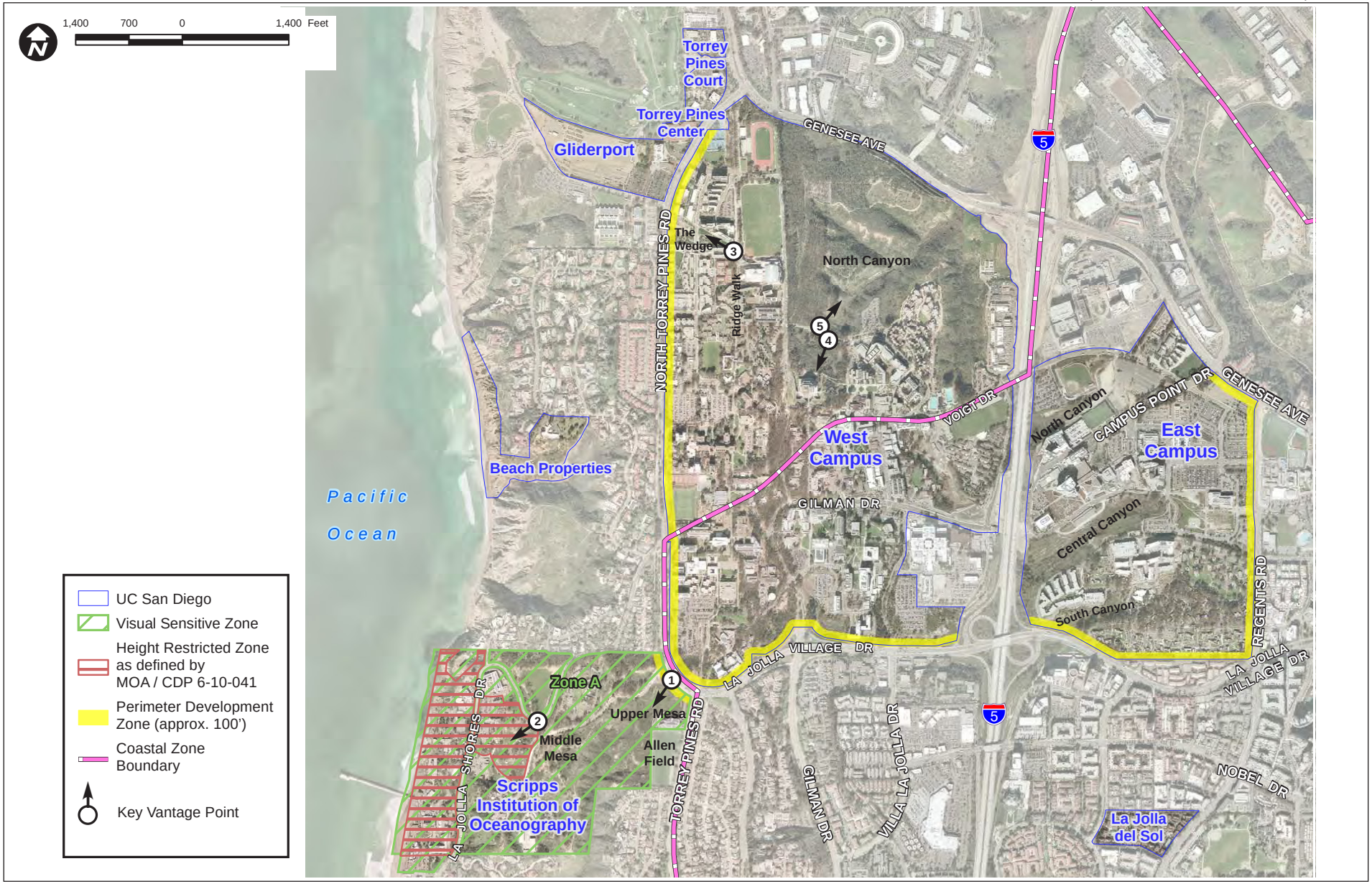
Key Vantage Points

The KVPs on campus are shown on Figure 3.1-1 in this SEIR and representative photographs from the KVPs are shown on Figures 3.1-3 through 3.1-5 of the 2018 LRDP EIR. These KVPs are located throughout the West Campus and SIO and are accessible by students and employees, as well as the general public. These KVPs include:

KVP 1 is on UC San Diego property along North Torrey Pines Road, between Expedition Way and Torrey Pines Road, looking southwest. The foreground and mid-ground views from this location include the undeveloped portions of SIO with non-native grassland and natural vegetative habitat, with background views of the Pacific Ocean and horizon views of Mount Soledad.

KVP 2 is located along La Jolla Shores Drive to the southwest of the Coast Apartments in SIO. This KVP is looking southwest toward the Pacific Ocean from the public sidewalk along La Jolla Shores Drive. The Pacific Ocean and La Jolla shoreline are visible from KVP 2. While some intervening vegetation and buildings are present, the campus recently cleared some trees and is installing a viewing overlook off La Jolla Shores Drive.

KVP 3 is located on Ridge Walk, which is an on-campus pedestrian walkway that runs in a north-south direction parallel to, and east of, North Torrey Pines Road from North Point Drive to the north, to Revelle Plaza at the southern end. It is on a ridge approximately 100 feet above the surrounding portions of the mesa. For the most part, views from the Ridge Walk looking northwest are blocked by development and landscaping. However, this KVP has intermittent partial



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Source: UC San Diego 2018

HELIX Environmental Planning

Campus Visual Resources

Figure 3.1-1

background views of the ocean at the northern end of the Ridge Walk between buildings associated with Eleanor Roosevelt College and Rady School of Management. This ocean view, although partially obstructed, is considered a scenic vista because of the visual assets associated with the ocean.

KVP 4 is a representative view from Voigt Drive oriented southwest toward the Geisel Library. The foreground view of KVP 4 is made up of natural and disturbed habitat with the Geisel Library elevated from the viewer's position, providing a dramatic structure that terminates the view.

KVP 5 provides a representative view of North Canyon from Voigt Drive toward Genesee Avenue to the northeast across the UC San Diego Open Space Preserve. The foreground and mid-ground views include native vegetation and eucalyptus groves, steep topography, and some exposed bluffs.

KVPs 1 through 4 have not changed since preparation of the 2018 LRDP EIR. However, the completion of Franklin Antonio Hall in 2022 has partially obstructed views to the northeast, modifying KVP 5. This KVP, which looks north from Voigt Drive towards the UC San Diego Open Space Preserve and distant mountain ranges to the north and east, has been partially affected by the new development.

3.1.1.4 VISUALLY SENSITIVE AREAS SURROUNDING CAMPUS

Certain areas surrounding the campus are considered visually sensitive due to factors such as their proximity to the campus, views of the campus, views of the nearby ocean or mountains, and/or their designation as scenic areas in relevant community plans. Conversely, other areas are not considered visually sensitive if they lack direct views of the campus, are not identified as scenic resources in relevant community plans, are situated in highly urbanized areas, and/or are primarily interior-oriented land uses. This section discusses the off-campus visual character, including contributing elements such as landform, vegetation, development, and the sensitivity of public viewers within these areas.

North of West Campus

Views of the campus from the north have not substantially changed since the preparation of the 2018 LRDP EIR, and this area is not considered visually sensitive to changes in visual character on campus due to uneven topography and obstruction.

South of West Campus

Views of the campus from south of West Campus have not substantially changed since preparation of the 2018 LRDP EIR. The Open Space Preserve along the southern campus boundary continues to provide a permanent, visual landscape buffer between land uses on and off campus. The area south of West Campus is not considered sensitive from a visual standpoint because the developments are visually interior-oriented land uses located in a highly urbanized area with limited views of the campus.

Near East Campus

Views of the campus from near East Campus have not substantially changed since preparation of the 2018 LRDP EIR. These areas are not considered particularly sensitive from a visual standpoint

because they are medium to high density, visually interior-oriented land uses located in a highly urbanized area with limited views of the campus.

I-5 Corridor

Since preparation of the 2018 LRDP EIR, the new UC San Diego Blue Line Trolley extension was completed, the Gilman Drive Bridge, and the Pepper Canyon West Living and Learning Neighborhood were constructed. These developments are visible from the I-5 freeway travel lanes. However, users of this freeway travel at speeds of approximately 65 miles per hour (mph) and pass by these land uses in a matter of seconds. Because of the limited on-campus views and duration of viewing time, this area continues to be only moderately visually sensitive to changes in visual character on campus.

West of West Campus

As stated in the 2018 LRDP EIR, the La Jolla and University Community Plans designate a section of North Torrey Pines Road as offering an intermittent or partial scenic vista. These plans also recognize a viewshed from Torrey Pines City Park that looks towards the west. Additionally, the La Jolla Community Plan identifies several locations along La Jolla Farms Road as scenic overlooks with intermittent or partial western vistas. These designations focus primarily on the westward ocean views rather than views toward the UC San Diego campus.

3.1.1.5 LIGHT AND GLARE

As stated in Section 3.1.1.5 of the 2018 LRDP EIR, the UC San Diego campus is located in a highly urbanized area with numerous sources of light and glare, including buildings, streetlamps, parking structures, and vehicle headlights. Lower-density residential areas to the south and west of West Campus, as well as higher-density commercial and residential developments to the south and east of East Campus, contribute to elevated levels of existing ambient light. Glare can result from reflective building materials and vehicle windshields. Sensitive viewers include UC San Diego students, faculty, staff, and visitors, as well as wildlife on campus. For further discussion on potential impacts of light on wildlife, see Section 3.3, Biological Resources, of this SEIR.

3.1.2 REGULATORY FRAMEWORK

As with the 2018 LRDP EIR, there are no federal regulations specifically applicable to the Update to the 2018 LRDP regarding aesthetics. Applicable state, UC San Diego, and non-regulatory local regulations, policies, and programs are described in detail in Section 3.1.2, Regulatory Framework, of the 2018 LRDP EIR. The following section focuses on new or updated regulations and guidance that have occurred since certification of the 2018 LRDP EIR.

3.1.2.1 STATE

U.S. Census Bureau

The Census Bureau's urban areas represent densely developed territory, and encompass residential, commercial, and other non-residential urban land uses. The Census Bureau defines urban areas after each decennial census using specific criteria based on census data and other

sources. Rural encompasses all population, housing, and territory not included within an urban area.

For the 2020 Census, an urban area comprises a densely settled core of census blocks that meet minimum housing unit density and/or population density requirements. This includes adjacent territory containing non-residential urban land uses. To qualify as an urban area, the territory identified according to criteria must encompass at least 2,000 housing units or have a population of at least 5,000 (U.S. Census Bureau 2022).

California Coastal Act

Approximately 50 percent of the UC San Diego La Jolla campus is located within the Coastal Zone and therefore development within this area is regulated by review and approval by the CCC through the California Coastal Act (CCA). All of SIO, the Mount Soledad property, the UC San Diego beachfront and surrounding properties, the Gliderport area, and a significant portion of West Campus are within the Coastal Zone (see Figure 3.1-2 of the 2018 LRDP EIR, reproduced in this SEIR as Figure 3.1-1). The goals of the CCA include protecting, conserving, enhancing, and restoring coastal areas; maximizing public access to the coast and ocean; and protecting environmentally sensitive habitats.

The CCA provides for the protection of sensitive coastal areas containing scenic and visual qualities. The CCA identifies sensitive coastal areas as those identifiable and geographically bounded land and water areas within the Coastal Zone of vital interest and sensitivity. Sensitive coastal areas include highly scenic resources. Section 30251 of the CCA provides protection for the scenic and visual qualities of coastal areas in pertinent part as follows:

> *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas.*

The CCA has undergone updates since preparation of the 2018 LRDP EIR, most recently in 2024. These updates have included adjustments to the Coastal Zone boundary, though the boundary within the UC San Diego La Jolla campus has not changed since the 2018 LRDP EIR was prepared.

California Environmental Quality Act Guidelines

In 2019, the CEQA Guidelines were updated within the Aesthetics section of Appendix G to clarify that only public views (those that are experienced from publicly accessible vantage points) were subject to analysis per CEQA. Further, within urbanized areas, analysis should focus on whether a project would conflict with zoning and applicable regulations governing scenic quality. Per Section 15387 of the CEQA Guidelines, an "Urbanized area" means a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile. A Lead Agency shall determine whether a particular area meets the criteria in this section either by examining the area or by referring to a map prepared by the U.S. Bureau of the Census which designates the area as urbanized.

Senate Bill 743

In September 2013, the Governor's Office signed Senate Bill (SB) 743 into law, which made several changes to CEQA for projects located in areas served by transit (i.e., transit-oriented development or TOD). With respect to aesthetics, SB 743 (PRC Section 21099, Subdivision [d]) provides that aesthetic impacts shall not be considered significant impacts on the environment, in some circumstances. Specifically, Section 21099(d)(1) provides that aesthetics impacts shall not be considered significant CEQA impacts of a project that meets the following criteria:

1. The project is a residential, mixed-use residential, or employment center project.

2. The project is located on an infill site within a Transit Priority Area (TPA).

A TPA is defined as an area within one-half mile of a major transit stop, such as a rail transit station or intersection of two major bus routes. Per the City of San Diego's map of TPAs per SB 743 (City 2022), the majority of the UC San Diego La Jolla campus falls within a TPA. Areas outside of a TPA on the campus include parts of SIO and the University House and Beach Properties (see Figure 3.1-2, *Transit Priority Areas*).

3.1.2.2 UC SAN DIEGO

The Outdoor Lighting Policy has not been updated since 2009, and therefore is not added here.

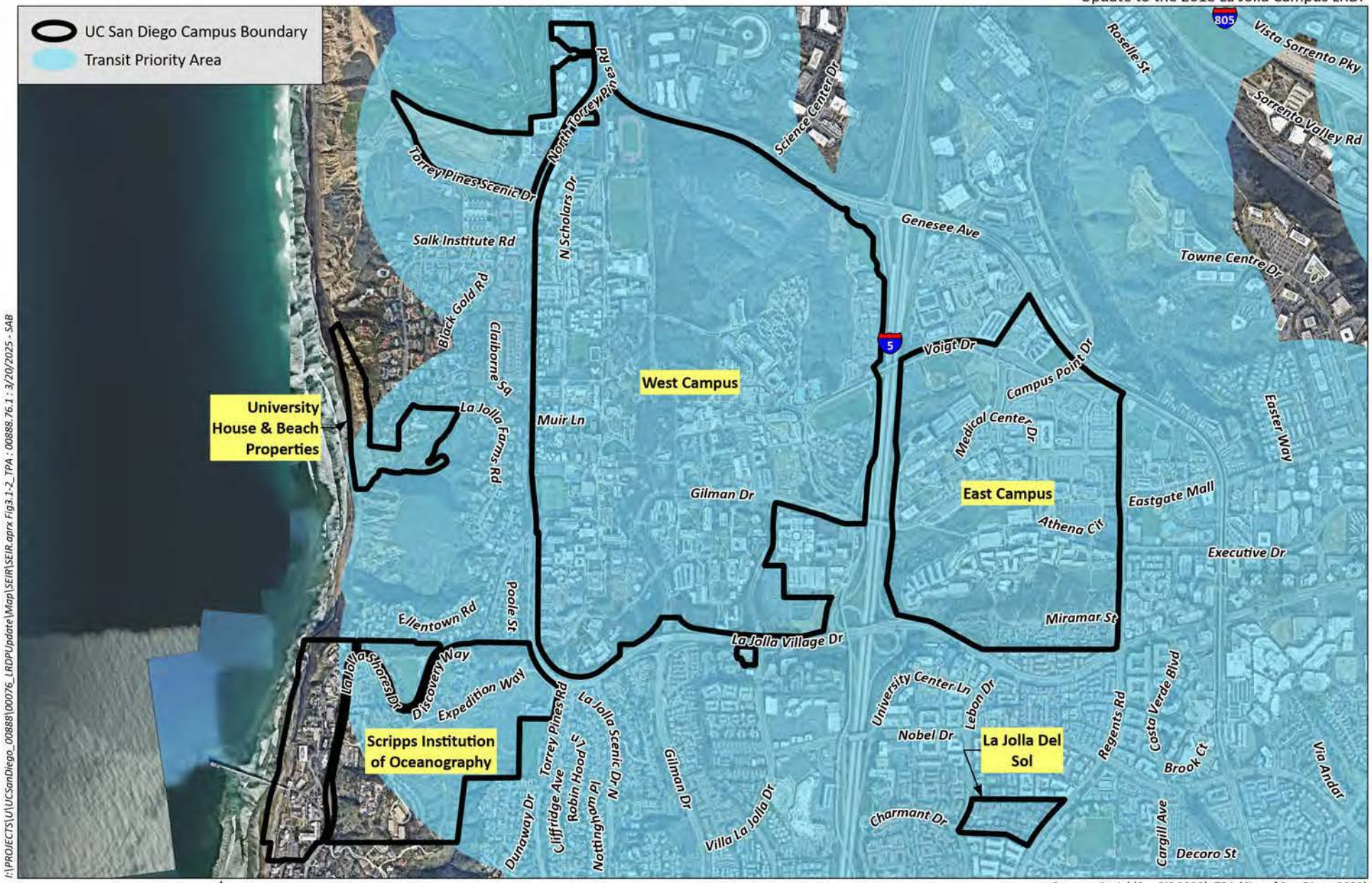
Design Guidelines (2025)

The UC San Diego Design Guidelines were updated in 2025, and multiple prior updates to individual chapters have occurred since preparation of the 2018 LRDP EIR as necessary (UC San Diego 2025).

In January 2024, updates to the Design Guidelines included modifications to building requirements, including architecture and mechanical standards. These updates align the Design Guidelines with the UC Sustainable Practices Policy and affect Chapter 1.02 (General Guidelines), Chapter 3.01 (Architecture), and Chapter 3.02 (Mechanical). Additionally, Chapters 3.05, 3.06, and 3.07, which outline specifications for interior and exterior lighting, were last updated in 2018.

In February 2025, updates included clarifications regarding the process that projects must go through as part of Design Review. Campus Planning is responsible for overseeing land use planning for the UC San Diego campus and site planning for capital improvement projects. Included within this scope of responsibility is urban planning, landscape planning, environmental compliance, signage, and implementation of the La Jolla campus's 2018 LRDP (including the Update to the 2018 LRDP, if approved). Campus Planning also provides oversight of the process and production of neighborhood and district planning studies that extend, refine and, when necessary, amend the land use and design guidelines set forth in the campus' Physical Design Framework.

Prior to project approval, any proposed project that may affect the visual character of the campus undergoes design review by the UC San Diego Design Review Board (DRB). This ensures that the design is consistent with the surrounding environment and development. The review process considers factors such as building size, shape, proportion, roof profile, architectural details, materials, colors and landscaping, including both landscape features and structures.



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Source: Aerial (SanGIS 2023); TPA (City of San Diego 2022)

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Transit Priority Areas

Figure 3.1-2

Projects within SIO and the PDZ are also reviewed by Campus Planning staff, the DRB, the Campus Architect, and other relevant campus committees at the conceptual design stage. This ensures that projects integrate pedestrian scale features and align with campus planning principles. Project design teams are expected to incorporate the following elements along façades facades facing the public realm, as applicable:

- Pedestrian-oriented architectural details and scale;
- Proportional structural mass, form, and roof profiles;
- Building setbacks, fenestration, and visual reliefs;
- Utilization of existing topography to create softer transitions between on- and off-campus development;
- Use of high-quality and sustainable building materials;
- Welcoming and wayfinding elements;
- Pedestrian connections and pathways that consider adjacent existing and planned features;
- Pedestrian furniture and signage;
- Preservation or addition of landscape buffers, trees, and other screening features;
- Minimal use of walls or pedestrian barriers; and
- Consideration of relevant City of San Diego plans to avoid or reduce potential conflicts with planned off-campus infrastructure.

Historic Grove & Urban Forest Land Use Guidelines (2021)

The Historic Grove & Urban Forest Land Use Guidelines were prepared in 2021 to provide guidelines, policies, and the campus review process for development within or near the Historic Grove and Urban Forest. This area consists of approximately 92 acres and includes large stands of trees in the western portion of the main campus, stretching from Genesee Avenue to the northern end of SIO (as shown on Figure 2-4 of this SEIR).

Per the Guidelines, new developments in the Historic Grove and Urban Forest are prohibited where no facilities currently exist. Expansion of existing facilities in the Historic Grove and Urban Forest are strongly discouraged and should only be considered if there is a compelling programmatic justification. In cases where expansion of existing facilities is unavoidable, expansion will be subject to the following guidelines related to scale and design:

- An existing paved area, such as a patio, may be enclosed.
- A second story addition may be built over the existing first floor with the intent of maintaining an intimate scale.
- Limited encroachment on unpaved areas should be determined on a case-by-case basis and may be permitted when impacts are minimized and the location is justified, subject to the “no net loss” policy.
- The maximum height of buildings should not exceed tree height and should be determined on a case-by-case basis. For example, a second story addition over an existing single-story

building would be limited to the same floor to floor height, excluding parapet and mechanical screens.

- Building mass should be articulated to avoid large, continuous facades with the intent for the building to appear "set in a grove of trees."
- Building additions should generally be oriented so that the narrow sides face public roads and prominent pedestrian paths, such as Library Walk, to enable views into the trees and prevent a "walled edge."
- Mechanical rooftop equipment should be concealed and set back at least 10 feet from the parapet of flat roofs and screened in a manner appropriate to the overall building design.

Physical Design Framework (2021)

The 2021 Physical Design Framework incorporates policies within the 2018 LRDP for the La Jolla campus and the 2019 LRDP for the Hillcrest campus. It provides a synopsis and hierarchy of the land use plans and design that guide development on the campuses.

3.1.2.3 LOCAL (NON-REGULATORY)

As previously discussed in Section 1.0, Introduction, of this SEIR, UC San Diego is part of the UC, a constitutionally created State entity, and is not subject to municipal regulations of surrounding local governments, such as the City of San Diego General Plan or land use ordinances, for uses on property owned or controlled by the UC that are in furtherance of the UC's education, research, and public-service purposes. However, UC San Diego may consider, for coordination purposes, aspects of local plans and policies for the communities surrounding the campus when it is appropriate and feasible, but it is not bound by those plans and policies in its planning efforts. The two City of San Diego community plans that apply to areas adjacent to the campus include the La Jolla Community Plan and Local Coastal Program Land Use Plan and the University Community Plan. For a description of the La Jolla Community Plan, see Section 3.1.2.3 of the 2018 LRDP EIR, since it has not changed since 2014. The University Community Plan was updated in 2024, as described below.

University Community Plan

The 2016 University Community Plan is described in Section 3.11.2.1 of the 2018 LRDP EIR. The University Community Plan was amended multiple times since the 2018 LRDP EIR to allow increased development densities on certain parcels in the community planning area (CPA), none of which are included in the planning area of the Update to the 2018 LRDP. On July 30, 2024, the University Community Plan Update was approved by the City, and it became effective on December 1, 2024, for areas not included in the Coastal Zone. In general, the community goals reflect a shift from car-oriented to transit-oriented design.

Figure 6 of the Community Plan includes a map of urban design recommendations and identifies key corridors and gateways. The intersection of La Jolla Village Drive and Genesee Avenue is identified as a distinct gateway to the core of the community. The strong visual presence of the Trolley platforms and the pedestrian bridges that cross the intersection provide a unique opportunity to highlight this key node in the community. The Plan recommends using lighting, signage, art, and landscaping to enhance and highlight these structures as visible landmarks that define the community core.

3.1.3 PROJECT IMPACTS AND MITIGATION

3.1.3.1 ISSUE 1 — SCENIC VISTAS

Aesthetics Issue 1 Summary

Would implementation of the Update to the 2018 LRDP have a substantial adverse effect on a scenic vista?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Preserving and enhancing views with design features (Aes-1).

Summary of Analysis in the 2018 LRDP EIR

Section 3.1.3.1 of the 2018 LRDP EIR concluded that development within the PDZ—a 100-foot buffer zone along the western and southern boundaries of West Campus and the eastern and southern boundaries of East Campus—could potentially impact scenic resources depending on its configuration, massing, or design features. Additionally, intermittent or partial vistas from east of La Jolla Shores Drive at SIO could be altered from development associated with the proposed 2018 LRDP. Impacts would be potentially significant. Mitigation measure Aes-1 was identified in the 2018 LRDP EIR to address potential impacts associated with scenic vistas within or adjacent to any of the KVPs or the Visual Sensitive Zone. Implementation of mitigation measure Aes-1 would reduce impacts to a level that is less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated development densities and land use designations have changed since preparation of the 2018 LRDP EIR that may affect building mass and height on the campus, and revisions to the 2018 LRDP EIR are necessary.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

No new scenic vistas have been designated since the 2018 LRDP EIR was prepared and no substantial changes to the circumstances or new information of substantial importance have occurred with respect to scenic vistas.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in a substantial adverse effect on a scenic vista. For the purposes of this analysis, adverse effects on scenic vistas are identified when there is a potential to block and/or degrade views of scenic resources. Note that only public views (those that are experienced from publicly accessible vantage points) are subject to analysis per CEQA.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The analysis below evaluates potential impacts in relation to the KVPs identified in the 2018 LRDP EIR, as well as other surrounding areas deemed sensitive due to their proximity to the campus, views of the campus, views of the nearby ocean and/or mountains, and/or designation as scenic areas within one or more of the relevant community plans. The same KVPs identified in the 2018 LRDP EIR are assumed to be applicable, with a slight modification to KVP 5 identified above.

Impact Analysis

Implementation of the Update to the 2018 LRDP would result in new development and redevelopment of UC San Diego-owned property, which would increase density and could include taller buildings, which may have an adverse effect on scenic vista(s) on and around campus. As described previously, there are five KVPs identified on campus that are considered scenic vistas. An analysis of future development impacts to these scenic vistas is provided below.

Perimeter Development Zone

As a tool for addressing aesthetic impacts, UC San Diego designated in the 2018 LRDP a roughly 100-foot buffer PDZ along the western and southern boundaries of West Campus, and the eastern and southern boundaries of East Campus (Figure 3.1-1). The PDZ was established to identify the areas of campus where future development under the proposed 2018 LRDP would be most visible to the surrounding community.

New construction proposed as part of the Update to the 2018 LRDP could occur within the PDZ, including development as part of the West Campus development program (along North Torrey Pines Road) and the Mesa Housing development program (along La Jolla Village Drive). This development could have the potential to impact scenic resources depending on the configuration, massing and/or design features; therefore, under the Update to the 2018 LRDP, special consideration would be given to building placement, architecture (including building setbacks and massing), and landscaping within the PDZ to help preserve or enhance scenic resources.

Development within the PDZ would be reviewed by UC San Diego staff and committees, including the DRB, to evaluate compatibility of site design and architecture and to avoid substantial impacts to scenic resources, as described in Section 3.1.3.2 under Issue 2.

KVPs

KVP 1: There are no proposed changes to development in the SIO area as part of the Update; therefore, scenic views within this KVP would not be affected. No impact would occur.

KVP 2: There are no proposed changes to development in the SIO area as part of the Update; therefore, scenic views within this KVP would not be affected. No impact would occur.

KVP 3: KVP 3, or the Wedge, provides views from Ridge Walk to the Pacific Ocean. Under the Update to the 2018 LRDP, the Torry Pines research project (WC1) would be located in the Torrey Pines Gliderport area and would be visible from this KVP. Therefore, depending on the details of the proposed development, implementation of the proposed Update to the 2018 LRDP could have a substantial adverse effect on views from Ridge Walk across the Wedge and to the Pacific Ocean. Impacts associated with scenic views from KVP 3 would be potentially significant.

KVP 4: KVP 4 is a view of the Geisel Library from the northeast (from Voigt Drive looking southwest) and is characterized as dramatic and expansive, as noted above under Existing Conditions. There are no proposed changes to campus development within this area that would alter views from KVP 4. No impact would occur.

KVP 5: KVP 5 consists of northeasterly views from Voigt Drive of the North Canyon and Palomar Mountain in the background. The proposed Update to the 2018 LRDP includes one project, WC3, an electrical substation, that may be located directly south of Genesee Avenue, in the northwesterly corner of North Canyon Open Space Preserve. No other development is proposed in the Open Space Preserve. However, as the primary views from this location are northeast, it is not expected that key scenic views would be blocked or substantially degraded. Impacts would be less than significant.

Scenic Vistas and Visual Resources Identified in Surrounding Community Plans

Community plan policies were reviewed to assess whether future UC San Diego development would substantially obstruct designated public views or scenic resource as identified in those plans.

The 2014 La Jolla Community Plan and Local Coastal Program Land Use Plan identifies four viewsheds, two road segments from which a coastal body of water can be seen, three roadways with intermittent or partial vistas, one view cone, and numerous scenic overlooks within or near SIO and the area west of West Campus. These features are depicted in Figure 9, Identified Public Vantage Points, of the 2014 Plan (City 2014). The University Community Plan does not officially designate vantage points, or viewsheds, although it does contain policies to protect visual resources, as discussed above. However, UC San Diego property is part of the UC, a constitutionally created entity of the State of California. As a state entity, UC is not subject to municipal plans, policies, and regulations, such as the City of San Diego's General Plan or the surrounding community plans. Therefore, while these plans provide guidance for the analysis of impacts to visual resources, they are intended to be used for advisory purposes only.

Implementation of the Update to the 2018 LRDP would not result in development that would adversely impact the designated viewsheds from Torrey Pines City Park and Scripps Coastal Reserve, as the campus is situated east of these scenic vantage points, which face westward toward the Pacific Ocean, and the Update does not propose development within these protected viewsheds. The viewshed identified along Biological Grade is located around land designated as Open Space Preserve, which would not be developed under the proposed Update to the 2018 LRDP. The viewshed at Allen Field is east of SIO and south of the Venter Institute building; however, no new development is proposed within SIO as part of the Update to the 2018 LRDP. Therefore, views from the Allen Field viewshed would not be altered. No impact would occur to any of the viewsheds designated in the La Jolla Community Plan and Local Coastal Program Land Use Plan.

Intermittent or partial vistas were identified along North Torrey Pines Road and La Jolla Farms Road, but any development that would occur as a result of the proposed Update to the 2018 LRDP would be to the east of these roads and would not impact the vistas, as views from these areas generally look west. No impact would occur.

The scenic overlooks and intermittent or partial vistas identified along La Jolla Farms Road are located to the east of the UC San Diego beachfront properties and Scripps Coastal Reserve. Implementation of the Update to the 2018 LRDP would not result in development within the beachfront properties, as this area is designated as Open Space Preserve, and would also not result in development within Scripps Coastal Reserve. The scenic overlooks identified along La Jolla Shores Lane and Ellentown Road and the view cone near La Jolla Shores Lane are located to the southeast of Scripps Coastal Reserve, to the southwest of West Campus, and to the north of SIO. Development within Scripps Coastal Reserve and SIO is not proposed by the Update to the 2018 LRDP, and campus development within West Campus would not block views from these westward-facing scenic overlooks. Bordeaux Avenue was also identified as a scenic overlook; however, there are currently no public views of the Pacific Ocean from this location due to intervening residential development and vegetation. No impact would occur to any of the roadways, view cones, or scenic overlooks designated in the La Jolla Community Plan and Local Coastal Program Land Use Plan.

Summary

The Update to the 2018 LRDP could result in a substantial adverse effect on a scenic vista compared to what was planned in 2018. Specifically, development projects associated with the Update to the 2018 LRDP could affect views from publicly accessible areas (specifically KVP 3) through the alteration of natural topography, vegetation, and/or development character. Mitigation measure Aes-1 was identified in the 2018 LRDP EIR to provide a general framework for addressing impacts associated with potential future development projects relating to implementation of the 2018 LRDP. This mitigation framework (revised as described below) can be applied to all projects implemented as part of the Update to the 2018 LRDP that have the potential for scenic view impacts as a means for avoiding and/or mitigating those impacts. As individual projects associated with the Update to the 2018 LRDP have the potential to vary with respect to scope, scale, and impact, the type and amount of mitigation needed will vary based on the nature of the project as well as the specific impact(s) being addressed. Development under the Update to the 2018 LRDP would be required to implement the mitigation framework outlined in Aes-1.

Level of Significance Before Mitigation

As described above, the impact would be potentially significant before mitigation, consistent with the conclusion in the 2018 LRDP EIR. Therefore, the following mitigation measure will be implemented.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

See below for edits to mitigation measure Aes-1.

New and/or revised mitigation measures for the Update to the 2018 LRDP SEIR:

Measure Aes-1 has been revised to provide additional clarification and guidance for design requirements. The proposed revisions are not associated with a new impact under the Update to the 2018 LRDP.

Aes-1 **Design Requirements.** For projects with potential to adversely affect a scenic vista or sensitive views denoted by the Visual Sensitive Zone or a KVP, UC San Diego Campus Planning staff shall identify potentially affected views and vistas in the project planning process and provide recommendations to reduce impacts. These recommendations shall be implemented during the project design phase and made condition of project approval, in coordination with the project design team, campus Design Review Board (DRB), Campus Architect, and other relevant campus committees~~, shall implement the following design requirements at the project planning and design phases to reduce impacts to scenic vistas and sensitive views on the campus and surrounding area~~. Requirements shall include, as applicable:

- Future development in the vicinity of KVP 1 in the SIO Upper Mesa shall allow for a westward view corridor through the site as recommended in the SIO Physical Planning Study (Walker-Macy, March 2017);
- Buildings and structures shall be sited to blend or step with the slope or natural topography;
- Placement of traditionally roof-mounted equipment shall be explored on the ground or, if an on-grade configuration is not feasible, roof-mounted so that views are not obstructed and equipment is screened by structure and/or landscape treatments;
- Building and structure mass and/or proportion shall be ~~altered~~ sculpted to reduce obstruction of the sensitive landscape or scenic vista;
- Exterior treatments and/or colors shall be selected that reduce visibility or contrast with surrounding visual character so as not to detract from sensitive vistas;
- Viewing areas and/or windows within or through the potential development shall be provided to enhance viewing opportunities; and
- Landscape shall be designed consistent with the physical setting and in a manner that enhances ~~reduces~~ scenic vistas.

To ~~determine if an~~ establish that any impact will be less than significant with incorporation of the above measures, a site-specific visual analysis shall be conducted at the planning and design phases by the project design team and approved by Campus Planning. The analysis shall include visual aids such as a topographic cross-section, architectural rendering, or a massing model photo simulation(s) prepared to illustrate the extent to which the proposed building(s) or development(s) would obstruct the scenic view. Topographic cross-sections that include the height of the proposed building(s) or structure(s) and proposed grading or temporary installation of story poles are commonly used to illustrate the extent of potential line-of-sight obstructions resulting from the future development of a project. The analysis shall be implemented to reduce impacts to a less than significant level.

Level of Significance After Mitigation

Implementation of mitigation measure Aes-1 as revised would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

3.1.3.2 ISSUE 2 — CONFLICT WITH ZONING AND OTHER REGULATIONS FOR SCENIC QUALITY IN URBANIZED AREAS

Aesthetics Issue 2 Summary

Would implementation of the Update to the 2018 LRDP conflict with applicable zoning and other regulations governing scenic quality in an urbanized area?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

Section 3.1.3.2 of the 2018 LRDP EIR evaluated the impacts of campus growth under the 2018 LRDP on visual character and quality. The analysis discussed impacts associated with degrading the existing visual character and quality on the campus and surrounding areas. It did not distinguish between urbanized and non-urbanized areas, as this was not part of the CEQA threshold question at

the time. Nevertheless, the analysis did include a summary of consistency with relevant policies related to visual quality.

Because the UC is a statewide entity, it was and still is not subject to local zoning and regulations, however, impacts were analyzed with respect to University policies. It was concluded that development proposed within the PDZ could potentially degrade the visual character of the campus and surrounding areas through their alteration of natural topography, vegetation, and/or development character. Mitigation measures Aes-2A (requiring projects to undergo design review by the Design Review Board) and Aes-2B (requiring projects within SIO and the PDZ to undergo review by the DRB, Campus Architect, and other relevant campus committees to ensure that they incorporate design features along the facades of structures facing the public realm) were identified to reduce impacts to a less than significant level.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated development densities and land use designations have changed since preparation of the 2018 LRDP EIR, and revisions to the 2018 LRDP EIR are necessary.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP is undertaken or new information of substantial importance.

Standards of Significance

As noted in the Regulatory Framework, the CEQA Guidelines were updated in 2019 within the Aesthetics section of Appendix G to clarify that only public views (those that are experienced from publicly accessible vantage points) were subject to analysis per CEQA. Further, within urbanized areas, the analysis should focus on whether a project would conflict with zoning and applicable regulations governing scenic quality. Per Section 15387 of the CEQA Guidelines, an "Urbanized area" means a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile.

According to the City of San Diego, the community of La Jolla contains approximately 32,000 residents and the community of University City contains approximately 56,000 residents (City 2024). The UC San Diego La Jolla campus would be appropriately defined as an urbanized area per the definition established by the U.S. Census Bureau and the CEQA Guidelines described in Section 3.1.2.1 above. Further, as previously discussed in Section 1, *Introduction*, of this SEIR, UC San Diego is part of the UC, a constitutionally created State entity, and is not subject to municipal regulations of surrounding local governments, for uses on property owned or controlled by the UC that are in furtherance of the UC's education purposes. Therefore, the Update to the 2018 LRDP is evaluated relative to consistency with applicable UC or UC San Diego guidelines and standards governing scenic quality.

Analysis of the Update to 2018 LRDP

Assumptions and Methodology

In relation to conflicting with applicable zoning and other regulations governing scenic quality, the appropriate regulations are those that are promulgated by UC San Diego, the CCC, and the State. Campus development is guided by the Update to the 2018 LRDP and associated land use plan and UC land management policies. The discussion below focuses on the compatibility of the proposed Update (e.g., increased density of development, refinement to the land use plan) with the applicable policies governing scenic quality described in Section 3.1.2 above.

Impact Analysis

Projects developed under the Update to the 2018 LRDP would consist of infill development (construction of buildings or other facilities on previously unused or underutilized land) within existing developed campus boundaries (which, as noted above, is designated as an urbanized area as defined by the CEQA Guidelines) and would be required to comply with the appropriate land use designation. The following analysis considers whether the Update to the 2018 LRDP would conflict with applicable regulations governing scenic quality, including the CCA, SB 743, and campus policies. The analysis also includes an assessment of local community policies for informational purposes.

California Coastal Act

As noted in the Regulatory Framework, the CCA provides for the protection of sensitive coastal areas containing scenic and visual qualities of coastal areas. Similar to the 2018 LRDP, UC San Diego has elected not to submit the Update to the 2018 LRDP to the CCC for certification as allowed under PRC Section 30605 and instead will continue to submit individual projects within the Coastal Zone to the CCC on a project-by-project basis to assess compliance with the CCA.

Potential new development proposed as part of the Update to the 2018 LRDP that is within the Coastal Zone includes projects within the following areas of the West Campus: North Campus, Muir College, Warren College, and the Campus Services Complex. Projects within these areas may require issuance of a CDP depending on the specifics of the project proposal and would require a consistency review with the CCA. Projects subject to a CDP would be required to be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas. Therefore, impacts would be considered less than significant.

SB 743

As noted in the Regulatory Framework, per SB 743, a project's aesthetic impacts are not considered significant if it is a residential, mixed-use residential, or employment center project and is located on an infill site within a TPA (within 0.5 mile of a major transit stop). Most of the UC San Diego La Jolla campus is within a TPA as defined by SB 743, the exceptions being areas within SIO, the Beach Properties, and University House (see Figure 3.1-1). The development being proposed as part of the Update to the 2018 LRDP is within a TPA. Therefore, provided that an individual project's land use includes residential, mixed-use residential or an employment center project, pursuant to the

requirements for exemption under SB 743, aesthetics impacts from the Update to the 2018 LRDP would not be considered significant.

UC San Diego Design Guidelines

Implementation of the Update to the 2018 LRDP could result in development that increases density or changes land uses compared to the 2018 LRDP. Areas within the Update that may include intensified development or land use updates compared to the 2018 LRDP are described below. Refer to Figure 2-5 of this SEIR for reference.

North Campus: Intensified development within this area would include the North Point (WC2) development site, where the land use would be changed from Academic to Sports and Recreation and the electrical substation project (WC3), which would include removal of an area of Urban Forest within the Open Space Preserve in the North Canyon along Genesee Avenue for redevelopment with above-ground utilities.

West Campus: The area along North Torrey Pines Road, south of Pangea Drive, and west of Scholars Drive North is proposed for redevelopment with housing uses (WC5). . While this development area was included as part of the 2018 LRDP, development within this site could be intensified, increasing the overall square footage and number of beds.

Muir and Revelle College Neighborhoods: Redevelopment for the proposed West Campus Academic Site 2 (WC7) and the Triton Recreation Center (WC8) would be intensified compared to what was planned in the 2018 LRDP, increasing the overall size.

University Center Neighborhood: Redevelopment of the University Center (WC9) with academic/research uses was included in the 2018 LRDP, but would result in increased square footage as part of the Update to the 2018 LRDP.

Health Sciences West District: Redevelopment with academic/research uses is proposed along Gilman Drive as part of the Health Sciences Academic 2 project (WC16), which was not included in the 2018 LRDP. In addition, Health Sciences Academic 3 (WC17) and Health Sciences Academic 4 (WC18), proposed along Villa La Jolla Drive, would include academic and research uses. Also, if required as part of mitigation measure Util-1 (see Section 3.1.2, *Public Services*, of this SEIR), a wastewater treatment plant (WC19) may be constructed along La Jolla Village Drive. These four project sites were not included in the 2018 LRDP.

Warren College Neighborhood: As part of the Update to the 2018 LRDP, higher density student housing is proposed as a redevelopment of the existing Warren College Housing, east of Franklin Antonio Hall, adjacent to the North Canyon Ecological Reserve, along Voigt Drive and Justice Lane as part of the West Campus Housing 2 project (WC10).

Pepper Canyon District: New student housing and mixed-use is proposed along Pepper Canyon Drive to replace the existing low-density housing. The projects include Pepper Canyon East Housing (WC13) and Pepper Canyon East Hotel (WC14). While the student housing project was included in the 2018 LRDP, the Update includes increased square footage, beds, and recreation/ open space adjustments. The proposed hotel and retail uses are new compared to the 2018 LRDP. In addition, expansion of the Canyonview Recreation Center is proposed (WC12) as part of the Update to the 2018 LRDP.

Campus Services Complex: The parking lot north of Voigt Drive is proposed to be redeveloped with general service land uses as part of the Campus Services South project (WC11). This project site is new compared to what was planned in the 2018 LRDP.

East Campus: Areas within East Campus are proposed to be redeveloped with clinical/research, community, and academic/research uses as part of the Update to the 2018 LRDP. Specifically, an outpatient pavilion medical office building may be developed where a surface parking lot currently exists along Campus Point Drive in addition to a multi-story in-patient bed tower to be located west of Jacobs Medical Center. New projects that were not included in the 2018 LRDP are the Inpatient Bed Tower (EC1), East Campus Clinical/Research 1 project (EC3), East Campus Clinical/Research 2 (EC4) project, the East Campus Clinical/Research 4 (EC6) project, and the Preuss Expansion project (EC7). The Outpatient Pavilion (EC2) and East Campus Clinical/Research 3 (EC5) were included but the Update proposes an increase in area for those projects.

Mesa Housing: The Update to the 2018 LRDP includes redevelopment of South Mesa Housing (EC9 and EC10) with more dense student housing (increased square footage and number of beds) compared to what was planned in the 2018 LRDP.

Development within these areas, particularly those projects that propose an increase in density, mass, or height, would undergo the Design Review Process as described under the Design Guidelines, which would ensure that impacts related to compliance with regulations governing scenic quality are less than significant.

Visual Sensitive Zone

The Visual Sensitive Zone is within SIO to protect views of the Pacific Ocean. In addition, a portion of SIO is located within a height restricted zone per MOA/ CDP 6-10-041. While the Update to the 2018 LRDP includes land use changes that add area to the Open Space Preserve (restoration lands and ecological reserve) within SIO, it does not include new development within this area. No impacts would occur as a result of the Update to the 2018 LRDP.

Perimeter Development Zone

Development that is new or intensified as part of the Update to the 2018 LRDP that is within the PDZ includes projects within the West Campus along North Torrey Pines Road, Health Sciences projects north of La Jolla Village Drive, and on the East Campus along La Jolla Village Drive. Development within the PDZ would be required to undergo design review by the Campus Architect as well as Campus Planning, as described within the updated Design Guidelines and impacts would be considered less than significant.

Historic Grove & Urban Forest Land Use Guidelines

As noted above, the Historic Grove & Urban Forest Land Use Guidelines provide guidelines for development within or near the Historic Grove and Urban Forest. This forested area is in the western portion of the main campus. The Update to the 2018 LRDP does not include projects located in or adjacent to the Historic Grove. The electrical substation (WC3) would be adjacent to Urban Forest land and would need to comply with these guidelines as part of the design review process; therefore, impacts would be less than significant.

Outdoor Lighting Policy

The UC San Diego Outdoor Lighting Policy (2009) applies to all exterior lighting, whether free-standing or attached to buildings or other structures. The requirements of this policy are supported by the UC San Diego Outdoor Lighting Design Guidelines that provide guidance in the practical implementation of the policy. The primary goal of the policy is to reduce nighttime light pollution radiating from campus facilities to minimally acceptable levels so that local astronomical research is supported and advanced, while ensuring adequate lighting levels for safety and security. All projects constructed as part of the Update to the 2018 LRDP would be required to comply with this policy as part of the campus review process; therefore, impacts would be less than significant.

Other Guidelines Regarding Visual Resources (Non-Regulatory)

University City Community Plan

The latest version of the University City Community Plan (2024) includes several policies that are designed to encourage interconnectivity with the campus. Although the University is not subject to local agency regulations, the Update to the 2018 LRDP promotes the placement of land uses to facilitate the use of transit and alternative transportation; includes land uses that increase density, encourages the conversion of surface parking with parking structures, and promotes a mix of land uses near the Trolley Stations, which is consistent with the goals of the University City Community Plan.

La Jolla Community Plan and Local Coastal Program Land Use Plan

The City of San Diego's 2014 La Jolla Community Plan identifies many goals, policies, and recommendations for development within the Coastal Zone.

Although the University is not subject to local agency regulations, the policies within the La Jolla Community Plan and Local Coastal Program Land Use Plan emphasize the protection of public view corridors, particularly those that have a view of the coastal resources. As noted under Issue 1, implementation of the revised mitigation measure Aes-1 from the 2018 LRDP would ensure that public scenic views are not obstructed. Further, projects within the Update to the 2018 LRDP within the Coastal Zone would be subject to the requirements within a CDP, which would be issued by the CCC specific to each project. Compliance with these requirements would ensure that views to and along the ocean and scenic coastal areas are protected.

Level of Significance Before Mitigation

As described above, development proposed as part of the Update to the 2018 LRDP, particularly those projects that propose an increase in density, mass, or height and are within the PDZ would be subject to design review as described in the updated Design Guidelines. Therefore, under the Update to the 2018 LRDP, impacts are less than significant, which is a reduced impact compared with the 2018 LRDP EIR.

Mitigation Measures

Measures Removed from the 2018 LRDP EIR:

Mitigation measures Aes-2A and Aes-2B required Design Review Board and Campus Architect Review for projects implemented as part of the 2018 LRDP. These processes have been incorporated into the updated campus Design Guidelines and are no longer required as mitigation measures.

Level of Significance After Mitigation

Impacts would be less than significant without mitigation, which is a reduced impact compared to the 2018 LRDP EIR.

3.1.3.3 ISSUE 3 – LIGHTING AND GLARE

Aesthetics Issue 3 Summary

Would implementation of the Update to the 2018 LRDP create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Glare reduction measures (Aes-3); bird-safe building standards (Bio-2H), and light shielding near the Ecological Reserve (Bio-3J).

Summary of Analysis in the 2018 LRDP EIR

Section 3.1.3.3 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP would have the potential to create new sources of substantial light or glare on campus or in the immediate vicinity, which could adversely affect daytime and nighttime views in this area. Mitigation measure Aes-3 was identified in the 2018 LRDP EIR to address potential impacts associated with light and glare associated with parking areas, roads, or structures from vehicle headlights. Implementation of mitigation measure Aes-3 would reduce impacts to a level that is less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated development densities and land use designations have changed since preparation of the 2018 LRDP EIR, and revisions to the 2018 LRDP EIR are necessary.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP is undertaken or new information of substantial importance.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant adverse impact if it would create a new source or substantial light or glare which would adversely affect daytime or nighttime views in the area.

In addition, as described in Section 3.3, Biological Resources, of this SEIR, potential impacts to avian species may result if reflections from glazing or other surface treatments increase the potential for bird strikes on buildings.

Analysis of the Update to 2018 LRDP

Assumptions and Methodology

The analysis focuses on areas within the campus that are targeted for increased density or a change in land use as part of the Update to the 2018 LRDP that may result in potential new sources of light and glare relative to the 2018 LRDP.

Impact Analysis

Implementation of the Update to the 2018 LRDP could result in the development of new structures that would have the potential to increase sources of light and/or glare compared to what was considered in the 2018 LRDP. Areas within the Update to the 2018 LRDP that may include intensified development or land use updates compared to the 2018 LRDP include:

North Campus: Compared to what was planned in the 2018 LRDP, redevelopment of surface parking lots and recreational fields adjacent to North Torrey Pines Road (WC2) could introduce new sources of light and glare from exterior and interior lighting for buildings or parking structures. Removal of an area of Urban Forest within the Open Space Preserve in the North Canyon along Genesee Avenue for redevelopment with the West Campus electrical substation (WC3) could result in new sources of light near biologically sensitive vegetation.

West Campus: The area along North Torrey Pines Road, south of Pangea Drive, and west of Scholars Drive North is proposed for redevelopment with housing uses (WC5), with an increased density compared to the 2018 LRDP. This area is currently developed with structures that include interior and exterior lighting. Redevelopment with higher density housing towers would introduce new sources of light that would be visible to off-campus residential areas to the west of North

Torrey Pines Road and reflections from glazing or surface treatments could result in an increase in bird strikes compared to what was planned in the 2018 LRDP.

Muir/Revelle College Neighborhoods: Redevelopment for the West Campus Academic Site 2 (WC7) and the Triton Recreation Center (WC8) could introduce new lighting sources; however, this area already includes athletic field lighting from Muir Field and other academic buildings and is unlikely to result in a substantial increase in light and glare compared to what was planned in the 2018 LRDP.

University Center Neighborhood: Redevelopment of the University Center area with academic uses is proposed (WC9), with an increased intensity compared to the 2018 LRDP. However, this area is already developed with buildings that include exterior and interior lighting, and redevelopment is unlikely to result in a substantial increase in light and glare compared to what was planned in the 2018 LRDP.

Health Sciences West District: Redevelopment with academic/research uses as part of the Health Sciences Academic 2, 3, and 4 projects (WC16, WC17, and WC18) is proposed along Gilman Drive and Villa La Jolla Drive, and this area is where the potential wastewater treatment plant would be located if needed (WC19) as part of the Update to the 2018 LRDP. This area of the campus is almost fully developed with existing buildings that include exterior and interior lighting and the Update to the 2018 LRDP is not likely to result in a substantial increase in light and glare compared to what was planned in the 2018 LRDP.

Warren College Neighborhood: Higher density student housing redevelopment is proposed to be developed on the existing Warren College Housing site, east of Franklin Antonio Hall, adjacent to the North Canyon, along Voigt Drive and Justice Lane as part of the West Campus Housing 2 project (WC10). Due to the proximity to the Ecological Reserve within North Canyon and the visibility of potential development to drivers along I-5, an increase in potential lighting and glare impacts could occur, as well as an increased potential for bird strikes, depending on the proposed height of the structures compared to existing buildings, compared to what was planned in the 2018 LRDP.

Pepper Canyon District: Higher density housing/mixed-use is proposed along Pepper Canyon Drive to replace the existing housing as part of the Pepper Canyon East Housing and Hotel projects (WC13 and WC14). Proposed development also includes community services (hotel and retail), recreation/open space, and below grade parking. In addition, expansion of the Canyonview Recreation Center is proposed (WC12) as part of the Update to the 2018 LRDP. Depending on the design and height of the student housing, new lighting and glare impacts may affect drivers along I-5 and increase the potential for bird strikes compared to what was planned in the 2018 LRDP.

Campus Services Complex: The parking lot north of Voigt Drive is proposed to be redeveloped with general service land uses as part of the Campus Services South project (WC11). Depending on the design of the development, lighting and glare impacts could be more intensive than the existing parking lot, resulting in potentially significant impacts to the adjacent Ecological Reserve within North Canyon, and drivers along I-5 compared to what was planned in the 2018 LRDP.

East Campus: Areas within East Campus are proposed to be redeveloped with clinical/research, community, and academic/research uses. Specifically, increased density for a proposed outpatient pavilion medical office building may be developed where a surface parking lot currently exists along Campus Point Drive (EC2) and a multi-story inpatient bed tower to be located west of Jacobs Medical Center (EC1), that would be visible from Interstate 5 freeway. These new structures, in

addition to other proposed development associated with the East Campus Clinical/Research 1-4 projects (EC3, EC4, EC5, and EC6) and the Preuss Expansion project (EC7), may result in more intense lighting and glare sources than compared to what was planned in the 2018 LRDP, and an increase in the potential for bird strikes.

Mesa Housing: The Update includes redevelopment of South Mesa Housing (EC9 and EC10) with more dense student housing, similar to the redevelopment of the student housing within the Mesa Nueva, Nuevo West, and Nuevo East areas. As this area is almost fully developed with high rise structures that include exterior and interior lighting, it is unlikely that redevelopment would result in a substantial increase in lighting and glare impacts; however, an increase in bird strikes may occur compared to what was planned in the 2018 LRDP.

Summary

New development under the Update to the 2018 LRDP would take place in areas that are largely built out; however, some areas that are currently developed with surface parking or lower density/ height buildings could be redeveloped with taller structures and high-rise towers with an increased density compared to the 2018 LRDP. Potential new sources of light would include exterior building illumination, parking lots or structures, and lighting for specialized functions such as recreation/ athletic fields. During the day, lighting has limited potential to impact views. However, new sources of glare could result from reflective building surfaces or the headlights of vehicular traffic. Increased light and glare are particularly anticipated for high-density development. As noted in Section 3.3 of this SEIR, potential impacts may result if reflections from glazing or other surface treatments increase the potential for bird strikes on buildings.

As part of the design review process, lighting for development projects under the Update to the 2018 LRDP would be required to comply with the UC San Diego Outdoor Lighting Policy and the UC San Diego Outdoor Lighting Design Guidelines. Projects developed within the jurisdiction of the CCC would also need to comply with lighting standards as part of the CDP process. Further, as part of mitigation measure Bio-3J, permanent lighting within or adjacent to the Ecological Reserve would be required to be shielded and/or screened by vegetation. Compliance with these policies would require fixtures and design that would minimize light pollution or spillover such as through directing light downward and shielding. As a result, spillover onto adjacent residential land uses and the UC San Diego Open Space Preserve areas would be limited by focusing additional light only on the area to be illuminated; and impacts would be less than significant.

However, implementation of the Update to the 2018 LRDP could include the construction of new parking structures and/or lots that have the potential to create a new source of substantial glare from vehicle headlights that could adversely affect nighttime views in the area. Because specific project design details are currently unknown, mitigation is provided to ensure that no significant glare impacts occur with implementation of the Update to the 2018 LRDP.

As noted in Section 3.3, the 2018 LRDP EIR did not discuss bird mortality due to bird collisions. Development that includes reflective surfaces within the campus has the potential to increase bird strikes on buildings, resulting in a potentially significant impact to avian species.

Level of Significance Before Mitigation

As described above, impacts associated with glare from the construction of new parking areas and structures would be potentially significant, consistent with the conclusion in the 2018 LRDP EIR. In

addition, the increase in bird strikes resulting from reflective surfaces would be potentially significant. Therefore, the following mitigation measures will be implemented.

Mitigation Measures

Applicable measure from the 2018 LRDP EIR:

Aes-3 **Glare Reduction Measures**. Projects that include development or alteration of a parking area, parking structure, or road that could result in the prolonged or excessive repetitive exposure of residential areas or other light sensitive uses, or glare from vehicle headlights, shall be designed to shield direct glare from such uses. If shielding cannot be implemented through design modifications during the conceptual design phase, then walls, landscaping, or other glare barriers shall be provided as appropriate to shield direct glare into the nearby light sensitive uses.

In addition, projects adjacent to the Ecological Reserve would be required to implement mitigation measure Bio-3J (see Section 3.3, *Biological Resources*, of this SEIR).

New mitigation measure for the Update to the 2018 LRDP:

A new measure, Bio-2H, is proposed in Section 3.3.3.2 of this SEIR to reduce reflective surfaces and encourage bird-safe building standards.

Level of Significance After Mitigation

Implementation of mitigation measures Aes-3 and Bio-2H would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

3.1.4 CUMULATIVE IMPACTS AND MITIGATION

Aesthetics Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative aesthetic impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Degradation of scenic vista(s).	Significant.	Not cumulatively considerable with Aes-1.	Significant.	Not cumulatively considerable with Aes-1.
Conflict with applicable regulations governing scenic quality.	Significant.	Not cumulatively considerable with Aes-2A and Aes-2B.	Less than significant.	Not cumulatively considerable.
New source of substantial light or glare on campus.	Significant.	Not cumulatively considerable with Aes-3.	Significant.	Not cumulatively considerable with Aes-3. Bio-2H, and Bio-3J.

The study area for the analysis of cumulative impact on aesthetic is UC San Diego and the surrounding communities. Aesthetic impacts on the surrounding communities are currently regulated by the City of San Diego General Plan and Community Plans (University Community Plan and La Jolla Community Plan and Local Coastal Program Land Use Plan). All off-campus projects must comply with these regulatory documents which include protection of publicly accessible view corridors and designated scenic vistas, visual character and light and glare.

Degradation of Scenic Vista(s)

Section 3.1.4 of the 2018 LRDP EIR concluded that the presence of scenic views and sensitive visual resources along the western and southern portions of the campus and in its vicinity may be affected by future development and therefore the cumulative impact would be potentially significant.

Both the University and the City of San Diego have policies in place to protect publicly accessible view corridors and designated scenic vistas. Existing UC San Diego policy requires that projects with the potential to adversely affect a scenic vista or sensitive views be reviewed by the DRB and other committees to identify specific design features that could be used to preserve or enhance views. To mitigate potentially significant impacts to a scenic vista or sensitive view, mitigation measure Aes-1 provides a general framework for addressing impacts associated with potential future development projects relating to implementation of the Update to the 2018 LRDP.

Therefore, campus projects would be required to demonstrate that views would not adversely affect scenic vistas or sensitive views. Continued compliance with the CCC requirements would further ensure blockage to a scenic vista or sensitive views would not occur in the cumulative study area in the future. Implementation of the Update to the 2018 LRDP would further reinforce these efforts by requiring review of project-specific design features as part of their compliance with mitigation identified in this SEIR (i.e., mitigation measure Aes-1). Therefore, the proposed Update to the 2018 LRDP would not contribute considerably to cumulative impacts to scenic views or vistas, consistent with the conclusion in the 2018 LRDP EIR.

Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality

Off-campus projects would be required to comply with City of San Diego zoning and other regulations governing scenic quality as part of the discretionary permit and building permit review process. On-campus projects would be required to comply with UC San Diego and California Coastal Act policies. The cumulative impact would be considered less than significant. This is a reduced impact compared to the conclusion in the 2018 LRDP EIR.

New Source of Substantial Light or Glare on Campus

Section 3.1.4 of the 2018 LRDP EIR concluded that the cumulative impacts related to light and glare would be potentially significant; however, the 2018 LRDP would not contribute to cumulative impacts associated with light and glare with the implementation of mitigation measure Aes-3. As described in Section 3.1.3.3 above, projects on campus would be required to comply with the UC San Diego Design Guidelines, Outdoor Lighting Policy and Outdoor Lighting Design Guidelines. Compliance with these policies would minimize light pollution or spillover and would not be cumulatively considerable. However, implementation of the Update to the 2018 LRDP could include the construction of new parking structures that have the potential to create a new source of substantial glare from vehicle headlights that could cumulatively contribute to adversely affect nighttime views in the area. Further, development that includes reflective surfaces has the potential to increase bird strikes on buildings, resulting in adverse impacts to avian species. However, implementation of mitigation measure Aes-3 would reduce nighttime glare from vehicle headlights at new parking structures, mitigation measure Bio-3J would ensure that permanent lighting for projects within or adjacent to the Ecological Reserve would be required to be shielded and/or screened by vegetation, and the new measure Bio-2H would require bird-safe building practices that would reduce impacts to a level that is less than cumulatively considerable, consistent with the conclusion in the 2018 LRDP EIR.

3.1.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

The following section discusses the other Standards of Significance related to Aesthetics contained in Appendix G of the CEQA Guidelines wherein the proposed Update to the 2018 LRDP was determined to not cause a significant effect.

Would the Update to the 2018 LRDP substantially damage scenic resources, including but not limited to, trees, rocks, outcroppings, and historic buildings within a state scenic highway?

As discussed in the 2018 LRDP EIR, a "state scenic highway" refers to any interstate, state, or county road that has been officially designated as scenic and thereby requires special scenic conservation treatment. I-5 bisects the campus and is considered an Eligible State Scenic Highway – Not Designated. There are no unique trees or trees of significant nature, or unique rock outcroppings on the UC San Diego campus within the viewshed of the I-5. The implementation of the 2018 LRDP was determined not to result in substantial damage to scenic resources within a state scenic highway and it was concluded that no impact would occur and no mitigation would be required.

There have been no substantial changes with regard to scenic resources, including but not limited to trees, rocks, outcroppings, and historic buildings within a state scenic highway since the 2018 LRDP EIR was certified. The designation of I-5 has not changed (California Department of Transportation 2024). The Update to the 2018 LRDP does not include any changes to the Geisel Library. Therefore, no changes in circumstances and no new information of substantial importance relative to this topic have been identified.

Based on the above, no new significant impacts or a substantial increase in previously identified impacts would occur within a state scenic highway as a result of the Update to the 2018 LRDP. Mitigation measures would not be required, consistent with the conclusions in the 2018 LRDP EIR.

3.1.6 REFERENCES

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2009. UC San Diego Policy & Procedure Manual, Outdoor Lighting Policy. December. U.S. Census Bureau. 2022. Urban Area Criteria for the 2020 Census-Final Criteria. March. Available at: https://www.federalregister.gov/documents/2022/03/24/2022-06180/urban-area-criteria-for-the-2020-census-final-criteria Criteria.

3.2 AIR QUALITY

This section describes the existing air quality conditions of the UC San Diego campus and surrounding area and addresses pollutant emissions that would result from implementation of the proposed Update to the 2018 LRDP. The evaluation of potential air quality impacts considers whether the proposed Update to the 2018 LRDP would result in new or substantially more severe environmental impacts related to air quality than those identified in Section 3.2 of the 2018 LRDP EIR. This section is based on the Subsequent Air Quality Technical Report prepared for the Update to the 2018 LRDP (HELIX 2025), which is provided as Appendix B1 to the SEIR. The Air Quality Technical Report and Health Risk Assessment prepared by AECOM for the 2018 LRDP EIR are incorporated by reference (AECOM 2018). Analysis in this section related to vehicle trips is based on trip generation calculation memorandum prepared by Linscott, Law & Greenspan Engineers (LLG; 2025), which is included as Appendix B2 of this SEIR.

3.2.1 ENVIRONMENTAL SETTING

Section 3.2.1 of the 2018 LRDP EIR provides a description of the existing setting of campus within the San Diego Air Basin (SDAB) and provides an overview of air quality issues covered under CEQA, including criteria pollutants, toxic air contaminants, and odors. The description of the setting and air quality background remains accurate for this SEIR. Updates to air quality standards and current ambient air quality monitoring data for the SDAB are provided below.

3.2.1.1 AIR QUALITY STANDARDS

Table 3.2-1 of the 2018 LRDP EIR presents the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). On February 7, 2024, the U.S. Environmental Protection Agency (USEPA) announced a final rule lowering the annual arithmetic mean (AAM) primary NAAQS for particulate matter 2.5 microns or less in diameter ($PM_{2.5}$) from 12 micrograms per cubic meter ($\mu g/m^3$) to 9 $\mu g/m^3$. The new final rule retains the existing 24-hour primary NAAQS for $PM_{2.5}$ at 35 $\mu g/m^3$ and the existing AAM secondary NAAQS for $PM_{2.5}$ at 15.0 $\mu g/m^3$ (USEPA 2024). No changes to $PM_{2.5}$ attainment statuses have been made based on the revised NAAQS for $PM_{2.5}$.

It remains the case, as described in the 2018 LRDP EIR, that the SDAB is a state nonattainment region for ozone (O_3), $PM_{2.5}$, and particulate matter less than 10 microns in diameter (PM_{10}), and a federal nonattainment region for O_3.

3.2.1.2 MONITORED AIR QUALITY

Existing air quality monitoring information in the 2018 LRDP EIR was provided for the years 2014 through 2016 at the Del Mar and Kearny Mesa monitoring stations. Updated monitoring data for 2020 through 2022 is provided in Table 3.2-1, *Air Quality Monitoring Data*. The closest SDAPCD monitoring station to the campus is located at 6125A Kearny Villa Road, San Diego, California, approximately six miles southeast of UC San Diego. This station monitors O_3, $PM_{2.5}$, and nitrogen dioxide (NO_2). Air quality data for carbon monoxide (CO) and PM_{10} was obtained from the SDAPCD Annual Air Quality Monitoring Network Plan (SDAPCD 2024a) and represent concentrations in San Diego County.

As shown in Table 3.2-1, the 1- and 8-hour ozone, PM_{10}, and $PM_{2.5}$ standards show more exceedances during the sample period than were identified in the 2014-2016 monitoring data provided in the 2018 LRDP EIR. No exceedances of PM_{10} or $PM_{2.5}$ had been shown for 2014-2016 and fewer days with ozone exceedances had occurred. Data for CO and NO_2 showed no exceedances for the 2020-2022 sample period, consistent with the 2014-2016 monitoring data provided in the 2018 LRDP EIR.

Table 3.2-1
Air Quality Monitoring Data

Pollutant	2020	2021	2022
Ozone (O_3)			
Maximum 1-hour concentration (ppm)	0.123	0.095	0.095
Days above 1-hour state standard (>0.09 ppm)	2	1	1
Maximum 8-hour concentration (ppm)	0.102	0.072	0.083
Days above 8-hour state standard (>0.070 ppm)	12	2	2
Carbon Monoxide (CO)			
Maximum 8-hour concentration (ppm)	1.7	1.8	1.2
Days above federal standard (>9.0 ppm)	0	0	0
Respirable Particulate Matter (PM_{10})			
Maximum 24-hour concentration (µg/m^3)	174	122	243
Days above federal standard (>150 µg/m^3)	2	0	3
Fine Particulate Matter ($PM_{2.5}$)			
Maximum 24-hour concentration (µg/m^3)	47.5	20.9	13.9
Days above federal standard (>35 µg/m^3)	2	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour concentration (ppm)	0.052	0.060	0.051
Days above state 1-hour standard (0.18 ppm)	0	0	0

Sources: CARB 2024; SDAPCD 2024a
ppm = parts per million, µg/m3 = micrograms per cubic meter

3.2.2 REGULATORY FRAMEWORK

The regulatory framework addressing air quality is provided in Section 3.2.2 of the 2018 LRDP EIR and remains applicable to the Update to the 2018 LRDP. In addition, the following regulations have been updated from those described in the 2018 LRDP EIR.

3.2.2.1 REGIONAL

San Diego Air Pollution Control District

As described in the 2018 LRDP EIR, SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for the attainment and maintenance of the ambient air quality standards in the SDAB. The current regional air quality plan for San Diego County for attainment of the NAAQS is SDAPCD's *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County* (Attainment Plan; SDAPCD 2020). The Attainment Plan outlines SDAPCD's strategies and control measures designed to attain the NAAQS for ozone.

For attainment of the CAAQS, the SDAPCD must prepare an updated State Ozone Attainment Plan to identify possible new actions to further reduce emissions. The most recent update to the Regional Air Quality Strategy (RAQS), initially adopted in 1992, occurred in 2023 (SDAPCD 2024b). The RAQS identifies measures to reduce emissions from sources regulated by the SDAPCD, primarily

stationary sources such as industrial operations and manufacturing facilities. The RAQS is periodically updated to reflect updated information on air quality, emission trends, and new feasible control measures (SDAPCD 2024b).

The Attainment Plan and RAQS address emissions from all sources, including natural ones, through the implementation of control measures, where feasible, on stationary sources to attain the standards. Emissions from mobile sources, which are regulated by the USEPA and the California Air Resources Board (CARB), are also considered in the Attainment Plan and RAQS, along with strategies for their reduction. The Attainment Plan and RAQS, in combination with local plans from all other California nonattainment areas with serious (or worse) air quality problems, are submitted to the CARB, which develops the California State Implementation Plan (SIP).

3.2.3 PROJECT IMPACTS AND MITIGATION

3.2.3.1 ISSUE 1 — CONSISTENCY WITH APPLICABLE AIR QUALITY PLAN

Air Quality Issue 1 Summary

Would implementation of the Update to the 2018 LRDP result in a conflict with or obstruct implementation of the applicable air quality plan?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

The analysis of potential conflicts with air quality plans for the 2018 LRDP is provided in Section 3.2.3.1 of the 2018 LRDP EIR. It was determined that implementation of the 2018 LRDP would be consistent with the Smart Growth vision for the region in the SANDAG Regional Plan and would result in less vehicle miles traveled (VMT) than the regional average, resulting in the proposed 2018 LRDP not conflicting with or obstructing implementation of the applicable air quality plan. Therefore, the 2018 LRDP EIR concluded impacts would be less than significant.

Proposed Changes that Require Major Revisions to the 2018 LRDP EIR

As the Update to the 2018 LRDP proposes a revised land use plan and would accommodate additional population growth, consistency with the applicable air quality plans must be evaluated.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Updates to the Attainment Plan and RAQS have occurred since preparation of the 2018 LRDP EIR; however, these updates occur regularly and continue to address the same pollutant (ozone) since there have been no changes in the attainment status of the SDAB. There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP would be undertaken, and there is no new information of substantial importance that has become available relative to air quality plans.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in a conflict with or obstruct implementation of the applicable air quality plan. The applicable air quality plans for the San Diego County area include the Attainment Plan and RAQS, both developed and administered by SDAPCD with input from SANDAG. The local Attainment Plan and RAQS, in combination with those from other California non-attainment areas, is submitted to CARB for inclusion with the SIP.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

Air quality plans describe air pollution control strategies to be implemented by a city, county, or regional air district. The primary purpose of an air quality plan is to bring an area that does not attain federal and state air quality standards into compliance with those standards pursuant to the requirements of the Federal Clean Air Act and California Clean Air Act.

The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for ozone. In addition, the SDAPCD's Attainment Plan includes the SDAPCD's plans and control measures for attaining the ozone NAAQS. These plans address emissions from all sources, including natural ones, through the implementation of control measures, where feasible, on stationary sources to attain the standards. Emissions from mobile sources, which are regulated by the USEPA and the CARB, are also considered in the RAQS and SIP along with strategies for their reduction.

Projects that are consistent with the assumptions used in development of the applicable air quality plan are considered to not conflict with or obstruct the attainment of the air quality levels identified in the plan. Therefore, the following impact analysis considers if the Update to the 2018 LRDP is consistent with the assumptions that inform the Attainment Plan and RAQS.

Impact Analysis

The use of construction equipment in the RAQS is estimated for the region on an annual basis, and construction-related emissions are estimated as an aggregate in the RAQS. Therefore, the Update to the 2018 LRDP would not increase the assumptions for off-road equipment use in the RAQS.

Assumptions for land use development used in the RAQS and Attainment Plan are taken from local and regional planning documents. Emission forecasts rely on projections of VMT by the Metropolitan Planning Organizations, such as SANDAG, and population, employment, and land use projections made by local jurisdictions during development of the area and general plans.

The East and West Campus areas are located within one-half mile of high-frequency transit (15-minute headways or lower), which includes major transit stops, high-quality transit corridors, and shuttle stops. As a result, development within these areas reduces vehicle trips and VMT (refer to Section 3.10, Transportation and Circulation, for further discussion). The UC San Diego campus is also identified within a Transit Priority Project Area with several roadways (i.e., La Jolla Village Drive, Nobel Drive, Genesee Avenue, North Torrey Pines Road, Regents Road) classified as a high-quality Transit Corridor. While a portion of SIO is not within one-half mile of high-frequency transit, it is connected to the rest of campus by the UC San Diego shuttle system and there are no changes in land use or development intensity proposed under the Update to the 2018 LRDP within SIO.

The Update to the 2018 LRDP incorporates the following strategies to ensure that mobility is preserved within the community and across the region:

- Promote pedestrian and bicycle mobility
- Improve transit accessibility, ridership, and performance
- Promote TDM strategies
- Ensure improvements support planned local and regional projects

The Update to the 2018 LRDP land uses are generally consistent with the current campus land use types. Since the proposed Update to the 2018 LRDP incorporates strategies identified in the SANDAG Regional Plan by integrating land use, housing, and transportation planning, the Update to the 2018 LRDP is consistent with the goals developed by SANDAG. Because implementation of the Update to the 2018 LRDP would be consistent with the Smart Growth vision for the region identified in the SANDAG Regional Plan and would result in less VMT than the regional average, it would not conflict with or obstruct implementation of the applicable air quality plans.

Level of Significance Before Mitigation

The impact would be less than significant for the Update to the 2018 LRDP, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the impact identified in the 2018 LRDP EIR.

3.2.3.2 ISSUE 2 — CUMULATIVELY CONSIDERABLE NET INCREASE OF NONATTAINMENT CRITERIA POLLUTANTS

Air Quality Issue 2 Summary

Would implementation of the Update to the 2018 LRDP result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard?

2018 LRDP EIR Significance Conclusion	Significant and unavoidable (construction and operational).
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation (construction emissions); Less than significant with mitigation (operational).
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Minimize Off-Road Construction Equipment Emissions (AQ-2B); Electric Landscape Equipment (AQ-2C); Minimize Emergency Backup Generator Emissions (AQ-2D).

Summary of Analysis in the 2018 LRDP EIR

This issue was addressed in Sections 3.2.3.2 and 3.2.3.3 of the 2018 LRDP EIR. Within Section 3.2.3.2 related to air quality standards, the 2018 LRDP EIR analysis concluded that construction activities would potentially exceed thresholds for nitrogen oxides (NO_X), PM_{10}, and $PM_{2.5}$; operational activities would potentially exceed the threshold for PM_{10}; and overlapping construction and operational activities would potentially exceed the thresholds for PM_{10} and $PM_{2.5}$, resulting in potentially significant impacts.

Implementation of mitigation measures AQ-2A (measures to decrease PM emissions during construction) and AQ-2B (use of Tier 4 construction equipment to reduce emissions) would reduce construction period impacts to less than significant levels if fully implemented, however, full compliance with AQ-2B could not be assured. Therefore, construction-related NO_X emissions were concluded to result in significant and unavoidable impacts.

There were no feasible mitigation measures available to address operational PM_{10} mobile-source emissions. Therefore, emissions of PM_{10} during operation were concluded to result in significant and unavoidable impacts.

Within Section 3.2.3.3 related to cumulative increases in criteria pollutants, the 2018 LRDP EIR analysis concluded that because implementation of the 2018 LRDP would exceed the project-level air quality significance thresholds for PM_{10} and NO_X emissions, construction and operational emissions associated with the 2018 LRDP would be cumulatively considerable. Therefore, impacts related to a cumulatively considerable net increase of criteria pollutants were concluded to be significant and unavoidable.

Proposed Changes that Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes increases in campus population and development space that would generate increased construction and operational emissions.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP would be undertaken, and there is no new information of substantial importance that has become available related to criteria pollutants.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable NAAQS or CAAQS (including releasing emissions that exceed quantitative thresholds for ozone precursors).

The SDAB is designated as a nonattainment area for the NAAQS for ozone and the CAAQS for ozone, PM_{10}, and $PM_{2.5}$. By its very nature, air pollution is largely a cumulative impact. Past, present, and future development projects contribute to the region's air quality attainment status on a cumulative basis. No single project is sufficient in size to, by itself, result in regional nonattainment of ambient air quality standards.

As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management board or air pollution control district may be relied on to make the impact determinations for specific program elements. SDAPCD has not developed quantitative significance standards for projects under CEQA. However, the SDAPCD does provide Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources in Regulation II, Rule 20.2, Table 20-2-1, "AQIA Trigger Levels" (SDAPCD 2019). The City of San Diego has adopted the SDAPCD AQIA trigger levels as recommended screening level standards of significance for regional pollutant emissions (City of San Diego 2022). Therefore, the SDAPCD AQIA trigger levels and City of San Diego screening standards of significance for regional pollutant emissions were used to analyze the impacts of the proposed Update to the 2018 LRDP, consistent with the methodology of the 2018 LRDP EIR. Only the $PM_{2.5}$ daily threshold has changed from the threshold considered in the 2018 LRDP EIR. The screening level standards are shown in Table 3.2-2, *Regional Pollutant Emission Screening Level Standards of Significance*.

Table 3.2-2
Regional Pollutant Emission Screening Level Standards of Significance

	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Pounds per hour	-	25	100	25	-	-
Pounds per day	137	250	550	250	100	67
Tons per year	15	40	100	40	15	10

Source: City of San Diego 2022; SDAPCD 2019
VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} =particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter.

If the emissions generated as a result of implementation of the Update to the 2018 LRDP are found to be below the screening level standards, it can be concluded that the Update to the 2018 LRDP would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

Development resulting from the Update to the 2018 LRDP would result in emissions during both construction and operations. Two scenarios are analyzed for construction: projects that could be built by 2030 (2030 Scenario) and projects that could be built between 2030 and 2040 (2040 Scenario). Emissions were calculated for each scenario using development projections provided by UC San Diego. Operational emissions were estimated for the updated horizon year of 2040.

Construction associated with implementation of the Update to the 2018 LRDP would generate pollutant emissions from construction equipment use, vehicle trips, demolition debris, and earth handling activities. Operational emissions may be both direct and indirect, and would be generated by area, mobile, and stationary sources. Emissions calculations based on the appropriate models and emission factors for these sources are discussed further below.

Construction

Sources of construction-related emissions include construction equipment exhaust; construction-related trips by workers, delivery trucks, and material-hauling trucks; and dust generated by demolition debris and earth handling activities. The quantity of emissions generated by the construction of projects in any given year under the Update to the 2018 LRDP would vary depending upon the number of projects occurring and the size of each individual project. Since the proposed Update to the 2018 LRDP is a land use plan that guides physical development of the campus through 2040, specific construction details, such as the exact number and timing of all development projects are uncertain. The intensity of construction activity associated with the proposed Update to the 2018 LRDP could be the same during each year. It is more likely, however, that some periods of construction (and associated emissions) would be more intense than other periods based on fluctuations in campus growth and development priorities.

While neither SDAPCD nor the City of San Diego provides additional guidance on construction assumptions for plan-level analyses, some air districts such as the Sacramento Metropolitan Air Quality Management District (SMAQMD) suggest that lead agencies conservatively assume that construction-generated emissions associated with the build-out of a plan should be evaluated assuming 25 percent of the total land uses would be constructed in a single year (SMAQMD 2020).

This conservative assumption was used to evaluate the potential construction-related air quality impacts from projects that could occur under the Update to the 2018 LRDP.

This analysis assumes two construction scenarios for projects implemented under the Update to the 2018 LRDP: projects that could be developed through 2030 (2030 Scenario) and projects that could be developed between 2030 and 2040 (2040 Scenario). To illustrate the range of potential construction-related air quality impacts from projects that could occur using SMAQMD guidance, this analysis evaluates the two following conservative construction scenarios:

1. 2030 Scenario: 25 percent of the land uses constructed by 2030 assumed to be constructed in 2025. After 2025, the remaining 75 percent is assumed to be constructed at a constant rate of 18.75 percent per year from 2026 through 2029.

2. 2040 Scenario: 25 percent of the land uses constructed by 2040 assumed to be constructed in 2030. After 2030, the remaining 75 percent is assumed to be constructed at a constant rate of 7.5 percent per year from 2031 through 2040.

Construction period emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod is a computer model used to estimate air emissions resulting from land development projects throughout the state of California. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air quality management and pollution control districts (CAPCOA 2022). CalEEMod includes default estimates on the required construction equipment, phases, and activities when project-specific information is unavailable. The default estimates are based on surveys of typical construction projects, which provide a basis for scaling equipment needs and schedule with a project size. Emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. The modeling also assumes fugitive dust control in accordance with the SDAPCD Rule 55 and associated best management practices (BMPs), specifically watering exposed areas twice per day, enforcing a 15-mph speed limit on unpaved surfaces, and maintaining a minimum moisture content of 12 percent for unpaved roads.

Operation

Following construction, day-to-day activities associated with operation of the Update to the 2018 LRDP would generate emissions from a variety of sources. Operational emissions may be both direct and indirect, and would be generated by area, mobile, and stationary sources. Operational emissions were estimated for the updated horizon year of 2040 for comparison with the emissions estimated in the 2018 LRDP EIR for the baseline condition (buildout of the previously adopted LRDP) and the 2018 LRDP horizon year of 2035.

Area Sources

Area source emissions are those associated with the use of consumer products, landscaping and maintenance equipment, and fireplaces/fire pits. CalEEMod estimates consumer products usage based on a statewide inventory of volatile organic compounds (VOC) emissions and statewide building area. To obtain an applicable consumer production emission factor for the San Diego area, the CalEEMod default emission factor for general consumer products was adjusted to reflect San Diego County-specific emissions. The San Diego County-specific consumer product emission factor was estimated to be 0.0000165 pounds per square-foot per day (AECOM 2018). Landscaping

emissions are based on land use and building square footage along with emission rates provided in CARB's Small Off-Road Engines Model v1.1 (CAPCOA 2022). The modeling analysis for the area sources used model default emissions factors, as well as specific campus project features associated with new developments. For example, since the land uses involve on-campus apartments and residence halls, the proposed Update to the 2018 LRDP is not anticipated to include any natural gas or wood fireplaces.

Mobile Sources

Trip generation associated with the Update to the 2018 LRDP SEIR was estimated using an updated approach compared to the 2018 LRDP EIR. The methodology for the Update to the 2018 LRDP SEIR now relies on the estimated campus population projections, combined with detailed, self-reported, Winter 2023 mode split data. Previous methodology was based on more generalized trip generation standards, including those from the City of San Diego, that may not have as accurately accounted for the more nuanced transportation patterns of a university campus. For additional details, please refer to the Trip Generation Calculation Memorandum prepared by LLG (LLG 2025; also attached as Appendix B2 to this SEIR).

Using this updated methodology, the average daily vehicle trips (ADT) for buildout of the Update to the 2018 LRDP were estimated to be approximately 73,915 trips in 2040 (LLG 2025). The weekday VMT for buildout of the Update to the 2018 LRDP were estimated to be approximately 657,476 miles in 2040 (LLG 2025). Mobile source emissions for trips and miles traveled were estimated using CalEEMod.

Energy Sources

UC San Diego's energy use includes electricity generated on campus at the campus cogeneration plant, electricity purchased from San Diego Gas and Electric (SDG&E), and natural gas purchased from SDG&E. An important element of the campus's energy use and energy-related infrastructure is its centralized cooling and heating systems and cogeneration operations for on-site electric power production, which contribute to a reduction in the campus's overall usage of energy.

Electricity generated by utility providers typically entails the combustion of fossil fuels, including natural gas and coal, which is then transmitted to end users. A building's electricity use is thus associated with off-site or indirect emissions at the source of electricity generation, and these emissions are not included in the analysis of a land use development project's local or regional air quality impacts.

Natural gas consumption for the campus was based on the estimates provided in the *Decarbonization Study Prepared for the University of California, San Diego* (Decarbonization Study; Salas O'Brien 2024). Consistent with the Green Building Design requirements of the UC Sustainable Practices Policy, the new facilities would be electric-only. As a Direct Access customer, UC San Diego obtains its purchased electricity via the UC Energy Services Unit which is 100 percent carbon neutral.

Stationary Sources

Stationary sources include equipment that burns fossil fuel, typically either natural gas or diesel fuel, to generate either heat or electricity. Stationary sources on campus that burn natural gas include the Biomedical Sciences Building (BSB) crematory, the Moores Cancer Center thermal fluid

heaters, central utilities cogeneration turbines and boilers, and other boilers located throughout campus. Emissions associated with stationary sources burning natural gas are estimated following the methods described for energy sources, using campuswide natural gas consumption rates included in the Decarbonization Study (Salas O'Brien 2024). Stationary sources that burn diesel fuel include emergency generators.

Activity data, such as fuel consumption rates and operating time, were used to estimate emissions from diesel emergency generators. Consistent with the analysis presented in the 2018 LRDP EIR, emission factors achieving USEPA Tier 4 requirements were used in the analysis.

VOC emissions from research laboratories were estimated based on a review of available UC San Diego chemical data and wet laboratory inventory information, as well as the previous health risk assessment for the 2018 LRDP. VOC emissions associated with hazardous waste bulking operations were estimated based on chemical volumes and volatilization loss factors. Detailed emission calculation methodologies for research laboratories and hazardous waste bulking operations are provided in Appendix A of the Subsequent Air Quality Technical Report, appended to the SEIR as Appendix B1.

Impact Analysis

The Update to the 2018 LRDP would generate criteria pollutants during construction and operation. To determine whether a project would result in a cumulatively considerable net increase in criteria pollutant emissions that would violate an air quality standard or contribute substantially to an existing or projected air quality violation, emissions are evaluated based on the quantitative emission thresholds shown in Table 3.2-2. The Update to the 2018 LRDP's emissions were estimated using the methods and assumptions described above for comparison with these thresholds.

Construction Emissions

Construction emissions are described as "short-term" or temporary in duration; however, they have the potential to represent a significant impact with respect to air quality. Construction under the Update to the 2018 LRDP would result in the temporary generation of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions. VOC, NO_X, CO, and SO_X emissions are primarily associated with mobile equipment exhaust, including off-road construction equipment and on-road motor vehicles. Fugitive PM dust emissions are primarily associated with site preparation and vary as a function of parameters such as soil silt content, soil moisture, wind speed, acreage of disturbance area, and VMT by construction vehicles on and off campus.

Construction emissions were estimated separately for West Campus, East Campus, and SIO. However, since construction activities could occur at all three areas of campus at the same time, emissions from each area were combined to estimate maximum daily construction emissions for the campus as a whole and then compared to the standards of significance. Table 3.2-3, *Update to the 2018 LRDP Unmitigated Maximum Daily Construction Emissions*, presents total construction emissions associated with implementation of the Update to the 2018 LRDP for the 2030 and 2040 Scenarios.

Table 3.2-3
Update to the 2018 LRDP Unmitigated Maximum Daily Construction Emissions

	Pollutant Emissions (pounds/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2030 Scenario						
West Campus	21.99	108.10	136.01	0.20	22.21	10.94
East Campus	30.63	110.55	154.73	0.20	25.63	11.77
SIO	6.72	54.91	62.11	0.10	8.05	4.77
2030 Scenario Total	*59.34*	*273.56*	*352.84*	*0.50*	*55.89*	*27.48*
2040 Scenario						
West Campus	16.78	95.23	179.16	0.24	36.06	13.44
East Campus	26.14	86.63	130.52	0.21	22.97	10.33
SIO	13.32	73.22	98.58	0.15	15.88	8.48
2040 Scenario Total	*56.24*	*255.08*	*408.26*	*0.60*	*74.91*	*32.26*
Maximum Daily Construction Emissions	**59.34**	**273.56**	**408.26**	**0.60**	**74.91**	**32.26**
Thresholds	137	250	550	250	100	67
Significant Impact?	No	**Yes**	No	No	No	No

Source: HELIX 2025
Note: Totals may not sum due to rounding. Values are rounded to the nearest hundredth.
VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; SIO = Scripps Institution of Oceanography

As shown in Table 3.2-3, construction-generated emissions of NO_X would exceed maximum daily standards established by the City of San Diego. It is also worth noting, Table 3.2-3 shows a less than significant impact related to PM_{10} and $PM_{2.5}$ emissions where the 2018 LRDP EIR had a potentially significant finding. This reduction is the result of the implementation of BMPs required by SDAPCD regulations to reduce fugitive dust. Nonetheless, construction emissions could result in a cumulatively considerable net increase of a criteria pollutant for which the region is non-attainment (ozone) under an applicable federal or state ambient air quality standard.

Operational Emissions

Day-to-day activities associated with the operation of development associated with the Update to the 2018 LRDP would generate emissions from area, mobile, and stationary sources, as described above. Pursuant to the CEQA Guidelines (Section 15162[a]), this analysis evaluates the net change in operational emissions from buildout of the 2018 LRDP in 2035, as identified in the 2018 LRDP EIR air quality analysis (AECOM 2018), to the buildout of the Update to the 2018 LRDP in 2040. This approach is consistent with the requirements of subsequent analysis pursuant to CEQA. Therefore, the emissions associated with the land uses identified in the 2018 LRDP EIR were subtracted from the emissions under the Update to the 2018 LRDP to calculate the net change in emissions associated with implementation of the Update to the 2018 LRDP. The net increase in emissions is compared to the applicable threshold of significance to determine whether the Update to the 2018 LRDP would result in a substantial increase when compared to the 2018 LRDP. In addition, consistent with the approach of the 2018 LRDP EIR, the emissions associated with adjusted existing conditions (identified in the 2018 LRDP EIR) were subtracted from the emissions of buildout of the Update to the 2018 LRDP to calculate the net change in emissions and determine whether the Update to the 2018 LRDP would result in a significant impact related to pollutant emissions. The estimated net daily unmitigated operational emissions associated with

implementation of the Update to the 2018 LRDP are shown in Table 3.2-4, *Update to the 2018 LRDP Unmitigated Operational Emissions at Buildout (2040)*.

Table 3.2-4
Update to the 2018 LRDP Unmitigated Operational Emissions at Buildout (2040)

Emission Source	Pollutant Emissions (pounds/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	256.67	<0.01	896.25	0.04	0.63	0.47
Generators	2.52	16.19	39.88	0.01	0.45	0.43
Natural Gas	1.28	23.30	19.57	0.14	1.77	1.77
Mobile (Commuting)	204.73	129.10	1,572.90	4.48	476.67	122.76
Update to 2018 LRDP Operational Emissions at Buildout (2040)	***465.21***	***168.60***	***2,528.61***	***4.67***	***481.57***	***125.44***
2018 LRDP Operational Emissions at Buildout (2035) (2018 LRDP EIR Table 3.2-8)	265.17	746.24	1,890.11	30.46	849.59	293.35
Net Change Attributable to the Update to the 2018 LRDP	**200.04**	**(577.64)**	**638.50**	**(25.79)**	**(368.02)**	**(167.91)**
Thresholds	137	250	550	250	100	67
Substantial Increase?	**Yes**	No	**Yes**	No	No	No
Adjusted Existing Conditions from 2018 LRDP EIR (2018 LRDP EIR Table 3.2-8)	330.80	1,378.14	3,817.39	32.39	713.79	246.10
Net Change between Update to 2018 LRDP (2040) and Adjusted Existing Conditions from the 2018 LRDP EIR	**134.41**	**(1,209.54)**	**(1,288.78)**	**(27.72)**	**(232.22)**	**(120.66)**
Significant Impact?	No	No	No	No	No	No

Source: HELIX 2025
Note: Totals may not sum due to rounding. Values are rounded to the nearest hundredth.
VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Implementation of the Update to the 2018 LRDP would lead to long-term operational emissions of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. However, even considering the operation of the additional development proposed, implementation of the Update to the 2018 LRDP would result in a net decrease of NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ compared to existing conditions described in the 2018 LRDP EIR and a net decrease of NO_X, SO_X, PM_{10}, and $PM_{2.5}$ compared to buildout of the 2018 LRDP. The net decrease is due to federal and state regulations related to advancements in engine technology and fleet turnover that would reduce mobile (vehicle) emissions over time as well as the revised methodology for estimating ADT and VMT described in the mobile source assumptions above.

As shown in Table 3.2-4, the net increase in total operational emissions associated with the Update to the 2018 LRDP from buildout of the 2018 LRDP would exceed the significance thresholds for VOC and CO. This net increase in emissions is primarily related to area sources which are directly related to size of development and population (CAPCOA 2022).

However, as shown in Table 3.2-4, the net change in operational emissions associated with the Update to the 2018 LRDP from existing conditions disclosed in the 2018 LRDP EIR would not exceed significance thresholds. Therefore, the substantial increases in operational emissions of

PM_{10} and $PM_{2.5}$ identified in the 2018 LRDP EIR would not occur under the Update to the 2018 LRDP.

Nonetheless, as operation of the Update to the 2018 LRDP would result in a net increase in operational emissions exceeding the applicable significance thresholds for VOC and CO when compared to emissions from the 2018 LRDP, operations could result in a substantial increase of criteria pollutants for which the region is non-attainment under applicable federal and state ambient air quality standards.

Level of Significance Before Mitigation

Construction-generated emissions of NO_X would exceed maximum daily standards and construction would result in a potentially significant impact. Operation of the Update to the 2018 LRDP would generate a net increase of emissions of VOC and CO exceeding maximum daily standards, and the impact would be potentially significant, representing a potentially substantial increase in the severity of a previously identified impact. The net change in operational emissions associated with the Update to the 2018 LRDP from existing conditions disclosed in the 2018 LRDP EIR would not exceed significance thresholds. This would represent a reduction of the potentially significant impact related to PM_{10} emissions identified in the 2018 LRDP EIR.

Mitigation Measures

Measure removed from the 2018 LRDP EIR:

Mitigation measure AQ-2A from the 2018 LRDP required implementation of measures to decrease PM emissions during construction activities. This measure has been deemed no longer applicable because the required measure was consistent with PM emissions reduction measures required by existing SDAPCD regulations that would be implemented during construction of the Update to the 2018 LRDP. No prescribed mitigation measure is necessary. As demonstrated in the analysis above, with consideration of these standard BMPs required by SDAPCD, construction emissions of PM_{10} and $PM_{2.5}$ would not exceed the applicable standards and no additional mitigation to reduce PM emissions is required.

Revised mitigation measure for the Update to the 2018 LRDP:

Mitigation measure AQ-2B has been updated from the 2018 LRDP EIR to require the use of Tier 4 Final emissions compliant construction equipment to reduce potentially significant NO_X emissions. Changes have been tracked below with strikeout and underlined text denoting text removals and additions, respectively, as compared to the mitigation measure language found in the 2018 LRDP EIR. This change is a result of Tier 4 Final emissions compliant equipment being more readily available since the adoption of the 2018 LRDP EIR as demonstrated by its use in the LRDP's implementation. The measure would achieve greater reductions in emissions than previously written as it would ensure Tier 4 Final equipment is used for equipment over 50 horsepower rather than previously allowed Tier 3 equipment in some cases.

AQ-2B **Minimize Off-Road Construction Equipment Emissions**. UC San Diego shall require by contract specification that all diesel fired construction equipment, equal to or greater than 50 horsepower, ~~the construction contractor use off-road construction diesel engines that~~ meet, at a minimum, the Tier 4 ~~interim~~ Final California Air Resources Board Off Road Compression Ignition Diesel Engine

~~Emissions~~ Standards or equivalent~~, unless such an engine is not available for a particular item of equipment. Tier 3 engines will be allowed on a project-by-project basis when the contractor has documented that no Tier 4 interim equipment or emissions equivalent retrofit equipment is available or feasible for the project~~.

New mitigation measures for the Update to the 2018 LRDP:

Mitigation measure AQ-2C has been added to address operational VOC and CO emissions from area sources. The Update to the 2018 LRDP analysis above assumes Tier 4 compliant generators, consistent with the assumptions of the 2018 LRDP EIR. However, Tier 4 emissions compliant generators were not prescribed as a condition of approval in the 2018 LRDP EIR. Therefore, while no new significant impact has been identified from stationary sources, to ensure proposed new backup emergency generators to be installed in support of development under the Update to the 2018 LRDP achieve these standards, mitigation measure AQ-2D has been added.

AQ-2C **Electric Landscape Equipment**. A minimum of 80 percent of landscape equipment utilized on campus shall be electric powered.

AQ-2D **Minimize Emergency Backup Generator Emissions**. UC San Diego shall require by contract specification that new diesel fired backup generators meet, at a minimum, the U.S. Environmental Protection Agency (USEPA) Tier 4 Final Emissions Standards or equivalent.

Level of Significance After Mitigation

Construction Emissions

Implementation of mitigation measure AQ-2B would ensure that construction activities associated with campus development under the proposed Update to the 2018 LRDP would minimize NO_X emissions. Mitigation measure AQ-2B requires engines in diesel-fueled construction equipment above 50 horsepower to meet Tier 4 Final emission standards or equivalent. Based on the mitigated estimates for the Update to the 2018 LRDP, the use of Tier 4 Final engines for all construction equipment on all projects would result in off-road equipment emission reductions of approximately 67 to 90 percent for NO_X emissions.

Table 3.2-5, *Mitigated Maximum Daily Construction Emissions*, shows the mitigated construction emissions for the 2030 Scenario and the 2040 Scenario of the proposed Update to the 2018 LRDP with implementation of mitigation measure AQ-2B.

Table 3.2-5
Update to the 2018 LRDP Mitigated Maximum Daily Construction Emissions

	Pollutant Emissions (pounds/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2030 Scenario						
West Campus	13.04	22.73	141.66	0.20	18.28	7.35
East Campus	21.68	25.18	160.37	0.20	21.70	8.18
SIO	1.88	11.12	62.22	0.10	5.94	2.85
2030 Scenario Total	*36.60*	*59.02*	*364.25*	*0.50*	*45.92*	*18.38*
2040 Scenario						
West Campus	9.38	31.68	189.53	0.24	33.29	10.93
East Campus	18.74	23.08	140.89	0.21	20.20	7.81
SIO	6.81	16.34	100.87	0.15	13.41	6.24
2040 Scenario Total	*34.94*	*71.11*	*431.29*	*0.60*	*66.90*	*24.98*
Maximum Daily Construction Emissions	**36.60**	**71.11**	**431.29**	**0.60**	**66.90**	**24.98**
Thresholds	137	250	550	250	100	67
Significant Impact?	No	No	No	No	No	No

Source: HELIX 2025
Note: Totals may not sum due to rounding. Values are rounded to the nearest hundredth.
VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; SIO = Scripps Institution of Oceanography.

As shown in Table 3.2-5, with implementation of mitigation measure AQ-2B, construction-generated emissions would not exceed the standards of significance. As such, construction-related emissions would result in a less than significant impact with mitigation, representing a reduction from the significant and unavoidable conclusion in the 2018 LRDP EIR.

Operational Emissions

Implementation of mitigation measure AQ-2C would reduce emissions associated with fossil fuel powered landscape maintenance equipment and mitigation measure AQ-2D would ensure new generators achieve Tier 4 Final Emissions Standards. Table 3.2-6, *Update to the 2018 LRDP Mitigated Operational Emissions*, shows the mitigated operational emissions for buildout of the Update to the 2018 LRDP with implementation of mitigation measure AQ-2C (mitigation measure AQ-2D is assumed in the unmitigated emissions shown above). While operational emissions for all pollutants were shown to be below the applicable thresholds without mitigation when comparing buildout of the Update to the 2018 LRDP SEIR with existing conditions from the 2018 LRDP EIR, the comparison is provided again here to reflect the incorporation of mitigation.

Table 3.2-6
Update to the 2018 LRDP Mitigated Operational Emissions at Buildout (2040)

Emission Source	Pollutant Emissions (pounds/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	184.02	<0.01	179.25	0.01	0.13	0.09
Generators	2.52	16.19	39.88	0.01	0.45	0.43
Natural Gas	1.28	23.30	19.57	0.14	1.77	1.77
Mobile (Commuting)	204.73	129.10	1,572.90	4.48	478.72	122.76
Update to 2018 LRDP Operational Emissions at Buildout (2040)	***392.56***	***168.60***	***1,811.61***	***4.63***	***481.06***	***125.06***
2018 LRDP Operational Emissions at Buildout (2035) (2018 LRDP EIR Table 3.2-8)	265.17	746.24	1,890.11	30.46	849.59	293.35
Net Change Attributable to the Update to the 2018 LRDP	**127.39**	**(577.64)**	**(78.50)**	**(25.83)**	**(368.53)**	**(168.29)**
Thresholds	137	250	550	250	100	67
Substantial Increase?	No	No	No	No	No	No
Adjusted Existing Conditions from 2018 LRDP EIR (2018 LRDP EIR Table 3.2-8)	330.80	1,378.14	3,817.39	32.39	713.79	246.10
Net Change between Update to 2018 LRDP (2040) and Adjusted Existing Conditions from the 2018 LRDP EIR	**61.76**	**(1,209.54)**	**(2,005.78)**	**(27.76)**	**(232.73)**	**(121.04)**
Significant Impact?	No	No	No	No	No	No

Source: HELIX 2024
Note: Totals may not sum due to rounding. Values are rounded to the nearest hundredth.
VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 3.2-6, with implementation of mitigation measure AQ-2C (and AQ-2D which was incorporated in the unmitigated emissions above), pollutant emissions would not exceed the standards of significance when compared to buildout of the 2018 LRDP. In addition, in comparison with the existing conditions disclosed in the 2018 LRDP EIR, there would not be a cumulatively considerable net increase in pollutant emissions. As such, operational emissions would result in a less than significant impact with mitigation, representing a reduction from the significant and unavoidable conclusion in the 2018 LRDP EIR.

3.2.3.3 ISSUE 3 — IMPACTS TO SENSITIVE RECEPTORS

Air Quality Issue 3 Summary

Would implementation of the Update to the 2018 LRDP expose sensitive receptors to substantial pollutant concentrations?

2018 LRDP EIR Significance Conclusion	Less than significant impact (CO hotspots); significant and unavoidable (TAC emissions).
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant impact (CO hotspots); significant and unavoidable (TAC emissions).
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Minimize Off-Road Construction Equipment Emissions (AQ-2B); Minimize Emergency Backup Generator Emissions (AQ-2D).

Summary of Analysis in the 2018 LRDP EIR

Impacts of the 2018 LRDP to sensitive receptors were addressed in Sections 3.2.3.4 and 3.2.3.5 of the 2018 LRDP EIR. Within Section 3.2.3.4 related to CO hotspots, the 2018 LRDP EIR modeled CO concentrations at the worst-case intersection of La Jolla Scenic Drive and La Jolla Village Drive and concluded CO hotspot impacts would be less than significant.

Section 3.2.3.5 of the 2018 LRDP EIR included an evaluation of health risks from the impact of toxic air contaminant (TAC) emissions for construction activities and their effects on nearby receptors, and the exposure to TACs for receptors from mobile sources and on-campus stationary sources, such as emergency generators, boilers, turbines, and the crematory. The 2018 LRDP EIR concluded that while implementation of the 2018 LRDP would not exceed the threshold for on-campus residents and workers, it would exceed the thresholds for cancer risks affecting off-campus residents and workers, as well as both off-campus and on-campus sensitive receptors. Thus, this impact was identified as potentially significant.

Implementation of mitigation measure AQ-2B was anticipated to reduce the construction-related health risk; however, full compliance could not be assured. Additionally, there were no feasible mitigation measures available to address operational mobile-source emissions of PM. Therefore, the 2018 LRDP EIR concluded that a significant and unavoidable impact related to sensitive receptor exposure to TAC emissions would occur.

Proposed Changes that Require Major Revisions to the 2018 LRDP EIR

As described for Issue 2, the Update to the 2018 LRDP is expected to introduce more stationary sources of TACs, potentially increasing the exposure of sensitive receptors to TACs.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP would be undertaken, and there is no new information of substantial importance that has become available related to potential sensitive receptor impacts.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in exposure to sensitive receptors to substantial pollutant concentrations. Quantitative standards of significance related to health risk used in this analysis are based on guidance provided by SDAPCD Rule 1210, as summarized in Table 3.2-7, *Health Risk Standards of Significance*.

Table 3.2-7
Health Risk Standards of Significance

Risk Measured	Standard
Cancer risk	10 in a million excess cancer risk.
Non-cancer acute hazard index	Hazard Index greater than (>) 1.0
Non-cancer chronic hazard index	Hazard Index greater than (>) 1.0

Source: SDAPCD Rule 1210

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

CO Hotspots

Localized elevated CO concentrations, or CO hotspots, are primarily a result of congested motor vehicle activity at intersections. Under specific meteorological conditions (e.g., stable conditions that result in poor dispersion), CO concentrations may reach unhealthy levels for local sensitive land uses. Neither the City of San Diego, nor the SDAPCD have developed a screening methodology for determining when intersection CO concentrations could be potentially significant, requiring further analysis. CO hotpots are typically associated with very high-volume intersections. The Bay Area Air Quality Management District (BAAQMD) has adopted a CO hotspot screening threshold based on intersection volume: project CO hotspot impacts would be less than significant and no further analysis would be required if project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour, or more than 24,000 vehicles per hour per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway; BAAQMD 2017). This screening methodology along with modeled CO concentrations from the 2018 LRDP EIR are considered in the analysis below.

Toxic Air Contaminants

An evaluation of health risks from the impact of TAC emissions from operational activity was performed for the exposure to on- and off-campus residents and workers.

SDAPCD issued supplemental health risk assessment (HRA) guidance in June 2015. The HRA was performed in accordance with the methodologies presented in Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (SDAPCD 2022), Health Risk Assessments for Proposed Land Use Projects (CAPCOA 2009), and Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (Office of Environmental Health Hazard Assessment 2015).

The net change in excess lifetime cancer risk was estimated for the maximally exposed individual worker receptor (MEIW) and for the maximally exposed individual residential receptor (MEIR) at both on-campus and off-campus locations due to the Update to the 2018 LRDP.

Human doses were calculated for the modeled environmental exposures over specified time periods via multiple environmental pathways. These environmental pathways included direct inhalation, soil ingestion, dermal (skin) absorption based on a warm climate, consumption of home grown produce, and mother's milk.

For each TAC, the hazard quotient (HQ) was calculated by dividing the predicted exposure from the model by the reference exposure level (REL) for the substance. The HQs were then summed to calculate the hazard index (HI). Because substances may affect different target organ systems, such as the pulmonary or gastrointestinal systems, the HIs were calculated separately for each target organ system, and the highest HI was used to characterize the potential health risks.

The cancer potency factors and RELs used are consistent with the current values published by CARB (2023). The RELs are intended to represent exposure levels below which adverse health effects do not occur.

The HRA was conducted for multiple exposure durations for different types of sensitive receptors:

- Off-Campus Residents. Exposed for 24 hours/day, 365 days/year, for 30 years beginning at the third trimester before birth during the period of 2040 (buildout of the Update to the 2018 LRDP) through year 2070.
- Off-Campus Workers. Exposed for 8 hours/day, 250 days/year for 25 years during the period of 2040 through year 2065 beginning at age 16.
- On-Campus Residents (Students). Exposed for 24 hours/day, 365 days/year[1] for four years beginning at age 18 during the period of 2040 through year 2044.
- On-Campus University Staff (Workers). Exposed 8 hours/day, 250 days/year for 25 years during the period of 2040 through year 2065 beginning at age 16.

[1] Note that this is conservative because most students only live on campus for three quarters of the year as residential contracts are fall through spring.

The maximum long-term inhalation cancer risk was estimated by multiplying the maximum dose (milligrams per kilogram per day) at the receptor of maximum exposure by the individual cancer potency factor of each carcinogen of concern. Individual risks by each pollutant were summed to determine the total risk at each receptor. Non-cancer health risks for chronic exposure (averaged over one-year) and acute exposure (averaged over 1 hour) were calculated using the HI approach for the receptors and toxic substances emitted.

Sources of TAC emissions considered in the HRA include combustion from emergency generators and the existing crematory, treatment of wastewater, and laboratory sources. A total of 38 additional emergency generator sources were included to support future development, including 2 at the potential wastewater treatment plant that might be needed as part of wastewater capacity requirements (see Section 3.12, Utilities and Service Systems, for additional details). All generators are assumed to meet USEPA Tier 4 engine standards.

Additional details on the HRA methodology are provided in the Subsequent Air Quality Technical Report, which is included in Appendix B of this SEIR.

Impact Analysis

CO Hotspots

Although the screening analyses included in the 2018 LRDP EIR air quality analysis (AECOM 2018) indicated that the 2018 LRDP would not result in a CO hotspot, the analysis conservatively modeled CO concentrations at the worst-case intersection of La Jolla Scenic Drive and La Jolla Village Drive for the 2018 LRDP future (2035) scenario. The analysis concluded that total CO concentrations would reach 6.5 parts per million (ppm) for the 1-hour exposure period and 5.5 ppm for the 8-hour exposure period. Due to the revised methodology for estimating ADT described above, the Update to the 2018 LRDP shows an approximately 7 percent decrease in daily vehicles at the intersection of La Jolla Scenic Drive and La Jolla Village Drive compared to the 2018 LRDP buildout scenario (2035). This reduced ADT would result in fewer CO emissions than disclosed in the 2018 LRDP EIR. Therefore, the CO concentrations resulting from implementation of the Update to the 2018 LRDP would not violate the CAAQS for either the 1-hour period (20 ppm) or the 8-hour period (9.0 ppm).

Additionally, as a result of improvements in technology such as adaptive traffic signals reducing vehicle queue time and vehicle emission standards, CO emission factors are also projected to decrease in future years. These improvements would also reduce the concentration of CO emissions. This reduction can be seen by comparing the ambient monitoring results provided in the 2018 LRDP EIR Table 3.2-2 and those provided in Table 3.2-1 of the SEIR, above. As shown in these two tables, the 8-hour ambient CO concentration decreases each of the sampled years from a high of 3.0 ppm in 2014 to a low of 1.2 ppm in 2022. Therefore, the CO concentrations resulting from implementation of the Update to the 2018 LRDP would not violate the CAAQS for either the 1-hour period (20 ppm) or the 8-hour period (9.0 ppm). As no CO hotspots would be generated by the Update to the 2018 LRDP, no sensitive receptors would be exposed to CO hotspots.

Toxic Air Contaminants

Construction

The greatest potential for TAC emissions resulting from construction associated with implementation of the Update to the 2018 LRDP would originate from diesel particulate matter

(DPM) emissions associated with heavy equipment operations. Construction would result in the generation of DPM from the use of off-road diesel construction equipment required for demolition, site preparation, construction, and equipment installation. Most DPM associated with material delivery trucks and construction worker vehicles would occur off-campus.

The generation of DPM from construction projects typically occurs in a single area for a short period of time; however, the exact length of construction time periods for individual projects implemented under the Update to the 2018 LRDP is unknown at this time due to the lack of design details and phasing aside from it occurring in the 2030 Scenario or 2040 Scenario. As shown previously in Table 3.2-3, construction associated with the Update to the 2018 LRDP is estimated to result in a maximum of 74.91 pounds of PM_{10} per day prior to the implementation of mitigation. This can be compared to, and is less than, the PM_{10} emissions reported for the 2018 LRDP of 109 pounds per day. Because PM_{10} emissions associated with the Update to the 2018 LRDP are less than those disclosed for the 2018 LRDP, it can be concluded that the cancer risks associated with exposure to DPM would also be reduced.

Operation

New operational stationary sources of TACs would include combustion, laboratory sources, and the treatment of wastewater. Development of the Update to the 2018 LRDP would also generate trips on local and regional roadways. However, the Update to the 2018 LRDP would result in reduced ADT and VMT. Therefore, DPM emissions from vehicle trips due to the Update to the 2018 LRDP would be less than those previously disclosed in the 2018 LRDP EIR and have been excluded from further analysis.

The cancer risk, non-cancer chronic health risk, and non-cancer acute health risk due to new stationary source emissions were calculated for comparison to the thresholds identified in Table 3.2-7. Table 3.2-8, *Update to the 2018 LRDP Operational Health Risk*, presents the on- and off-campus MEIR and MEIW receptors during the 30 years and 25 years of exposure, respectively, due to the operation of stationary sources associated with the Update to the 2018 LRDP. For the MEIR, it is assumed that one person lives in the same location for 30 years and that exposure begins at the third trimester through age 30. Therefore, modeling assumed a 30-year exposure beginning in 2040, the buildout year of the Update to the 2018 LRDP. Similarly, for the MEIW assumed to begin at age 16, modeling was run with the same assumptions beginning in 2040 through 2065 for a 25-year exposure period.

Table 3.2-8
Update to the 2018 LRDP Operational Health Risk

Receptor Type	Cancer Risk (per million)	Chronic Hazard Index	Acute Hazard Index
On-Campus MEIR	0.04	0.02	0.22
On-Campus MEIW	0.38	0.05	0.29
Off-Campus MEIR	2.63	0.03	0.21
Off-Campus MEIW	0.19	0.03	0.21
Peak Value	2.63	0.05	0.29
Threshold	10	1	1
Significant Impact?	No	No	No

Source: HELIX 2025

As shown in Table 3.3-8, the incremental increase in cancer risk from the Update to the 2018 LRDP is less than the threshold of 10 per million for all receptors on- and off-campus. Additionally, the chronic and acute hazard index is less than the threshold of 1 for all receptors on- and off-campus. Therefore, buildout of the Update to the 2018 LRDP would not result in a substantial increase in the exposure of sensitive receptors to substantial TAC emissions. Nonetheless, in combination with sources of TACs analyzed in the 2018 LRDP EIR, health risk from campus operations would exceed applicable standards.

Level of Significance Before Mitigation

CO hotspot impacts would be less than significant, consistent with the conclusion in the 2018 LRDP EIR. While the increases in TACs from the Update to the 2018 LRDP would not be substantial, the impact would remain potentially significant, consistent with the conclusion of the 2018 LRDP EIR.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

None.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

While no new significant impact related to TACs is identified, mitigation measure AQ-2B has been revised above and would further reduce the construction-related health risk associated with implementation of the Update to the 2018 LRDP, as identified in the 2018 LRDP EIR. Mitigation measure AQ-2D also provides enforceability of the assumption that all backup generators would achieve Tier 4 standards. As was the case in the 2018 LRDP EIR, no further feasible mitigation measures are available to reduce the combined health risk of mobile source and stationary source emissions.

Level of Significance After Mitigation

CO hotspot impacts remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR. TAC impacts would be significant and unavoidable, consistent with the conclusion in the 2018 LRDP EIR.

3.2.3.4 ISSUE 4 — ODOR EMISSIONS

Air Quality Issue 4 Summary

Would implementation of the Update to the 2018 LRDP result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

2018 LRDP EIR Significance Conclusion	No potential impact.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	Yes.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Odor Control Plan for Potential Wastewater Treatment Plant (AQ-4)

Summary of Analysis in the 2018 LRDP EIR

The 2018 LRDP EIR addressed potential odor impacts in Section 3.2.5 and concluded that construction and operational activities associated with implementation of the 2018 LRDP would not create objectionable odors affecting a substantial number of people and there would be no potential for an impact to occur.

Proposed Changes that Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP could require construction of a wastewater treatment plant that has the potential to generate odorous emissions near sensitive receptors.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP would be undertaken, and there is no new information of substantial importance that has become available related to odors.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in the generation of odorous emissions that would adversely affect a substantial number of people.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

With the exception of a potential wastewater treatment plant that may be constructed as part of mitigation addressing wastewater capacity (see Section 3.12, *Utilities and Service Systems*, of this SEIR), sources of odors associated with the Update to the 2018 LRDP are anticipated to be consistent with those identified in the 2018 LRDP EIR for construction and operations.

Impact Analysis

Construction

Potential sources that may emit odors during construction of development associated with the Update to the 2018 LRDP would include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions and the highly diffusive properties of diesel exhaust, nearby receptors would not be anticipated to be adversely affected by diesel exhaust odors associated with construction activities. Construction activities under the proposed Update to the 2018 LRDP would utilize typical construction techniques, and the odors from off-road equipment and on-road vehicles would be typical of most construction sites and temporary in nature. Therefore, construction activities would not result in objectionable nuisance odors, consistent with the 2018 LRDP EIR.

Operation – Wastewater Treatment Plant

Section 3.12, *Utilities and Service Systems*, of this SEIR, includes an analysis of wastewater capacity needed for the Update to the 2018 LRDP. Mitigation measure Util-2, Downstream Wastewater Capacity, describes requirements for infrastructure improvements, including either upsizing existing sewer lines or constructing a wastewater treatment plant to offload a portion of sewer flows (or both).

If constructed, operation of a wastewater treatment plant has the potential to result in odor impacts because of the nature of the activities at this type of facility. Odors are typically associated with particular steps in the wastewater treatment process. Initially, raw wastewater is transferred to the primary clarifiers where most solids are separated from the liquid portion of wastewater in the treatment process. Wastewater undergoing aerobic digestion (decomposition with free oxygen) in an aeration basins emit a characteristically musty odor due to the particular type of biogases released in the process.

Facilities that cause nuisance odors are subject to enforcement action by the SDAPCD. The SDAPCD responds to odor complaints by investigating the complaint determining whether the odor violated SDAPCD Rule 51. The inspector will take enforcement action if the source is not in compliance with SDAPCD rules and regulations and will inform the complainant of investigation results. In the event of enforcement action, odor-causing impacts must be mitigated by appropriate means to reduce the impacts to sensitive receptors. Such means include shutdown of odor sources or requirements to control odors using add-on equipment. Without controls, odors from the wastewater treatment plant, if it is required, could result in a potentially significant impact related to objectionable odors.

Operation – Residential and Institutional Land Uses

The Update to the 2018 LRDP's residential and institutional land uses would not add new operational odor sources, and odors generated would be similar to existing odors associated with land uses in the area. The Update to the 2018 LRDP results in minor adjustments to the land use plan but does not introduce any new land uses to the campus. The land uses associated with the Update to the 2018 LRDP would include institutional, research, residential, academic, and commercial, which are consistent with existing campus uses and land use designations and not typically large generators of odor emissions. As a result, operational activities associated with implementation of the Update to the 2018 LRDP would not create objectionable odors affecting a substantial number of people.

Level of Significance Before Mitigation

Odor impacts associated with construction and operation of residential and institutional land uses would be less than significant, consistent with the conclusion in the 2018 LRDP EIR. If necessitated by implementation of mitigation measure Util-2, operation of the wastewater treatment plant could generate odors adversely affecting a substantial number of people and the impact would be potentially significant. This is a new impact compared to the 2018 LRDP EIR.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

No mitigation measures were required in the 2018 LRDP EIR.

New mitigation measures for the Update to the 2018 LRDP:

Mitigation measure AQ-4 is prescribed to reduce odors associated with the wastewater treatment plant, if needed.

AQ-4 **Wastewater Treatment Plant Odor Controls.** The following measures shall be implemented to control odors if the wastewater treatment plant is required as part of implementation of mitigation measure Util-2:

- As relevant, all wastewater treatment plant facilities shall be designed to minimize odors, including the addition of water misting, chemical additives or activated carbon, as required.
- All wastewater treatment plant facilities shall be covered or housed to avoid uncontrolled odor release.
- Active odor control units shall be located to manage gases from the wet and solids stream treatment processes.
- A misting system with odor neutralizing liquids to break down the foul-smelling chemical compounds in the biogases shall be installed.
- Bio filters shall be utilized to capture odor causing compounds in a media bed where they are oxidized by naturally occurring micro-organisms.

Level of Significance After Mitigation

Implementation of mitigation measure AQ-4 would ensure the odor control design for the potential wastewater treatment plant would be such that no objectionable odors would be detected by nearby residences or other sensitive receptors. Additionally, disposal of biosolids at landfill sites could also contribute to odors and increase air emissions at these end-use facilities. However, the County would only allow facilities that have addressed all site-specific impacts. Therefore, the impact would be less than significant with mitigation. This represents a change from the conclusion identified in the 2018 LRDP EIR that no impact could occur; however, the impact would remain below a level of significance.

3.2.4 CUMULATIVE IMPACTS AND MITIGATION

Air Quality Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative air quality impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Consistency with applicable air quality plan.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Cumulatively considerable net increase of nonattainment criteria pollutants.	Significant and unavoidable.	Cumulatively considerable.	Significant and unavoidable.	Not cumulatively considerable with AQ-2B and AQ-2C.
Expose sensitive receptors to substantial pollutant concentrations.	Significant and unavoidable.	Cumulatively considerable.	Significant and unavoidable.	Cumulatively considerable, even with AQ-2B and AQ-2D.
Odor emissions.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable with AQ-4.

The geographic extent for cumulative effects on air quality is defined as the SDAB. For purposes of air quality, the cumulative impact analysis looks beyond cumulative projects and instead focuses on the average cumulative air quality conditions within the SDAB from day to day. By its very nature, air pollution is largely a cumulative impact. Past, present, and future development projects

contribute to the region's air quality issues on a cumulative basis. No single project is sufficient in size to, by itself, result in regional nonattainment of ambient air quality standards. A project that has a significant direct impact on air quality with regard to emissions of PM_{10}, $PM_{2.5}$, NO_X, or VOCs, as evidenced by exceeding the Screening Level Thresholds (shown in Table 3.2-2), would also have a significant cumulatively considerable net increase.

Consistency with Applicable Air Quality Plan

The 2018 LRDP EIR concluded that since the 2018 LRDP would be consistent with the applicable air quality plan, it would not result in a cumulatively considerable contribution to a cumulative impact related to air quality plans. Similarly, as discussed under Issue 1 above, the proposed Update to the 2018 LRDP proposes land uses consistent with the current campus land use types and would result in VMT below the regional average, consistent with land use and growth strategies in the air quality plans for the SDAB. As such, the cumulative impact related to air quality plans would be less than significant and the Update to the 2018 LRDP would not result in a cumulatively considerable contribution to a significant air quality plan cumulative impact, consistent with the conclusion in the 2018 LRDP EIR.

Cumulatively Considerable Net Increase of Nonattainment Criteria Pollutants

The 2018 LRDP EIR concludes that since the 2018 LRDP would result in emissions exceeding the applicable thresholds, it would result in a cumulatively considerable contribution to cumulative regional air quality impacts. As the SDAB remains a nonattainment area for ozone, $PM_{2.5}$, and PM_{10}, cumulative projects identified in Table 3-1 in addition to other future development would result in a significant cumulative impact for criteria pollutants. The Update to the 2018 LRDP would individually result in construction emissions exceeding the applicable threshold for NO_X and operational emissions exceeding the applicable thresholds for VOC and CO; however, CO is not a pollutant for which the SDAB is a nonattainment region. As described above, mitigation measure AQ-2B would reduce construction-generated emissions and mitigation measure AQ-2C would reduce VOC emissions during operations below a level of significance. In addition, buildout of the Update to the 2018 LRDP would decrease pollutant emissions for NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$, and increase VOC emissions by less than the applicable threshold when compared to the existing conditions disclosed in the 2018 LRDP EIR. Therefore, the proposed Update to the 2018 LRDP would not result in a cumulatively considerable contribution to the significant cumulative impact related to SDAB nonattainment for ozone (precursors VOC and NO_X) or PM. This is a reduction in the impact identified in the 2018 LRDP EIR.

Expose Sensitive Receptors to Substantial Pollutant Concentrations

The 2018 LRDP EIR concludes there would be no cumulative impact related to CO hotspots given no project-level impact would occur. However, the 2018 LRDP EIR identified that a significant cumulative impact on sensitive receptors could result from TAC emissions, and the contribution of the 2018 LRDP to this impact was considered cumulatively considerable.

Consistent with the 2018 LRDP EIR conclusion for CO hotspots, cumulative development in the campus vicinity is not anticipated to generate a CO hotspot and no significant cumulative impact for the Update to the 2018 LRDP would occur.

However, emissions from construction activities, mobile, and stationary sources in the region could expose receptors to substantial pollutant concentrations, resulting in a significant cumulative

impact for TAC emissions. As identified above, the Update to the 2018 LRDP would decrease TAC emissions during construction, decrease DPM emissions from mobile sources, and would not result in a significant increase in health risk from other sources of TACs. Nonetheless, in combination with other sources of TACs analyzed in the 2018 LRDP EIR, a significant impact to sensitive receptors would occur even with mitigation measures AQ-2B and AQ-2D. Therefore, there would be a significant cumulative impact related to TAC emission exposure and buildout of the Update to the 2018 LRDP would result in a cumulatively considerable contribution to this impact, though it is noted that the increase in TAC emissions from the Update to the 2018 LRDP alone would not be substantial.

Odor Emissions

As the 2018 LRDP EIR concluded there would be no potential for an impact from odors to occur, the 2018 LRDP would also not be considered to result in a considerable contribution to a cumulative impact. Emissions that generate odors have more localized impacts compared to criteria pollutants, which affect air quality on a basin-wide scale. Therefore, given the anticipated distance between development on campus and other cumulative projects with odor-generating components, it is not anticipated that a significant cumulative impact related to odors would occur. During construction, odors from concurrent development nearby could combine and intensify the overall odor effects. However, these emissions from other projects would be temporary and would diffuse with distance.

During operation, most of the land uses anticipated to be developed on or near the campus are residential or institutional uses, which do not typically generate substantial odors. As described above, with implementation of mitigation measure AQ-4, emissions from a wastewater treatment plant, if it is required, would not generate significant odors. Therefore, development under the Update to the 2018 LRDP would not combine with nearby cumulative projects to generate significant odor impacts. Odor emissions would not result in a significant cumulative impact during construction or operation.

3.2.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under air quality are evaluated above. There are no CEQA issues where there is no potential for a significant effect related to air quality.

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3.3 BIOLOGICAL RESOURCES

This section of the SEIR evaluates the potential for biological impacts associated with implementation of the Update to the 2018 LRDP. This section then evaluates whether new or substantially more severe environmental impacts related to biological resources would result from the proposed Update to the 2018 LRDP compared to those identified in Section 3.3 of the EIR certified for the 2018 LRDP.

The analysis in this section of the SEIR is based on the Addendum to the Biological Resources Technical Report (BRTR) that was prepared for the Update to the 2018 LRDP that provides updated information about biological species sensitivity designations (HELIX 2025) and is included as Appendix C of this SEIR.

3.3.1 ENVIRONMENTAL SETTING

The biological resources present on the UC San Diego La Jolla campus and the surrounding areas is described in detail in Section 3.3, *Biological Resources*, of the 2018 LRDP EIR, including a discussion of biological survey methods, vegetation communities, jurisdictional areas (such as wetlands), sensitive plant and animal species, special interest animal species, and the UC San Diego Habitat Management Plan (HMP). This section focuses on changes from information disclosed in the 2018 LRDP EIR and provides an updated analysis of impacts on biological resources relative to revisions proposed in the Update to the 2018 LRDP and current regulations.

3.3.1.1 BIOLOGICAL SURVEY METHODS

The analysis contained herein relies on the biological resources data collected for the 2018 LRDP EIR (HELIX 2018). The Update to the 2018 LRDP includes potential development of one undeveloped site within lands designated as Urban Forest and one undeveloped site within lands designated as Restoration Lands in the University's Open Space Preserve Open Space Preserve that was not previously analyzed in the 2018 LRDP EIR and the BRTR prepared for the 2018 LRDP EIR. These proposed increases in land use development for the Update would result in minor expansions into sensitive vegetation communities beyond the limits addressed in the 2018 LRDP EIR, as discussed in Section 3.3.3.1. Minor Open Space Preserve boundary adjustments of Urban Forest north of Gilman Drive at Pepper Canyon and east of the Geisel Library would not result in removal of sensitive vegetation communities. No additional biological resources surveys were conducted for this SEIR, given the relatively recent biological analysis in the 2018 LRDP EIR, which contains detailed baseline data. Additionally, the proposed development in the Update to the 2018 LRDP focuses primarily on previously developed sites. As discussed in the BRTR, site-specific surveys and vegetation mapping completed since surveys and mapping were conducted for the 2018 LRDP were reviewed and confirmed that mapping remains generally consistent. Further, projects identified in the Update to the 2018 LRDP would be built out over the course of several years, through 2040, and projects proposed within undeveloped lands would require updated project-specific biological surveys in accordance with the mitigation measures contained herein (see mitigation measures Bio-1A, Bio-2A, Bio-2C, Bio-2F, Bio-2G, Bio-3A, and Bio-4), which would provide current data at the project level as individual projects move forward.

3.3.1.2 VEGETATION COMMUNITIES

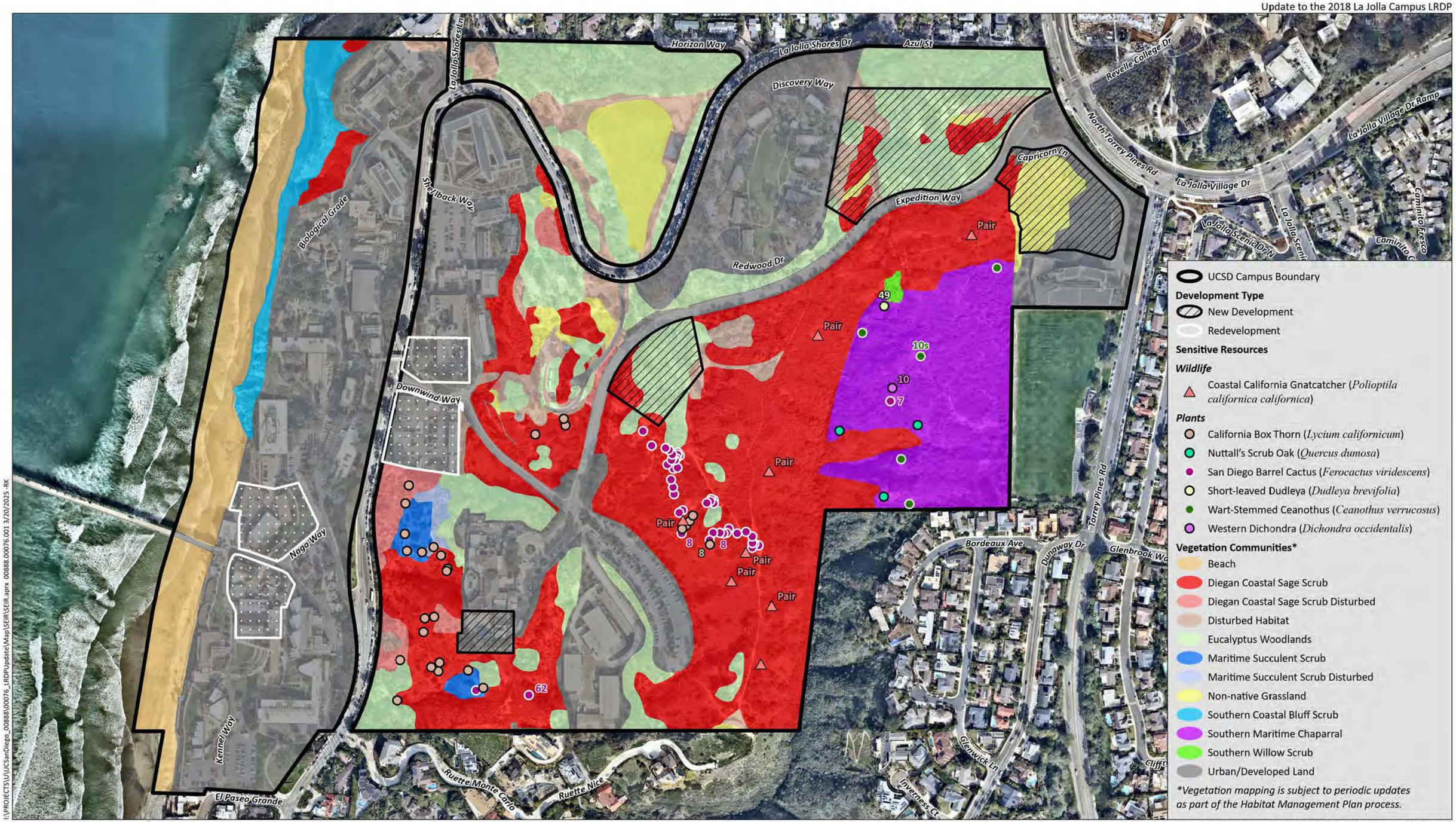
Existing vegetation communities within the campus have not substantially changed since preparation of the 2018 LRDP EIR. The 2018 LRDP EIR identified 16 vegetation communities and land use types on UC San Diego including beach and developed land (refer to 2018 LRDP EIR Figures 3.3-1, 3.3-2, 3.3-3, *Vegetation and Sensitive Biological Resources/Impacts* for SIO, West Campus and East Campus, respectively). The campus Open Space Preserve contains protected vegetation communities, as seen on Figure 2-4, *Updated Open Space Preserve*, of this SEIR. While the Update to the 2018 LRDP would alter the Open Space Preserve boundaries in some locations, it does not result in a net reduction in Open Space Preserve lands. The open space designations include Ecological Reserve, Restoration Lands, Urban Forest and Historic Grove. As described in Section 2.0 of this SEIR, Project Description, and in the BRTR, potential new utility infrastructure required to accommodate campus growth (electrical substation and wastewater treatment plant) would be sited within existing Open Space Preserve areas (Urban Forest and Restoration Land types), requiring a change in land use in these areas to General Services. The Urban Forest type of Open Space Preserve land use category in the northern portion of the West Campus would be reduced by approximately 4 acres, and this loss would be accommodated by expanding the Open Space Preserve in the East Campus and SIO, as described in the following subsections (see Figure 2-4). The Restoration Lands area in the southern portion of the West Campus would be reduced by approximately 0.7 acre, which would be accommodated by expanding the Restoration Lands area immediately east of the removed site.

3.3.1.3 AQUATIC RESOURCE JURISDICTIONAL AREAS

As described in 3.3.1.3 of the 2018 LRDP EIR, jurisdictional delineations were not conducted as part of the biological survey efforts due to the programmatic nature of the LRDP; similarly, none were conducted for the Update. Wetlands and non-wetland waters potentially subject to regulatory jurisdiction of the USACE pursuant to Section 404 of the Clean Water Act (CWA; 33 United States Code [USC] 1344), the Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the CWA and/or the State Porter-Cologne Water Quality Control Act, the CDFW pursuant to Sections 1600 et seq. of the California Fish and Game (CFG) Code, and the CCC pursuant to the California Coastal Act occur within the UC San Diego La Jolla campus. Like the 2018 LRDP EIR, this SEIR is programmatic, and future projects implemented under the Update to the 2018 LRDP may require site-specific delineations and regulatory permits issued by the above-listed agencies, as determined to be necessary during the project planning process per mitigation measure Bio-4.

3.3.1.4 SENSITIVE PLANT AND ANIMAL SPECIES

As stated above in Section 3.3.1.1, no additional biological resources surveys were conducted for this SEIR based upon the relatively recent completion of the 2018 LRDP EIR biological analysis, and the detailed baseline data contained in that document (HELIX 2018). This discussion therefore focuses on the sensitivity designations of the species identified in the previous biological analysis. Plant and wildlife species are considered sensitive for purposes of inclusion in this SEIR if they are federally listed as threatened or endangered, state listed as threatened or endangered, listed as a state fully protected species, listed as a state species of special concern, or listed as a California Native Plant Society California Rare Plant Rank (CRPR) List 1 or 2 species. As a programmatic document guiding growth and development of the La Jolla Campus through a 2040 horizon year, it is acknowledged that the status of sensitive species, including those listed as threatened or endangered, may change over time due to evolving environmental conditions, conservation efforts,



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0 350 Feet

Source: Aerial (SanGIS, 2023); Vegetation (HELIX 2025); Sensitive Resources (HELIX 2016)

HELIX Environmental Planning

Vegetation and Sensitive Biological Resources/Impacts - SIO

Figure 3.3-1

UCSD Campus Boundary

Development Type

New Development

Redevelopment

New Impacts to Vegetation beyond the Limits of the 2018 LRDP

Sensitive Resources

Wildlife

Belding's Orange-throated Whiptail (*Aspidoscelis hyperythra beldingi*)

Coastal California Gnatcatcher (*Polioptila californica californica*)

Cooper's Hawk (*Accipiter cooperii*)

Yellow-breasted Chat (*Icteria virens*)

Plants

Ashy Spike-moss (*Selaginella cinerascens*)

California Box Thorn (*Lycium californicum*)

Nuttall's Scrub Oak (*Quercus dumosa*)

San Diego Barrel Cactus (*Ferocactus viridescens*)

Short-leaved Dudleya (*Dudleya brevifolia*)

Wart-Stemmed Ceanothus (*Ceanothus verrucosus*)

Western Dichondra (*Dichondra occidentalis*)

San Diego County Sunflower (*Bahiopsis laciniata*)

Vegetation Communities*

Chaparral/Eucalyptus Woodland Ecotone

Diegan Coastal Sage Scrub

Diegan Coastal Sage Scrub Disturbed

Disturbed Habitat

Eucalyptus Woodlands

Herbaceous Wetland

Mule Fat Scrub Disturbed

Non-native Grassland

Non-native Grassland Disturbed

Southern Maritime Chaparral

Southern Mixed Chaparral

Southern Willow Scrub

Urban/Developed Land

**Vegetation mapping is subject to periodic updates as part of the Habitat Management Plan process.*

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Source: Aerial (SanGIS, 2023); Vegetation (HELIX 2025); Sensitive Resources (HELIX 2016)

HELIX Environmental Planning

Vegetation and Sensitive Biological Resources/Impacts - West Campus

Figure 3.3-2

UCSD Campus Boundary

Development Type

New Development

Redevelopment

Sensitive Resources

Wildlife

Yellow Warbler (*Setophaga petechia*)

Vegetation Communities*

Diegan Coastal Sage Scrub

Diegan Coastal Sage Scrub Disturbed

Disturbed Habitat

Disturbed Wetland

Eucalyptus Woodlands

Herbaceous Wetland

Mule Fat Scrub

Native Grassland

Non-native Grassland

Southern Mixed Chaparral

Southern Willow Scrub

Urban/Developed Land

**Vegetation mapping is subject to periodic updates as part of the Habitat Management Plan process.*

Voigt Dr

Campus Point Dr

Gilman Dr

5

Health Sciences Dr

Medical Center Dr

Athena Way

Eastgate Mall

Athena Cir

Executive Dr

Miramar St

Regents Park Row

La Jolla Village Dr

Regents Rd

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0 400 Feet

Source: Aerial (SanGIS, 2023); Vegetation (HELIX 2025); Sensitive Resources (HELIX 2016)

HELIX Environmental Planning

Vegetation and Sensitive Biological Resources/Impacts - East Campus

Figure 3.3-3

and regulatory reviews. Species not currently listed as threatened or endangered may be added to state or federal lists if population declines or habitat threats emerge, while others may be delisted as a result of successful recovery efforts. Future projects and actions covered under this SEIR may incorporate new listings or delistings as they arise, following applicable regulatory requirements and conducting necessary assessments to ensure compliance with updated environmental protection standards.

Sensitive Plant Species

The sensitivity designation of plant species on UC San Diego has not substantially changed since preparation of the 2018 LRDP EIR. Four sensitive plant species were observed on UC San Diego during the 2016 biological surveys conducted for the 2018 LRDP EIR: Nuttall's scrub oak (*Quercus dumosa*), San Diego barrel cactus (*Ferocactus viridescens*), Torrey pine (*Pinus torreyana* ssp. *torreyana*), and wart-stemmed ceanothus (HELIX 2018). Two additional species, short-leaved dudleya (*Dudleya brevifolia*) and San Diego adolphia (*Adolphia californica*) were not observed in 2016 or during subsequent surveys but have been documented in previous surveys (HELIX 2018). The sensitivity designations for these species have not changed since preparation of the 2018 LRDP EIR, and no plant species with the potential to occur on campus that were previously undesignated have been designated as sensitive since preparation of the 2018 LRDP EIR.

Sensitive Animal Species

The sensitive animal species addressed in the 2018 LRDP EIR remain sensitive and subject to analysis in this SEIR. Six sensitive animal species were observed or otherwise detected on UC San Diego during 2016 surveys: coastal California gnatcatcher, Cooper's hawk (*Accipiter cooperii*), orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), peregrine falcon (*Falco peregrinus*), yellow-breasted chat (*Icteria virens*), and yellow warbler (*Setophaga petechia*) (HELIX 2018). Additionally, two CDFW species of special concern (two-striped garter snake [*Thamnophis hammondii*] and San Diego black-tailed jackrabbit [*Lepus californicus bennettii*]) had been historically detected and may still occur. While least Bell's vireo (*Vireo bellii pusillus*) has not been observed in recent surveys, the species still has a potential to occur on the site of future projects due to the presence of suitable riparian habitat (refer to Section 3.5.3 of the BRTR for the 2018 LRDP for additional discussion related to this species; HELIX 2018).

Since 2018, the following three insect species that occur in the San Diego region have either been listed or proposed for listing under the federal (FESA) or state (CESA) Endangered Species Act: Crotch's bumble bee (*Bombus crotchii*), Hermes copper butterfly (*Lycaena hermes*), and monarch butterfly (*Danaus plexippus*). Thus, this SEIR incorporates additional information to address these species in the context of both the LRDP and Update to the 2018 LRDP. Other sensitive species previously documented on campus and discussed in the 2018 LRDP EIR are not included in the below summary as this is not new biological resources information. Potential impacts to these species resulting from the Update to the 2018 LRDP are discussed in Issues 1 and 2.

Crotch's Bumble Bee (*Bombus crotchii*)

For details on the distribution and habitat for Crotch's bumble bee, please refer to Appendix C. A search of available biological database records and community science applications have not reported Crotch's bumble bee on campus to date, and no recent CNDDB records were found for this species near campus. The nearest iNaturalist record is approximately four miles south of campus at Kate Sessions Memorial Park, followed by an observation in Tierrasanta, approximately seven miles

southeast of campus, and multiple observations in Mission Trails Regional Park, approximately eight miles southeast of campus. Based on the recent records of the species in the San Diego region and suitable habitat on campus, this species has moderate to high potential to occur on campus within undeveloped natural areas with suitable nectar and pollen sources, specifically in Diegan coastal sage scrub, maritime succulent scrub, southern mixed chaparral, southern coastal bluff scrub, southern maritime chaparral, native grassland, and non-native grassland habitats, which occur primarily within conserved Ecological Reserve and Restoration Lands on East Campus, West Campus, and SIO.

Hermes Copper Butterfly (*Lycaena hermes*)

For details on the distribution and habitat for Hermes Copper Butterfly, please refer to Appendix C. Hermes copper butterfly has not been documented on campus and is not expected to occur. Although suitable habitat is present within portions of southern maritime chaparral in the Ecological Reserve on the SIO portion of campus, no extant Hermes copper populations are known west of I-15 (I-15 is approximately seven miles east of campus); based on approximately 20 years of survey data through 2019, fire and drought have extirpated all populations except those that are at higher elevations further east in San Diego County. The nearest recent observation is over 20 miles east of campus. The largest extant populations of Hermes copper are concentrated south of I-8, from the Jamul area east into the Cleveland National Forest.

Monarch Butterfly (*Danaus plexippus*)

For details on the distribution and habitat for the Monarch Butterfly, please refer to Appendix C. Suitable overwintering habitat for the monarch butterfly are found within the Historic Grove and Urban Forest areas on campus, both of which are dominated by eucalyptus trees, which are non-native species planted widely on campus. Two main overwintering sites were identified on campus in 1997: (1) near the Faculty Club and Mandeville Center on West Campus north of Gilman Drive and south of Voigt Drive; and (2) the Coast/Azul site on the SIO portion of campus west of North Torrey Pines Road and south of Azul Street.

The greatest number of overwintering monarchs recorded on campus was in 1997 (the first year of recorded data collection), when approximately 8,000 individuals were observed at the Faculty Club/Mandeville Center site, approximately 2,400 individuals were observed at the Coast Apartments/Azul Street site, and smaller numbers were documented near the Ché Café and Weiss Theater north of La Jolla Village Drive on West Campus. The Faculty Club/Mandeville Center site and Weiss Theater sites are both located within Historic Grove on West Campus, the Ché Café site is located in Urban Forest on West Campus, and the Coast Apartments/Azul Street site is located in Urban Forest at SIO. The total number of overwintering monarchs observed on campus in 1997 was approximately 10,890, followed by only 1,495 individuals in 1998, and dropping to 15 individuals in 1999. Between 1999 and 2023, recorded observations of overwintering monarchs on campus have ranged from zero to 150, with fewer than 20 overwintering monarchs reported each year between 2016 and 2023 (Xerces Society Western Monarch Count 2024).

Bird Strikes

In addition to the above discussions of insect species listed or proposed for listing since the 2018 LRDP EIR, this document also incorporates design measures to reduce the potential for bird strikes with new buildings on campus. As the campus continues to grow and densify, bird collisions with buildings become a higher probability. Bird-safe design standards can help reduce the likelihood of

migrating and dispersing birds striking a building, including sensitive bird species. Bird strikes against buildings, particularly windows, are a major source of human-related bird mortality, with rough estimates of between 100 million and one billion birds killed annually in the U.S. from building collisions (S.R. Loss et al, 2014). Given the documented declines of many bird species from multiple combined causes in the San Diego region and statewide from issues such as habitat loss and fragmentation, urbanization and human disturbance, and effects related to climate change, as well as the location of the campus along migratory corridors, incorporating bird-safe design standards for future campus development can help reduce some of these losses.

3.3.1.5 SPECIAL INTEREST ANIMAL SPECIES

The monarch butterfly was the only animal identified as a special interest animal species by CDFW in the 2018 LRDP EIR. As stated above, the monarch butterfly has since been proposed for listing under the FESA. No other special interest animal species with the potential to occur on campus have since been identified by CDFW.

3.3.2 REGULATORY FRAMEWORK

As described in Section 3.3.2 of the 2018 LRDP EIR, biological resources on UC San Diego are subject to regulatory administration by the federal government and State of California. Currently, the federal government administers nonmarine plant and wildlife-related issues through the USFWS, while waters of the U.S. are administered by the USACE. California law relating to wetlands, water-related, and wildlife issues is administered by CDFW. Under CEQA, impacts associated with a proposed project or program are assessed regarding significance criteria determined by the CEQA Lead Agency (in this case, UC San Diego) pursuant to CEQA Guidelines. Laws and regulations related to biological resources that apply include the FESA, Migratory Bird Treaty Act (MBTA), CWA, CEQA, CESA, and CFG Code. The following section focuses on new or updated regulations and guidance that have occurred since preparation of the 2018 LRDP EIR.

3.3.2.1 FEDERAL

Migratory Bird Treaty Act

The MBTA of 1918 (16 USC 703-711) implements an international treaty for the conservation and management of bird species that may migrate through more than one country. In January of 2021, attempts were made to limit the scope of the MBTA before the USFWS published a final rule revoking restrictive regulation. The MBTA continues to prohibit incidental take and apply enforcement discretion, consistent with the judicial precedent and long-standing agency practice.

3.3.2.2 UC SAN DIEGO

Habitat Management Plan

The HMP has been updated since preparation of the 2018 LRDP EIR. In 2010, a HMP was prepared for the management of open space on UC San Diego pursuant to the Open Space Management Program (OSMP) detailed within the 2004 LRDP EIR (HELIX 2004; 2010). The HMP takes the OSMP one step farther by providing specific direction for the preservation and long-term management of the Ecological Reserve and expands upon the applicable management guidelines that were identified in the 2004 LRDP EIR. An updated HMP was prepared in 2019 to address updated

campus open space designations and Ecological Reserve boundaries implemented with the 2018 LRDP and replaces the former HMP prepared for the Ecological Reserve in 2010 (HELIX 2019). Like the 2010 HMP, the 2019 HMP is consistent with the OSMP described in the 2018 LRDP EIR and expands upon the applicable management guidelines identified in the 2018 LRDP.

Tree Preservation Guidelines

In 2024, UC San Diego created the campus Tree Preservation Guidelines, which are expected to be incorporated into the UC San Diego Design Guidelines in 2025. The Tree Preservation Guidelines must be considered by all projects and are intended to maintain and expand the campus tree canopy coverage over time. The guidelines recognize the importance of tree canopy as a valuable natural resource for both wildlife and people and aligns with campus climate adaptation and resilience efforts. It applies to any development, renovation, or maintenance project that includes trees in its project boundaries. The guidelines require projects to prioritize the preservation of existing trees in all areas of campus and it outlines robust alternatives to tree removal when preservation-in-place is not feasible. The campus Open Space Committee reviews and advises on projects where alternatives to tree preservation are required, such as payment into the campus urban forestry fund.

3.3.3 PROJECT IMPACTS AND MITIGATION

The following sections describe the potential for new or substantially more severe impacts to biological resources anticipated to occur because of the implementation of the Update to the 2018 LRDP compared to those analyzed in the 2018 LRDP EIR. Sensitive species or vegetation impacts associated with the implementation of the Update to the 2018 LRDP can be direct and indirect. Direct impacts are those associated with direct destruction or displacement of natural habitats during construction and typically occur during the site preparation stage when grading, clearing, grubbing, and other initial land disturbance activities take place. Indirect impacts are those that are not a result of direct land disturbance activities. Indirect impacts include impacts such as water quality degradation, litter/trash, fugitive dust, and introduction of non-native plant species, edge effects, increased human activity, animal behavioral changes, roadkill, night lighting, and noise. Indirect impacts can occur during all stages of construction and can also occur after construction is complete because of increased human activity or from operation of the development itself, such as impacts from the development's lighting or noise.

Due to the programmatic nature of this analysis, it is anticipated that actual development sites could vary somewhat from those depicted in this SEIR due to their preliminary nature and individual project details that are not yet known. Future projects that could fall within the potential development areas depicted in Figures 3.3-1 through 3.3-3 may be refined when project grading and building locations are developed and project-level CEQA review is completed. In addition, the analysis assumes that the future development of storm water conveyances and structures may be required in slopes, drainages, or other lower elevation areas on UC San Diego to comply with National Pollutant Discharge Elimination System (NPDES) Phase II storm water regulations (discussed in greater detail in Section 4.1.4, Hydrology and Water Quality).

3.3.3.1 ISSUE 1 — CANDIDATE, SENSITIVE, OR SPECIAL-STATUS PLANT SPECIES

Biological Resources Issue 1 Summary

Would implementation of the Update to the 2018 LRDP result in a substantial adverse effect, either directly or through habitat modifications, on any plant species identified as a candidate, sensitive, or special-status species?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Survey sites with appropriate habitat type for sensitive plant (Bio-1A) and relocation of San Diego barrel cactus to preserved areas (Bio-1B).

Summary of Analysis in the 2018 LRDP EIR

Direct Impacts

Section 3.3.3.1 of the 2018 LRDP EIR determined that a potentially significant impact could occur to San Diego barrel cactus, a CRPR 2B.1 species, from implementation of the 2018 LRDP based on the 2016 observation of a single individual within the 2018 LRDP development area and the potential for additional individuals to establish within the development areas over the course of 2018 LRDP implementation. In addition, due to potential for additional sensitive species to move into development sites containing appropriate habitat over time, the 2018 LRDP EIR determined a potentially significant impact to sensitive plant species. Mitigation measures Bio-1A and Bio-1B were identified in the 2018 LRDP EIR to address, respectively, potential direct impacts to populations of sensitive plants on UC San Diego, in general, and to San Diego barrel cactus, specifically, and reduce those impacts to less than significant.

Indirect Impacts

Section 3.3.3.1 of the 2018 LRDP EIR determined that potential indirect impacts to San Diego barrel cactus and other sensitive plant species with a potential to occur on the UC San Diego La Jolla Campus could result from the implementation of the 2018 LRDP.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP would focus on redevelopment of existing developed lands, and a small area of impact to eucalyptus woodland within Urban Forest, neither of which provide suitable habitat for sensitive plant species. As stated in Section 3.3.1.2, above, areas of undeveloped Open Space Preserve would be redesignated for General Services, with proposed developments including a potential wastewater treatment plant and electrical substation. These Open Space Preserve areas contain eucalyptus woodland and Diegan coastal sage scrub that would be impacted under the Update. These areas have low potential for sensitive plant species, and mitigation measures require surveys of these areas, and any corresponding mitigation, prior to impacts. Thus, there are no proposed changes that require major revisions to the 2018 LRDP EIR or updated surveys, as explained in Section 3.3.1.1.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no changes with respect to circumstances under which the Update to the 2018 LRDP would be undertaken, and there is no new information of substantial importance that has become available relative to sensitive plant species. Thus, no substantial new impacts to sensitive plant species have been identified since the certification of the 2018 LRDP EIR.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact on plant species if it would result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Appendix G thresholds IV (d), (e), and (f) are addressed in Section 3.3.5 as there is no potential for a significant impact.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

Projects identified in the Update to the 2018 LRDP would be built out over the course of several years, through 2040, and projects proposed within undeveloped lands require project-specific updated rare plant surveys in accordance with mitigation measure Bio-1A. Given the detailed baseline data in the 2018 LRDP, the focus on redevelopment of previously developed sites and lack of additional impacts to sensitive habitats with the potential for sensitive plant species under the Update to the 2018 LRDP, the multiple year timeframe within which projects would occur, and the requirement for updated rare plant surveys during the planning and design phase of individual projects, updated rare plant surveys were not conducted for the Update to the 2018 LRDP. No new biological surveys were conducted for this SEIR; the analysis below relies on the 2018 BRTR (HELIX 2018) and the addendum to the BRTR prepared for the Update to the 2018 LRDP (HELIX 2025).

Impact Analysis

Direct Impacts

Implementation of the Update to the 2018 LRDP would not result in a new or more severe impact to candidate, sensitive, or special-status plant species, as the expansion of the proposed footprint of the development area into additional eucalyptus woodland habitat for the electrical substation and potential expansion into additional southern willow scrub, Diegan coastal sage scrub, and eucalyptus woodland habitats for the wastewater treatment plant would not substantially increase potential impacts to rare plant species given: (1) the low potential for rare plants in the eucalyptus woodland due to its allelopathic nature and ongoing disturbances by trail users and maintenance crews; (2) the low potential for a significant population of rare plants at the wastewater treatment plant location, which is located in an isolated area of habitat surrounded by development and which has been subject to past disturbances from grading associated with adjacent roadways; and (3) rare plant surveys conducted across the campus for the 2018 LRDP were negative in these areas. Impacts would remain potentially significant.

Redevelopment areas implemented under the Update to the 2018 LRDP would occur in existing developed lands and would therefore not have a significant impact on sensitive plant species as no potential habitat for sensitive plant species would be impacted.

Indirect Impacts

As stated above, implementation of the Update to the 2018 LRDP would not result in a new or more severe impact to candidate, sensitive, or special-status plant species, as the proposed footprint of the development area is not expanding into additional habitat types under the Update to the 2018 LRDP.

Level of Significance Before Mitigation

As described above, impacts would be potentially significant, consistent with the conclusion in the 2018 LRDP EIR. Therefore, the following mitigation measures would be implemented.

Mitigation Measures

Applicable measure from the 2018 LRDP EIR:

Bio-1B **Barrel Cactus.** If additional barrel cactus are observed during updated sensitive plant surveys conducted under mitigation measure Bio-1A, mitigation for impacts to San Diego barrel cactus shall occur through preservation of habitat on UC San Diego that supports this species and salvage and translocation of any impacted San Diego barrel cactus within the project site(s) to appropriate locations within the Ecological Reserve.

Revised mitigation measure for the Update to the 2018 LRDP:

Measure Bio-1A from the 2018 LRDP EIR has been modified below (as shown in strikeout/underlined text) to provide clearer language for survey requirements and reducing impacts to rare plants, and to broaden the mitigation options for rare plants to allow more flexibility for differing species and project situations. The proposed revisions are not associated

with a new impact under the Update to the 2018 LRDP. Translocation and restoration of sensitive plants have been added to the measure as additional options for plant species mitigation. Translocation and habitat restoration can significantly reduce mortality and adverse impacts to sensitive plant species by relocating individuals from impacted areas to suitable habitat and restoring habitat to higher quality conditions, increasing chances of survival and reproduction.

Bio-1A **Sensitive Plant Surveys**. During the project planning phase, updated sensitive plant surveys shall be conducted for all project sites that would impact undeveloped land ~~support potential habitat for sensitive plant species~~ and have not been surveyed within the preceding year. Sensitive plant surveys shall be conducted by a qualified biologist retained by UC San Diego during the appropriate season for detecting the species as part of the project design phase. Surveys will be floristic in nature and include lists of all plants identified in the survey area. Surveys will be conducted on foot, employing a level of effort sufficient to provide comprehensive coverage. The locations and prevalence (estimated total numbers/percent cover, as applicable) of sensitive plants will be recorded. If site-specific surveys are not required because a survey was conducted less than one year ago, impact assessment and minimization/mitigation requirements shall be based on the most recent available survey and shall also include an analysis of the potential for sensitive plant species to occur on the site based on existing site conditions. If sensitive plant species are observed, they shall be avoided by reducing or revising the impact boundary if feasible, particularly for temporary impact areas. If impacts cannot be avoided, the impacts to those species must be evaluated, and any significant impacts shall be mitigated through one or a combination of the following: conservation of habitat that supports the impacted species, translocation of impacted individuals to conserved lands, and/or habitat restoration that incorporates the impacted species in the plant/seed palette. Habitat mitigation shall occur in accordance with mitigation measure Bio-3C.

Level of Significance After Mitigation

Implementation of mitigation measures Bio-1A and Bio-1B would reduce impacts to a level that is less than significant, similar to the conclusion in the 2018 LRDP EIR.

3.3.3.2 ISSUE 2 — CANDIDATE, SENSITIVE OR SPECIAL-STATUS ANIMAL SPECIES

Biological Resources Issue 2 Summary

Would implementation of the Update to the 2018 LRDP result in a substantial adverse effect, either directly or through habitat modifications, on any animal species identified as a candidate, sensitive, or special-status species by the CDFW or USFWS?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Surveys for coastal California gnatcatcher and least Bell's vireo, construction noise attenuation, occupied habitat avoidance and agency consultation (Bio-2A, 2B, and 2C); avian nest surveys and avoidance (Bio-2D and 2E); surveys for monarch butterfly and Crotch's bumble bee (Bio-2F and 2G); and bird-safe building standards (Bio-2H).

Summary of Analysis in the 2018 LRDP EIR

Direct Impacts

Section 3.3.3.2 of the 2018 LRDP EIR determined that a potentially significant impact could occur to sensitive animal species from implementation of the 2018 LRDP, including federally listed species (coastal California gnatcatcher), state fully protected species (American peregrine falcon), and state species of special concern (two-striped garter snake, yellow warbler, yellow-breasted chat, and San Diego black-tailed jackrabbit). Mitigation measures Bio-2A through Bio-2E were identified in the 2018 LRDP EIR to address potential impacts to populations of sensitive animals and reduce those impacts to less than significant.

Federally Listed Species

Section 3.3.3.2 of the 2018 LRDP EIR identified coastal California gnatcatcher as the only federally listed species to occur on UC San Diego. Implementation of the 2018 LRDP could directly impact coastal sage scrub habitat adjacent and connected to coastal California gnatcatcher-occupied

habitat within SIO Canyon (on the SIO portion of campus). Although least Bell's vireo are considered absent from UC San Diego, the impact analysis assumed the species could establish itself on campus at a later date, resulting in the potential for significant impacts.

Construction noise could be significant if it occurs during the coastal California gnatcatcher breeding season (generally February 15th through August 31st) and/or least Bell's vireo breeding season (generally March 15th through September 15th) and individuals are present within 500 feet of the construction activity. In such cases, noise levels that meet or exceed 60 A-weighted decibels (dBA) hourly equivalent continuous sound level (L_{EQ}), or the existing ambient noise level if it already exceeds 60 dBA hourly L_{EQ}, in occupied habitat would be significant. However, except for potential construction noise impacts, indirect impacts to coastal California gnatcatcher and least Bell's vireo were considered less than significant because they were not anticipated to substantially affect these species.

Fully Protected Species

Section 3.3.3.2 of the 2018 LRDP EIR concluded that potential impacts to the American peregrine falcon were anticipated to be less than significant because there would be no impacts to their nesting, foraging, or wintering areas, which are located along the coastal bluff, beach areas, and out over the Pacific Ocean. Since the 2018 LRDP development areas were not within this area, no impacts were anticipated. Therefore, no impacts were identified in 2018 EIR.

State Species of Special Concern

Section 3.3.3.2 of the 2018 LRDP EIR concluded that the potential direct and indirect impacts from the proposed 2018 LRDP for two-striped garter snake, yellow warbler, yellow-breasted chat, and San Diego black-tailed jackrabbit are considered potentially adverse but less than significant. This is because large portions of habitat have been preserved on UC San Diego within the Ecological Reserve, providing ample habitat for these species.

Nesting Birds

Section 3.3.3.2 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP has the potential to impact nesting birds (including raptors) through direct removal of nesting habitat and through indirect disturbance to nesting birds from construction during the breeding season. Impacts to nesting birds protected under the MBTA and CFG Code would be considered significant; therefore, direct or indirect disturbance to active bird nests were considered a significant impact. If project construction occurs during the avian breeding season (varies greatly depending upon the species, but generally February 15 through August 31), potentially significant impacts would occur. Mitigation measure Bio-2D was identified in the 2018 LRDP EIR to address potential impacts to nesting birds and reduce those impacts to less than significant.

Other Sensitive Species

Section 3.3.3.2 of the 2018 LRDP EIR determined that implementation of the 2018 LRDP could potentially impact overwintering populations of monarch butterflies; these impacts were determined to be less than significant since known on-campus overwintering sites were not within potential development areas identified for the 2018 LRDP impact analysis.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP but would result in: (1) a potential increase to coastal sage scrub impacts over the amount identified in the 2018 LRDP; and (2) would add a redevelopment area adjacent to the Ecological Reserve, which supports sensitive animal species. There are no proposed changes that require major revisions to the 2018 LRDP EIR or updated surveys, as explained in Section 3.3.1.1.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

The 2018 LRDP did not address the potential for impacts to Hermes copper butterfly or Crotch's bumble bee (described in Section 3.3.1.4 above), and, while the monarch butterfly was discussed in Section 3.3.1.5 the 2018 LRDP EIR, it did not have special status at that time. As such, these three species are addressed in this SEIR.

Additionally, the 2018 LRDP did not include bird strikes as a potential impact to avian species, which is also addressed herein.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact on animal species if it would result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Habitat modifications are discussed in detail in the context of the sensitive vegetation communities analysis under Issue 3 of this section.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

As explained in Section 3.3.1.1, no new biological surveys were conducted for this SEIR; the analysis below relies on the 2018 BRTR (HELIX 2018) and the addendum to the BRTR prepared for the Update to the 2018 LRDP (HELIX 2025). This section is updated to address bird-safe building standards and species that were designated as sensitive after the 2018 LRDP EIR was approved.

Impact Analysis

Direct Impacts

Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP, but would result in: (1) a potential increase to southern willow scrub impacts over the amount identified in the 2018 LRDP, (2) a potential increase to coastal sage scrub impacts over the amount identified in the 2018 LRDP;

and (3) impacts to eucalyptus woodland, which has potential to be used as monarch butterfly overwintering habit, and (4) would add a redevelopment area adjacent to the Ecological Reserve.

Increased impacts to southern willow scrub, coastal sage scrub, and eucalyptus woodland would occur from construction of the proposed water treatment plant in Restoration Lands north of La Jolla Village Drive and east of Gilman Drive. While sensitive animal species have not been documented in this area, which is small, isolated from other habitat areas, and surrounded by campus development and roads, there is potentially suitable habitat for sensitive species, including monarch butterfly, Crotch's bumble bee, coastal California gnatcatcher, yellow warbler, yellow-breasted chat, Cooper's hawk, orange-throated whiptail, and least Bell's vireo.

The Update to the 2018 LRDP includes additional redevelopment of existing urbanized areas on campus, one potential redevelopment area (Warren College Housing) is adjacent to Ecological Reserve within West Campus. The Update would not result in direct impacts to the University's Ecological Reserve, but could result in indirect impacts to sensitive animal species, including those previously documented in this portion of the Reserve per the 2018 LRDP (coastal California gnatcatcher, yellow-breasted chat, and orange-throated whiptail), resulting from edge effects such as construction noise, temporary and permanent lighting, unauthorized access, and unauthorized impacts.

Redesignation of Urban Forest from Open Space Preserve to General Services for the proposed electrical substation near Hopkins Drive would result in a less than significant impact to biological resources, as (1) the land does not contain sensitive habitats, (2) impacts to eucalyptus woodland that could support overwintering monarch butterfly would be mitigated through implementation of MM Bio-2G, and (3) the University would add an equal acreage of land to the Open Space Preserve elsewhere on campus, resulting in no net loss of campus Open Space Preserve areas. Thus, implementation of the Update would not result in a new or more severe impact to habitat for special-status animal species previously discussed in the 2018 LRDP.

Redesignation of Restoration Lands from Open Space Preserve to General Services for the potential wastewater treatment plant near La Jolla Village Drive would result in a less than significant impact to biological resources, as (1) potential impacts to monarch butterfly, Crotch's bumble bee, coastal California gnatcatcher, yellow warbler, yellow-breasted chat, Cooper's hawk, orange-throated whiptail, and least Bell's vireo would be addressed through implementation of mitigation measures Bio-2A, Bio-2B, Bio-2C, Bio-2D, Bio-2E, Bio-2F, and Bio-2G, and (2) the University would add an equal acreage of land to the Open Space Preserve elsewhere on campus, resulting in no net loss of campus Open Space Preserve areas.

The 2018 LRDP did not address the potential for impacts to species that were designated sensitive after the preparation of the 2018 LRDP EIR, including Hermes copper butterfly, Crotch's bumble bee, and the monarch butterfly. As such, potential impacts to these three species are addressed below. Additionally, the 2018 LRDP did not include bird strikes as a potential impact to avian species, which is also addressed herein.

Federally Listed Species

Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP and would, therefore, not result in a new or more severe impact to habitat for federally listed species previously discussed in the 2018 LRDP.

Hermes copper butterfly is a federally threatened species and, therefore, is afforded protection under the FESA. Hermes copper is typically found in coastal sage scrub and southern mixed chaparral habitats where mature specimens of its larval host plant, spiny redberry (*Rhamnus crocea*), are present. The campus supports potentially suitable habitat for Hermes copper; however, this species is not expected to occur given the current known range of the species in San Diego County, and the only suitable habitat on campus for this species is conserved within the Ecological Reserve (i.e., areas where no impacts are proposed) (HELIX 2025). Further, the campus is within the area designated by the USFWS as exempt from "take" prohibitions for Hermes copper, and, pursuant to the USFWS, lands within this area do not require surveys or mitigation for this species. As the campus is located outside of the USFWS survey area for this species and the only suitable habitat is conserved in the Ecological Reserve, focused surveys for this species were not conducted. No significant impact would occur since no habitat impact would occur.

Monarch butterfly is a federal candidate species for listing under the FESA. Overwintering monarchs have been documented in eucalyptus groves on campus, and while the reported observed populations of overwintering monarchs reported on campus each year between 2016 and 2023 have been fewer than 20 individuals, the groves retain the potential to provide overwintering habitat for this species.

The Update to the 2018 LRDP includes potential development of an electrical substation within an undeveloped site designated as Urban Forest. The electrical substation is proposed at the northeast corner of Genesee Avenue and Hopkins Drive in a location where the Urban Forest is bounded by development on two sides. While monarch butterflies have not been documented overwintering in this location, suitable overwintering habitat is present. Other projects included in the Update to the 2018 LRDP may also encroach into eucalyptus woodland habitats that have potential to support overwintering monarch butterflies (Figures 3.3-1 and 3.3-2). Impacts to the habitat alone, if not being utilized by the species, would not have the potential to result in substantial adverse effects; however, if proposed projects result in direct impacts to overwintering monarchs or trees supporting overwintering monarchs, those impacts would be considered significant.

Fully Protected Species

Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP and would, therefore, not result in a new or more severe impact to habitat for fully protected species previously discussed in the 2018 LRDP. Impacts would remain unchanged from the 2018 LRDP EIR and would be potentially significant.

State Species of Special Concern

Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP and would, therefore, not result in a new or more severe impact to habitat for state species of special concern previously discussed in the 2018 LRDP.

Crotch's bumble bee is currently listed as a state candidate endangered species and, therefore, is afforded protection under CESA. The campus supports potentially suitable shrublands, chaparral, and open grasslands that could be used by this species. Projects included in the Update to the 2018 LRDP SEIR would impact Diegan coastal sage scrub and non-native grassland habitats, which have potential to support Crotch's bumblebee. Habitat assessments and associated presence/absence

surveys for this species at the project-level would be conducted, and if the species is present, impacts to habitat supporting this species would be considered significant.

Nesting Birds

Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP EIR, but would result in: (1) a potential increase to southern willow scrub impacts over the amount identified in the 2018 LRDP, and (2) a potential increase to coastal sage scrub impacts over the amount identified in the 2018 LRDP. Other redevelopment on campus could result in removal of large trees that could support bird and raptor nesting habitat. Impacts would remain unchanged from the 2018 LRDP EIR and would be potentially significant.

Other Sensitive Species

As stated previously, the monarch butterfly is now a federal candidate species for listing under the FESA and potential impacts are described above.

The 2018 LRDP EIR did not discuss bird mortality due to bird collisions. Continued urbanization of the campus has the potential to increase bird strikes on buildings, resulting in a potentially significant impact to avian species, including those identified as candidate, sensitive, or special status.

Level of Significance Before Mitigation

As described above, impacts would be potentially significant, consistent with the conclusions in the 2018 LRDP EIR. Therefore, the following mitigation measures would be implemented.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Bio-2C **Least Bell's Vireo Surveys.** During the project planning process, when a project is proposed that shall directly or indirectly impact least Bell's vireo-suitable habitat (southern willow scrub and mule fat scrub), surveys to determine presence or absence of the species shall be required. If occupied least Bell's vireo habitat could be directly or indirectly impacted by a project, it shall be avoided to the maximum extent feasible. If impacts cannot be avoided, UC San Diego shall contact USFWS and CDFW to discuss project permitting options and the following requirements shall apply:

i. Occupied least Bell's vireo habitat will not be removed during the vireo breeding season (March 15 through September 15). If vireos are not present, then only mitigation for the habitat loss shall be required as described in mitigation measure Bio-3E.

ii. If construction activities commence during the least Bell's vireo breeding season (March 15 through September 15) and least Bell's vireo are found within 500 feet of the grading limits based on the survey to determine presence/ absence described above, a qualified acoustician shall be consulted to identify

appropriate measures for reducing construction noise levels to 60 dBA hourly L_{EQ} or ambient, whichever is higher, during the part of the breeding season when active nests are most likely. If noise reduction measures are determined necessary, the construction contractor shall implement the measures and the acoustician shall confirm, through field measurements, that the attenuation measures are effective at maintaining noise at or below the specified threshold.

iii. Impacts to wetland habitats (regardless of least Bell's vireo occupancy) shall be mitigated at a 3:1 ratio through one or more of the following: creation, restoration, enhancement, and/or preservation of habitat in the Ecological Reserve, or through purchase of credits at an approved wetland mitigation bank, as described under mitigation measure Bio-3D.

Bio-2D **Raptor Nest Avoidance**. If project construction is scheduled to commence during the raptor nesting season (generally January 15 through July 31), pre-construction surveys for raptor nests shall be performed by a qualified biologist within 500 feet of project construction activities no more than seven days prior to the initiation of construction. Construction activities within 500 feet of an identified active raptor nest shall not commence during the breeding season until a qualified biologist determines that the nest is no longer active and any young birds in the area have adequately fledged and are no longer reliant on the nest. Trees with inactive nests can be removed outside the breeding season without causing an impact.

Bio-2E **General Avian Nest Avoidance.** No grubbing, trimming, or clearing of vegetation (including brush management) from project sites shall occur during the general avian breeding season (February 15 through August 31). If grubbing, trimming, or clearing cannot feasibly occur outside of the general avian breeding season, a qualified biologist shall perform a pre-construction nesting bird survey no more than seven days prior to the commencement of vegetation clearing or grubbing to determine if active bird nests are present in the affected areas. Should an active migratory bird nest be located, the project biologist shall direct vegetation clearing away from the nest until it has been determined by the project biologist that the young have fledged, or the nest has failed. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within the survey area, clearing, grubbing, and grading shall be allowed to proceed.

Revised mitigation measures for the Update to the 2018 LRDP:

Minor refinements have been made to mitigation measures Bio-2A and Bio-2B regarding mitigation for permanent impacts to Diegan coastal sage scrub (changes shown in strikeout/underline text). Mitigation measures Bio-2A and Bio-2B were modified to clarify that the 2:1 habitat mitigation applies specifically to permanent impacts, as temporary impacts are mitigated in-place at 1:1 per the new mitigation measure Bio-3N. These revisions were made to clarify potential ambiguities between mitigation measures. These measures were also modified to include off-campus habitat acquisition or purchase of conservation bank credits as mitigation options for permanent impacts to Diegan coastal sage scrub, to provide consistency with mitigation measure Bio-3C.

Bio-2A **Coastal California Gnatcatcher Surveys.** During the project planning process, a project site shall be reviewed to determine if it would directly impact Diegan coastal sage scrub or indirectly impact the coastal California gnatcatcher by being located

within 500 feet of Diegan coastal sage scrub based on a review of SEIR Figures 3.3-1 through 3.3-3 or updated vegetation mapping. If the potential for impacts exists, three surveys shall be conducted seven to 10 days apart in accordance with the current USFWS protocol for NCCP-enrolled agencies to determine presence/absence of the species. Surveys may be conducted either on a project-specific basis, or on a programmatic level in portions of UC San Diego likely to be subject to disturbance in the relatively near future. The permittee must submit a 15-day pre-survey notification to the USFWS Carlsbad Permits Division, including an explanation that three surveys shall be conducted and specifying that UC San Diego shall mitigate all permanent impacts to Diegan coastal sage scrub at a 2:1 ratio through on-site preservation, creation, and/or enhancement, or combination thereof, in the Ecological Reserve or off-campus through habitat acquisition and preservation or the purchase of credits from an approved conservation bank, regardless of whether the impacted area is occupied by coastal California gnatcatcher. Documentation of the survey results shall be provided to USFWS in accordance with current protocol survey guidelines.

Bio-2B **Coastal California Gnatcatcher-Occupied Habitat Avoidance**. If Diegan coastal sage scrub habitat within a project site is determined to be occupied by coastal California gnatcatcher based on surveys conducted in accordance with mitigation measure Bio-2A, UC San Diego shall contact USFWS to discuss project permitting options, which could be accomplished through Section 7 or Section 10(a) of the FESA. Impacts to the coastal California gnatcatcher and gnatcatcher-occupied habitat shall be avoided/mitigated by the following measures (additional measures may be required as a result of the consultation/permitting process):

i. Diegan coastal sage scrub occupied by coastal California gnatcatcher shall not be removed during the coastal California gnatcatcher breeding season (February 15 through August 31). If coastal California gnatcatchers are not present, then only mitigation for the habitat loss shall be required as described in mitigation measure Bio-3C and habitat clearing can occur at any time of the year following the survey.

ii. If construction activities commence during the coastal California gnatcatcher breeding season (February 15 through August 31) and coastal California gnatcatchers are found within 500 feet of the grading limits based on the surveys required in mitigation measure Bio-2A, a qualified acoustician shall be consulted to identify appropriate measures for reducing construction noise levels to 60 dBA hourly L_{EQ} or ambient, whichever is higher, during the part of the breeding season when active nests are most likely. If noise reduction measures are determined necessary, the construction contractor shall implement the measures and the acoustician shall confirm, through field measurements, that the attenuation measures are effective at maintaining noise at or below the specified threshold.

iii. Permanent impacts to Diegan coastal sage scrub (regardless of coastal California gnatcatcher occupancy) shall be mitigated at a 2:1 ratio through preservation, creation, and/or enhancement, or combination thereof, of coastal sage scrub ~~by preserving areas~~ in the Ecological Reserve or off-campus through habitat

acquisition and preservation or the purchase of credits from an approved conservation bank, as described in mitigation measure Bio-3C.

New mitigation measures for the Update to the 2018 LRDP:

Mitigation measures Bio-2F, Bio-2G, and Bio-2H have been added to address impacts to Crotch's bumble bee, monarch butterfly, and bird-safe building standards.

Mitigation measure Bio-2F was added to address potential impacts to Crotch's bumble bee from implementation of the Update to the 2018 LRDP. Crotch's bumble bee is a special-status species that was added as a state candidate for listing under the CESA since the 2018 LRDP EIR. The campus supports potentially suitable habitats that could be used by this species.

Mitigation measure Bio-2G was added to address potential impacts to monarch butterfly from implementation of the Update to the 2018 LRDP. Monarch butterfly is a special-status species that was added as a federal candidate for listing under the FESA since the 2018 LRDP EIR. The campus supports potentially suitable overwintering habitat that could be used by this species.

Mitigation measure Bio-2H was added to address potential impacts to avian species, including those identified as candidate, sensitive, or special status, from continued urbanization of the campus under the Update to the 2018 LRDP, resulting in a potentially significant impact from bird strikes on buildings.

Bio-2F **Crotch's Bumble Bee Surveys.** A qualified biologist shall conduct a habitat assessment to determine if potentially suitable habitat for Crotch's bumble bee (i.e., native scrub habitats and native and non-native grassland habitats containing nectar resources) occur within the project footprint. If potentially suitable habitat is present, the following measures shall be implemented to reduce potential impacts to this species:

1. Focused Survey: During project planning and before the commencement of construction activities (i.e., demolition, earthwork, clearing, and grubbing), Crotch's bumble bee focused surveys shall be conducted. A qualified biologist familiar with Crotch's bumble bee identification and life history shall conduct three visual surveys at least seven days apart during the colony's active period (April through August [CDFW 2023]). If standardized survey protocols are published before surveys are completed, surveys shall either follow these protocols or modified protocols approved by CDFW. If focused surveys are negative, no further assessment shall be required, and construction activities shall be allowed to proceed without any further requirements.

If Crotch's bumble bee is detected during focused surveys, the measures below shall be implemented.

2. CESA Compliance: Before the start of construction, required consultation with CDFW regarding the project's effects on Crotch's bumble bee must occur. If take of Crotch's bumble bee is expected, an incidental take permit issued by the CDFW must be obtained, as applicable. In addition, if an incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any inconsistent measures provided in the LRDP. CESA compliance

shall only be required if Crotch's bumble bee remains a candidate state endangered species or is listed as a state endangered species at the time of project construction. If Crotch's bumble bee is delisted, this measure shall not be required.

3. Compensatory Mitigation: Compensatory mitigation for permanent direct impacts to Crotch's bumble bee habitat shall be offset through one or a combination of the following: preservation of habitat, habitat creation, and/or enhancement on the UC San Diego campus, or off-campus through habitat acquisition and preservation or purchase of suitable habitat credits from an approved conservation bank pursuant to Bio-3C. Compensatory mitigation sites occurring on campus shall be monitored and maintained per the campus-wide Habitat Management Plan. Compensatory mitigation sites occurring off campus shall be monitored and maintained according to a site-specific long-term management plan. If an incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any measures and mitigation ratios provided in the LRDP.

Bio-2G **Monarch Butterfly Surveys.** For any project construction activities in the Historic Grove or Urban Forest between October 1st and March 15th, including vegetation removal, a qualified biologist familiar with monarch butterfly identification and life history shall conduct biological surveys to determine the presence of overwintering monarch butterflies in trees in the project site and within 100 -feet of the project site. The initial survey must occur at least 14 days before the commencement of any construction activities, and a follow-up survey must be conducted within three calendar days before the initiation of vegetation clearance or construction, whichever is earlier. Surveys must continue on a monthly basis throughout the overwintering season or until the project is completed, whichever comes first. If overwintering monarchs are found within 100 feet of the project, a qualified biologist shall monitor project activities to ensure that trees with overwintering monarchs are protected and are not removed, trimmed, or otherwise damaged by construction activities. If recommended by the biologist, temporary avoidance measures shall be implemented that may include, but are not limited to, setbacks from active overwintering trees and stopping work until observed monarch individual(s) have left, as determined by the biologist through surveys. If the monarch butterfly becomes a listed species under the federal Endangered Species Act, coordination with U.S. Fish and Wildlife Service (USFWS) would be required if potential impacts to this species are proposed.

Bio-2H **Bird-Safe Building Standards.** Project design plans for proposed development on campus shall comply with bird-safe building standards for façade treatments, landscaping, lighting, and building interiors, as follows:

i. For glass treatments up to the third floor (approximately 36 feet) or to the height of adjacent vegetation (whichever is taller), the amount of untreated glass shall be less than 35 percent of the building façade.

   a. The percentage shall be calculated by dividing the square footage of glass by the building façade area, where the building façade area is the width of the façade times the height to the third floor or adjacent vegetation.

ii. For glass treatments up to the third floor (approximately 36 feet) or to the height of adjacent vegetation (whichever is taller), that do not meet requirement (A) above, glass shall be treated to create visual barriers for birds. Acceptable glazing treatments include fritting; netting; permanent stencils; frosted, non-reflective or angled glass; exterior screens; decorative latticework or grills; physical grids placed on the exterior of glazing; ultraviolet patterns visible to birds; and window awnings, shades, or shutters; or similar treatments.

    a. Where applicable, vertical elements within the treatment pattern should be at least one quarter (1/4) inch wide, at a maximum spacing of four inches;

    b. Where applicable, horizontal elements within the treatment pattern should be at least one eighth (1/8) inch wide, at a maximum spacing of two inches; and

    c. Non-reflective glazing shall have a "Reflectivity Out" coefficient of thirty percent or less. That is, the fraction of radiant energy that is reflected from glass or glazed surfaces shall not exceed 30 percent.

iii. Building and site design shall eliminate or reduce high-threat features, such as enclosed glass walkways, glass railings, glass/transparent corners, fly-through conditions (i.e., where birds have a clear line of sight to sky or vegetation on the other side of the glass), "bird traps" (e.g., glass/windowed courtyards, interior atriums, windows installed opposite each other), and similar features.

iv. Trees and other vegetation shall be sited to avoid or obscure reflection on building facades such as, for example, not siting vegetation directly adjacent to reflective surfaces, and to avoid creating an effect where landscaping funnels birds toward glass (e.g., walkways, passageways, edges).

v. Buildings shall be designed to minimize light spillage and maximize light shielding to the maximum feasible extent per the following standards:

    a. Nighttime lighting shall be minimized to levels necessary to provide pedestrian security.

    b. Building lighting shall be shielded and directed downward.

    c. Up-lighting and use of event "searchlights" or spotlights are prohibited.

    d. Landscape lighting shall be limited to low-intensity and low-wattage lights.

    e. Red lights shall be limited to only those necessary for security and safety warning purposes.

    f. Artificial nighttime light from interior lighting shall be minimized through the utilization of automated on/off systems and motion detectors.

Level of Significance After Mitigation

Implementation of mitigation measures Bio-2A through Bio-2E would reduce impacts to biological resources to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

The addition of mitigation measure Bio-2F will reduce potential impacts on Crotch's bumble bee to less than significant. The addition of mitigation measure Bio-2G will reduce potential impacts on monarch butterfly to less than significant. The incorporation of bird-safe building standards as mitigation measure Bio-2H will reduce potential bird strike impacts to less than significant.

3.3.3.3 ISSUE 3 — RIPARIAN HABITAT AND OTHER SENSITIVE NATURAL COMMUNITIES

Biological Resources Issue 3 Summary

Would implementation of the Update to the 2018 LRDP have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Sensitive habitat mapping (Bio-3A); avoidance (Bio-3B); compensatory mitigation for impacted upland and wetland communities (Bio-3C and Bio-3D); measures to reduce indirect construction impacts (Bio-3E and Bio-3F); measures to reduce operational indirect impacts (Bio-3G through Bio-3M); and mitigation for temporary impacts (Bio-3N).

Summary of Analysis in the 2018 LRDP EIR

Temporary Impacts

Section 3.3.3.3 of the 2018 LRDP EIR determined that construction activities could cause temporary impacts such as fugitive dust, noise, nighttime lighting, inadvertent encroachment, and wildfire risk which could impact riparian habitat and other sensitive natural communities. Potentially significant impacts could occur, and mitigation would be required. Mitigation measures Bio-3E and Bio-3F were identified in the 2018 LRDP EIR to address potential temporary construction impacts to sensitive natural communities and reduce those impacts to less than significant.

Permanent Impacts

Section 3.3.3.3 of the 2018 LRDP EIR determined that permanent impacts may result to riparian habitat or other sensitive natural communities if future project sites contain sensitive vegetation communities. Mitigation measures Bio-3A through Bio-3D and Bio-3G through Bio-3M were identified in the 2018 LRDP EIR to address potential permanent impacts to sensitive natural communities and reduce those impacts to less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP would focus on redevelopment of existing developed lands and would not result in an increase in disturbance to riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no changes with respect to circumstances under which the Update to the 2018 LRDP would be undertaken, and there is no new information of substantial importance that has become available relative to riparian habitat and other sensitive natural communities identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

For the purposes of this analysis, UC San Diego will use the following standard for determining if there would be a new or substantially more severe significant impact to riparian and other sensitive habitats for projects implemented under the Update to the 2018 LRDP. Individual projects may have a less than significant finding for impacts to sensitive upland vegetation communities based on a limited affected area and minimal habitat value. Factors that may contribute to a determination of minimal habitat value include small size, isolation from other habitats, lack of sensitive species, dominance of non-native plant species, and marginal/degraded habitat quality. These determinations would be made on a project-specific basis. Impacts from investigative

activities such as geotechnical borings may be less than significant based on the above factors or may qualify for a CEQA exemption.

Assumptions and Methodology

As explained in Section 3.3.1.1, no new biological surveys were conducted for this SEIR; the analysis below relies on the 2018 BRTR (HELIX 2018) and the addendum to the BRTR prepared for the Update to the 2018 LRDP (HELIX 2025).

Impact Analysis

Temporary Impacts

Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously analyzed in the 2018 LRDP but would result in: (1) a potential increase to southern willow scrub impacts over the amount identified in the 2018 LRDP; (2) a potential increase to coastal sage scrub impacts over the amount identified in the 2018 LRDP; and (3) would add a redevelopment area adjacent to the Ecological Reserve, which supports sensitive habitat types. The Update to the 2018 LRDP includes additional redevelopment of existing urbanized areas on campus, of which one area (Warren College Housing) is adjacent to the Ecological Reserve in North Canyon within West Campus. This project could result in indirect impacts to the Ecological Reserve from issues such as unauthorized access, non-native plant species, and irrigation runoff. Temporary impacts to habitat would be restored upon completion of construction. However, because specific project details are not currently known, impacts to sensitive natural communities would be considered potentially significant.

Permanent Impacts

Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously analyzed in the 2018 LRDP but would result in: (1) a potential increase to southern willow scrub impacts over the amount identified in the 2018 LRDP; (2) a potential increase to coastal sage scrub impacts over the amount identified in the 2018 LRDP; and (3) would add a redevelopment area adjacent to the Ecological Reserve.

Potential impacts to vegetation communities that may occur under the Update to the 2018 LRDP are provided below in Table 3.3-1, *Impacts to Vegetation Communities Under the Update to the 2018 LRDP*. This table corresponds to Figures 3.3-1, 3.3-2, and 3.3-3, included herein. As discussed earlier, potential areas of redevelopment are identified on sites where existing structure(s) would be demolished, and a new structure(s) would be constructed in its place. Potential new development areas are identified on limited sites that are not currently developed or where a new structure could be constructed where one currently does not exist, such as an existing parking lot. Areas shown as new development in undeveloped lands in SIO on Figure 3.3-1 are areas that were previously analyzed in the 2018 LRDP. The potential wastewater treatment plant and electrical substation are the only new development areas in undeveloped land that were not previously analyzed under the 2018 LRDP.

Table 3.3-1
Impacts to Vegetation Communities Under the Update to the 2018 LRDP

Vegetation Community[1]	New Development[1]	Redevelopment[1]	TOTAL[2]
Wetlands			
Southern Willow Scrub	0.10	--	0.10
Mule Fat Scrub (including disturbed)	--	--	--
Herbaceous Wetland	--	--	--
Disturbed Wetland (Arundo-dominated)	--	--	--
Subtotal Wetlands	**0.10**	**--**	**0.10**
Sensitive Uplands			
Beach	--	--	--
Native Grassland	--	--	--
Maritime Succulent Scrub	--	--	--
Southern Maritime Chaparral	--	--	--
Southern Coastal Bluff Scrub	--	--	--
Diegan Coastal Sage Scrub (including disturbed)	2.0[3]	--	2.0
Southern Mixed Chaparral	--	--	--
Chaparral/Eucalyptus Woodland Ecotone	--	--	--
Non-native Grassland	1.9	--	1.9
Subtotal Sensitive Uplands	**3.9**	**--**	**3.9**
Non-sensitive Uplands			
Eucalyptus Woodland	9.5[4]	--	9.5
Disturbed Habitat	1.3	--	1.3
Urban/Developed Land	64.0	112.8	176.8
Subtotal Non-sensitive Uplands	**74.8**	**112.8**	**187.6**
Total[2]	**78.8**	**112.8**	**191.6**

Source: HELIX 2025

1 Presented in acres rounded to the nearest hundredth for wetlands and the nearest tenth for uplands.

2 Totals reflect rounding.

3 Includes 0.4 acre of impact from the potential wastewater treatment plant that was not previously identified in the 2018 LRDP EIR development areas and 1.6 acres that were previously identified in proposed development areas under the 2018 LRDP EIR.

4 Includes 4.3 acres of combined impacts from the wastewater treatment plant and the potential electrical substation that were not previously identified in the 2018 LRDP EIR development areas and 5.2 acres that were previously identified in proposed development areas under the 2018 LRDP EIR.

The increased impacts to southern willow scrub and coastal sage scrub would occur from construction of the potential wastewater treatment plant north of La Jolla Village Drive and east of Gilman Drive and would impact approximately 0.4 acre of sage scrub and approximately 0.10 acre of southern willow scrub.

Redevelopment areas implemented under the Update to the 2018 LRDP would occur in existing developed lands and would therefore not directly impact sensitive vegetation communities. However, the Update includes addition of a redevelopment area adjacent to the Ecological Reserve on West Campus, which supports sensitive vegetation communities which could be subject to significant indirect effects, discussed below.

The Update to the 2018 LRDP would not result in direct impacts to the University's Ecological Reserve, as no development areas are proposed within the Reserve. The Update to the 2018 LRDP includes redevelopment of existing urbanized areas on campus, of which the West Campus Housing

project (WC10) is adjacent to the Ecological Reserve within West Campus. This project, which would be within existing developed lands, could result in indirect impacts to the Ecological Reserve from potential edge effects such as unauthorized access, spread of non-native plant species into the Reserve, and irrigation runoff from project landscaping going into the Reserve.

Redesignation of Urban Forest from Open Space Preserve to General Services for the proposed electrical substation near Hopkins Drive would not result in a significant impact to biological resources, as the land does not contain sensitive habitats, and the University would add an equal acreage of land to the Open Space Preserve elsewhere on campus, resulting in no net loss of campus Open Space Preserve areas. Implementation of the Update to the 2018 LRDP would not result in a new or more severe permanent impact to riparian habitat or other sensitive natural communities. However, because specific project details are not currently known, impacts to sensitive natural communities would be considered potentially significant.

Level of Significance Before Mitigation

As described above, impacts to riparian habitat or sensitive natural communities would be potentially significant, consistent with the conclusion in the 2018 LRDP EIR. Therefore, the following mitigation measures would be implemented

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Bio-3B **Site Design.** During the project planning phase, site plans shall be designed to minimize impacts to sensitive vegetation communities, to the extent feasible. Such minimization efforts include the following:

i. Use of retaining walls to minimize grading impacts, to the extent that this is possible from an engineering and visual impact standpoint.

ii. Locations, widths, design features, and construction methods of any new trails or overlook areas shall carefully consider how to avoid and minimize impacts to sensitive vegetation communities (e.g., routing trails along canyon rims rather than through canyons, cantilevered overlook platforms, using bridges to avoid wetland vegetation communities, clearing trails by hand).

iii. To the extent practicable, a 50-foot wide buffer shall be provided between permanent development and wetland vegetation.

Bio-3E **Pre-construction Meeting.** Prior to construction, a pre-construction meeting shall be held between the Project Manager, qualified biologist, Environmental Planner, and construction crews to ensure crews are informed of the sensitivity of habitats in the Open Space Preserve and adjacent undeveloped lands.

i. Prior to commencement of clearing or grading activities, fencing (e.g., silt fencing, orange construction fencing, and/or chain-link fencing as determined by campus planning) shall be installed around the approved limits of disturbance to prevent errant disturbance of sensitive biological resources by

construction vehicles or personnel. Installation of fencing to demarcate the approved limits of disturbance shall be verified by the project biologist prior to initiation of clearing or grading activities. All movement of construction contractors, including ingress and egress of equipment and personnel, shall be limited to designated construction zones. This fencing shall be removed upon completion of all construction activities.

ii. No temporary storage or stockpiling of construction materials shall be allowed within the Ecological Reserve or Restoration Lands, and all staging areas for equipment and materials shall be located at least 50 feet from the edge of these areas. This prohibition shall not be applied to facilities that are planned to traverse Ecological Reserve or Restoration Lands (e.g., trails and utilities). Staging areas and construction sites in proximity to the Ecological Reserve or Restoration Lands shall be kept free of trash, refuse, and other waste; no waste dirt, rubble, or trash shall be deposited in these areas.

iii. Equipment to extinguish small brush fires (e.g., from trucks or other vehicles) shall be present on site during all phases of project construction activities, along with personnel trained in the use of such equipment. Smoking shall be prohibited in construction areas adjacent to flammable vegetation.

iv. Temporary night lighting shall not be used during construction unless determined to be absolutely necessary. If night lighting is necessary, lights shall be directed away from sensitive vegetation communities and shielded to minimize temporary lighting of the surrounding habitat.

Bio-3F **Construction Monitoring.** During project construction, a biological monitor shall visit the site weekly during site preparation and rough grading activities, and monthly following completion of rough grading, until construction is completed. During site visits, the monitor shall be responsible for ensuring that the construction activities and staging areas are restricted to the approved limits of work, and protective fencing is adequately maintained. The monitor shall be responsible for ensuring that the contractor adheres to the other provisions described above. The monitor, in cooperation with the on-site construction manager, shall have the authority to halt construction activities in the event that these provisions are not met. Monitors shall submit regular reports to the UC San Diego Campus Planning Office during construction documenting the implementation of construction measures Bio-3E.

Bio-3G **Best Management Practices for Tree Installations**. The following best management practices shall be implemented for each project that would remove or install tree species on UC San Diego that may be used as host trees by SHBs:

i. Trees to be planted on UC San Diego shall be obtained from a reliable source and be free of sign of SHB infestation.

ii. An education program for on-site workers responsible for tree installation shall be implemented. The program shall describe the signs of SHB infestation (e.g., sugary exudate on trunks or branches, and SHB entry/exit holes [approximately the size of the tip of a ballpoint pen]).

iii. Sign of SHB infestation shall be reported to CDFW and UC Riverside's Eskalen Lab (www.eskalenlab.ucr.edu) by the UC San Diego Project Manager and/or the project biologist.

iv. Trees with sign of SHB infestation shall be pruned or removed, as appropriate, and potential host materials shall be chipped to less than one inch prior to composting on site or transfer to a landfill.

v. Equipment that is used to prune or remove SHB-infected trees shall be disinfected prior to additional use.

vi. Biologists monitoring mitigation sites shall be knowledgeable regarding sign of SHB infestation.

Bio-3H **Brush Management**. Areas selectively thinned for brush management shall be monitored by a qualified biologist for establishment of invasive plant species pursuant to the HMP.

Bio-3I **Invasive Species Prevention**. Landscaping adjacent to the Open Space Preserve shall comply with the following requirements to prevent the introduction of invasive species:

i. Appropriate landscaping shall be selected based on the vegetation communities within the portion of the Open Space Preserve adjacent to the project. In areas supporting native (or disturbed native) vegetation communities, revegetation of impacted slopes shall be with appropriate native plant materials. In particular, where the Open Space Preserve is disturbed by construction of the Campus Meander, installation of native plants such as lemonadeberry, toyon, deerweed (*Acmispon glaber*), monkey flower (*Diplacus aurantiacus*), and sages (*Salvia* spp.) are recommended to make the Open Space Preserve more impenetrable to people while reinforcing the boundaries and edges of the Campus Meander (The Harrison Studio 1997).

ii. Only non-invasive plant species shall be included in the landscape plans for projects (species not listed on the California Invasive Plant Inventory prepared by the Cal-IPC [2006]). A qualified landscape architect and/or qualified biologist shall review landscape plant palettes prior to implementation to ensure that no invasive species are included.

iii. Any planting stock brought onto a project site adjacent to the Open Space Preserve for landscaping or habitat restoration shall be inspected to ensure it is free of pest species that could invade natural areas, including but not limited to Argentine ants and South American fire ants. Inspections of planting stock for habitat restoration shall be by a qualified biologist, and inspections of planting stock for landscaping shall be the responsibility of qualified UC San Diego Project Manager or their designated assignee. Any planting stock found to be infested with such pests shall be quarantined, treated, or disposed of according to best management practices by qualified personnel, in a manner that precludes invasions into natural habitats.

Bio-3J **Light Shielding.** Permanent lighting within or adjacent to the Ecological Reserve and Restoration Lands shall be selectively placed, shielded, and directed to minimize potential impacts to sensitive species. In addition, lighting from buildings or parking lots/structures abutting the Ecological Reserve shall be shielded and/or screened by vegetation to the extent feasible.

Bio-3K **Water Quality Best Management Practices.** The following best management practices shall be implemented by the campus along areas that interface with the Open Space Preserve to address runoff/water quality impacts from landscaping:

i. Integrated Pest Management principles (University of California Integrated Pest Management Program) shall be implemented to the extent practicable for areas in and adjacent to the Open Space Preserve for chemical pesticides, herbicides, and fertilizers. Examples of such measures may include, but are not limited to, alternative weed/pest control measures (e.g., removal by hand) and proper application techniques (e.g., conformance to manufacturer specifications and legal requirements).

ii. Irrigation for project landscaping shall be minimized and controlled in areas in and adjacent to the Open Space Preserve through efforts such as designing irrigation systems to match landscaping water needs, using sensor devices to prevent irrigation during and after precipitation, and using automatic flow reducers/shut-off valves that are triggered by a decrease in water pressure from broken sprinkler heads or pipes.

Bio-3L **Signage and Fencing Along Ecological Reserve**. Signage and fencing shall be installed along the edge of the Ecological Reserve to protect sensitive habitats from human disturbance with the following techniques:

i. Projects adjacent to the Ecological Reserve shall install open space signage along the boundary of the reserve, indicating the presence of lands supporting sensitive habitat.

ii. Projects adjacent to the Ecological Reserve shall install fencing or other visual/physical barriers (such as appropriate landscaping) to discourage human encroachment into the Open Space Preserve in areas where trespass is likely to occur (gradual slopes; areas of low, open vegetation; areas of previous disturbance, etc.).

Bio-3M **Storm Water Facilities Adjacent to Sensitive Habitats.** Maintenance of storm water facilities shall be conducted in a manner to minimize impacts to adjacent sensitive habitats. Maintenance will be overseen by a qualified biologist and occur outside the general bird breeding season which extends from February 15 through August 31.

Revised mitigation measures for the Update to the 2018 LRDP:

Mitigation measure Bio-3A was revised to clarify that project sites containing undeveloped land would need vegetation mapping that has been updated within the previous five years; the survey requirement applies to all undeveloped lands, not just those that have been identified as containing sensitive natural communities. This modification will help ensure that sensitive natural communities that may result from habitat succession over time are identified and adequately analyzed for future projects. The revisions to mitigation measures Bio-3C and Bio-3D provide clarification regarding requirements for permanent impacts versus temporary impacts to riparian habitat or other sensitive natural communities, with temporary impacts being restored in place pursuant to newly added mitigation measure Bio-3N. The Bio-3C mitigation ratios were previously included in Table 3.3-3 in the 2018 LRDP EIR but were not in the mitigation measure. This measure also adds additional clarity on how non-native grassland can be mitigated. Mitigation measure Bio-3D was revised to add clarifying language regarding mitigation requirements for permanent versus temporary impacts, the 1:1 creation component for wetlands, and compliance with regulatory permitting requirements. These revisions provide added clarity for applying mitigation requirements on future projects.

The revised and new mitigation measures are provided in full below. Changes from the 2018 LRDP EIR measures are shown in strikeout/underlined text.

Bio-3A **Sensitive Vegetation Communities Mapping**. For project~~s~~ sites that contain undeveloped land, for which ~~the site is mapped as supporting a sensitive vegetation type and~~ vegetation mapping has not been conducted on the site in the preceding five years, updated vegetation mapping shall be conducted by a qualified biologist as part of the project planning and environmental review process.

Bio-3C **Upland Habitat Replacement**. Permanent impacts to sensitive upland vegetation communities shall be mitigated through the preservation of habitat, habitat creation, and/or enhancement, or a combination thereof on the UC San Diego campus or off-campus through habitat acquisition and preservation or the purchase of credits from an approved conservation bank. Mitigation ratios for permanent impacts shall be 2:1 for Diegan coastal sage scrub, maritime succulent scrub, southern maritime chaparral, coastal bluff scrub, and native grassland habitats; 1:1 for southern mixed chaparral and chaparral/eucalyptus woodland ecotone; and 0.5:1 for non-native grassland. Mitigation for impacts to upland communities shall be in-kind, except for non-native grassland, which can be mitigated with a native or non-native grassland community or other similarly functioning or higher quality habitat. Temporary impacts to sensitive upland vegetation communities will be restored in-place at a 1:1 ratio through appropriate seeding and/or planting pursuant to mitigation measure Bio-3N.

Bio-3D **Riparian Habitat Replacement**. Mitigation required for permanent impacts to wetland habitat shall be accomplished at an overall ratio of 3:1, which includes ~~and must incorporate~~ a minimum 1:1 creation component to ensure no net-loss of these communities. The exception to the 1:1 creation component shall be where 1:1 creation is not required by the wetland permitting authorities and the no net loss of functions and values directive is met through other types of approved mitigation. Wetland mitigation shall occur through creation, restoration, enhancement, and/or preservation, or a combination thereof, or through the purchase of credits at an

approved wetland mitigation bank. UC San Diego shall contact the appropriate permitting agencies (e.g., USACE, RWQCB, CDFW, and CCC [for projects within the Coastal Zone]) and shall comply with the ~~to discuss project~~ permit~~ting~~ requirements of the regulating agencies. ~~and the~~ The following conditions shall also apply:

i. A detailed wetland restoration plan shall be prepared for all projects requiring wetland mitigation (except for mitigation met through the purchase of credits from an approved wetland mitigation bank). The plan shall include, at a minimum, the proposed location of the mitigation area(s), site preparation, plant palette, success criteria, monitoring requirements, and other details of the habitat restoration effort, and be prepared by a qualified biologist. The plan shall be subject to approval by the corresponding regulatory permitting agencies (i.e., USACE, RWQCB, CDFW, and CCC [for projects within the Coastal Zone]) as part of the wetland permitting process.

ii. UC San Diego may choose to mitigate wetland impacts on a project-by-project basis, or create an advanced wetland mitigation area, whereby wetland habitat is created or enhanced in advance of anticipated impacts. Mitigation activities shall be undertaken only where the habitat would be considered to be viable in the long-term, given the other surrounding uses planned by the proposed 2018 LRDP. Any Open Space Preserve areas that are used as wetland habitat mitigation shall be redesignated as Ecological Reserve and included in long-term management conducted pursuant to UC San Diego's Habitat Management Plan.

iii. Temporary impacts to wetlands will be restored in-place at a 1:1 ratio through appropriate seeding and/or planting pursuant to mitigation measure Bio-3N.

New mitigation measure for the Update to the 2018 LRDP:

Mitigation measure Bio-3N was added to address temporary impacts to sensitive natural communities from implementation of the Update to the 2018 LRDP. The measure was added to clarify the mitigation requirement for temporary impacts as distinct from the mitigation requirement for permanent impacts, as temporary impacts are restored in place while permanent impacts are mitigated outside the project site and at different ratios than temporary impacts. These revisions provide added clarity for applying the habitat mitigation requirements on future projects.

Bio-3N **Habitat Mitigation for Temporary Impacts.** Temporary impacts to sensitive vegetation communities including wetland habitats and sensitive upland habitats, shall be restored in place at a 1:1 ratio. Restoration shall be implemented in the final phase of construction or during an earlier phase if no additional impacts from future construction phases would occur. A Revegetation Plan shall be prepared and approved by UC San Diego Campus Planning prior to construction. The plan shall include site preparation specifications, plant palette, installation procedures, development of reasonable success criteria, appropriate monitoring and reporting protocols, implementation timelines, and contingency measures in the event of restoration failure. UC San Diego Campus Planning shall provide guidance for and oversight of the Revegetation Plan and implementation, respectively. The Revegetation Plan shall also include the process for establishing and sampling a representative reference site within the La Jolla Campus and the criterion for

removing and minimizing non-native plant species listed as invasive by the California Invasive Plant Council.

Level of Significance After Mitigation

Implementation of mitigation measures Bio-3A through Bio-3N would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

3.3.3.4 ISSUE 4 — WETLANDS

Biological Resources Issue 4 Summary

Would implementation of the Update to the 2018 LRDP have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Compensatory mitigation (Bio-3D, Bio-3N); wetland delineation (Bio-4); and conformance with and receipt of all applicable permits.

Summary of Analysis in the 2018 LRDP EIR

Campus wetlands are described in the 2018 LRDP EIR in 3.3.1.2, with impacts depicted on Figures 3.3-1 through 3.3-3. Per the 2018 LRDP EIR, 0.46 acre of campus wetlands would be impacted under the 2018 LRDP, with 13.56 acres avoided. The 2018 LRDP EIR estimated direct impacts for development proposed in and adjacent to areas of previously undeveloped land. Per Section 3.3.3 of the 2018 LRDP EIR, no direct biological resource impacts to vegetation communities, including wetlands, were found to result from redevelopment of existing developed areas. Section 3.3.3.4 of the 2018 LRDP EIR determined that a potentially significant impact could occur to wetland habitat from the implementation of the 2018 LRDP. Mitigation measure Bio-4 was identified in the 2018 LRDP EIR to address potential indirect impacts to wetlands and reduce those impacts to less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP would focus on redevelopment of existing developed lands and would not result in a substantial increase in impacts to wetlands. No substantial new impacts to wetlands have been identified since the certification of the 2018 LRDP EIR.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no changes with respect to circumstances under which the Update to the 2018 LRDP would be undertaken, and there is no new information of substantial importance that has become available relative to Issue 4, Wetlands. Redevelopment areas identified under the Update to the 2018 LRDP would not result in impacts to wetlands. One new development area proposed under the Update to the 2018 LRDP (the potential wastewater treatment plant) would impact a single potentially jurisdictional wetland habitat, however, this impact would be mitigated in accordance with measures in the 2018 LRDP EIR and carried forward herein. No substantial new impacts to wetlands have been identified since the certification of the 2018 LRDP EIR.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Assumptions and Methodology

As explained in Section 3.3.1.1, no new biological surveys were conducted for this SEIR; the analysis below relies on the 2018 BRTR (HELIX 2018) and the addendum to the BRTR prepared for the Update to the 2018 LRDP (HELIX 2025).

Impact Analysis

Implementation of the Update to the 2018 LRDP would not expand campus development impacts into new wetland habitat types not previously analyzed in the 2018 LRDP but would result in a potential increase in impacts to southern willow scrub over the amount identified in the 2018 LRDP. This impact is associated with the potential wastewater treatment plant north of La Jolla Village Drive. The 2018 LRDP identified potential future stormwater improvements in this general area, but no specific project boundary was available at that time. Approximately 0.10 acre of impacts to southern willow scrub are associated with the potential wastewater treatment plant. This wetland is a small stand of habitat without connection to other wetland habitats and is immediately adjacent to the roadway. Mitigation measure Bio-4 was identified in the 2018 LRDP EIR to address potential direct impacts to wetlands and reduce those impacts to less than significant. This mitigation measure is carried forward into this SEIR.

Level of Significance Before Mitigation

As described above, impacts would be potentially significant, consistent with the conclusion in the 2018 LRDP EIR. Therefore, the following mitigation measure would be implemented.

Mitigation Measures

Applicable measure from the 2018 LRDP EIR:

See below for edits to mitigation measure Bio-4.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

The following measure has been revised to include mitigation measure Bio-3N to the description of requirements.

Bio-4 **Jurisdictional Delineation.** During the project planning process, if a project has vegetation mapped as potential wetlands or the project site contains or is located immediately adjacent to a natural drainage course, a qualified biologist shall conduct a jurisdictional delineation. The jurisdictional delineation shall use current regulatory guidance to identify the presence of potential regulated waters and wetlands in the project vicinity. If there is potential for the project to adversely affect wetlands or waters, impacts shall be avoided and minimized during project design process, to the extent practicable, and unavoidable impacts shall be mitigated through implementation of mitigation measures Bio-3D and Bio-3N, as applicable, and conformance with applicable wetland permit conditions.

Level of Significance After Mitigation

Implementation of mitigation measures Bio-4, Bio-3D, and Bio-3N (above) would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

3.3.4 CUMULATIVE IMPACTS AND MITIGATION

Biological Resources Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative biological resources impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Regional loss of sensitive plants, animals, and vegetation communities.	Potentially significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with Bio-1A, Bio-1B, Bio-2A through Bio-2G.
Regional loss of riparian or other sensitive natural communities.	Potentially significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with implementation of Bio-3A through Bio-3N.
Federally protected wetlands as defined by Section 404 of the Clean Water Act.	Potentially significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with Bio-3D, Bio-3N, and Bio-4.

The study area for cumulative impacts on biological resources is the nation, state and San Diego region, depending on the sensitivity of the resource. The cumulative setting for riparian habitat and federally protected wetlands is localized in the San Diego region, the same as the 2018 LRDP EIR.

Sensitive Plants, Sensitive Animals, Vegetation Communities and Federally Protected Wetlands

Section 3.3.4 of the 2018 LRDP EIR concluded that impacts to sensitive plants, sensitive animals, vegetation communities, and federally protected wetlands would be potentially significant but not cumulatively considerable. The 2018 LRDP EIR concluded that the 2018 LRDP would increase impacts to native vegetation communities anticipated within the City's Multiple Species Conservation Plan (MSCP) study area by less than 0.01 percent. Impacts would be minimized through mitigation and the preservation afforded by the Open Space Preserve lands on the UC San Diego Campus. Implementation of the 2018 LRDP would conserve 335.3 acres of land in the Open

Space Preserve, including 178.8 acres in the Ecological Reserve and 59.3 acres in Restoration Lands. Vegetation community mitigation would be managed in perpetuity under the UC San Diego HMP.

New development proposed under the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP but would result in (1) a potential increase to southern willow scrub impacts over the amount identified in the 2018 LRDP, (2) a potential increase to coastal sage scrub impacts over the amount identified in the 2018 LRDP (no more than one acre of total impacts); and (3) impacts to eucalyptus woodland, which has potential to be used as monarch butterfly overwintering habitat. Redesignation of Urban Forest from Open Space Preserve to General Services for the proposed electrical substation near Hopkins Drive would result in a less than significant impact to biological resources, as (1) the land does not contain sensitive habitats, (2) impacts to eucalyptus woodland that could support overwintering monarch butterfly would be mitigated through implementation of MM Bio-2G, and (3) the University would add an equal acreage of land to the Open Space Preserve elsewhere on campus, resulting in no net loss of campus Open Space Preserve areas. Impacts from direct impacts to southern willow scrub and coastal sage scrub resulting from new development (of a potential wastewater treatment plant electrical substation), and indirect impacts to Ecological Reserve for redevelopment of Warren College Housing would be reduced to a level below significance through implementation of mitigation measures Bio-3A through Bio-3N, which address direct and indirect impacts to sensitive natural communities. All project impacts to sensitive plant and animal species resulting from the Update to the 2018 LRDP would be reduced to a level less than significant with the implementation of mitigation measures Bio-2F, Bio-2G, and Bio-2H, which address Crotch's bumble bee, monarch butterfly, and bird strikes, respectively. As such, the Update to the 2018 LRDP would not result in a considerable contribution to a cumulatively significant impact to biological resources, consistent with the conclusion in the 2018 LRDP EIR.

3.3.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

The following section discusses the other Standards of Significance related to Biological Resources contained in Appendix G of the CEQA Guidelines wherein the proposed Update to the 2018 LRDP was determined to not cause a significant effect.

Would implementation of the Update to the 2018 LRDP interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Section 3.3.5 of the 2018 LRDP EIR determined that development of the proposed 2018 LRDP could impact a small portion of land near SIO Canyon; however, the impacts would be adjacent to Expedition Way and concentrated in eucalyptus woodland and would not preclude wildlife movement within the canyon. No other impacts were anticipated within these areas, and implementation of the 2018 LRDP would not impact wildlife corridors or linkages. Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP, but would result in: (1) a potential increase to coastal sage scrub impacts over the amount identified in the 2018 LRDP (no more than one acre of total impacts); and (2) would add a redevelopment area adjacent to the Ecological Reserve, which supports sensitive species and vegetation communities. The incremental direct and indirect impacts to these areas, respectively, would not preclude wildlife movement that may occur within

these areas. Therefore, implementation of the Update to the 2018 LRDP would not result in a new or more severe impact to wildlife corridors than previously discussed in the 2018 LRDP EIR.

Would implementation of the Update to the 2018 LRDP conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

During preparation of the 2018 LRDP EIR, UC San Diego voluntarily reviewed the LRDP for consistency with local policies and ordinances found in the City's Land Development Code (2000), including the Environmentally Sensitive Lands (ESL) regulations and the City Biology Guidelines (2012), and determined that there are no specific local policies that address biological resources on UC San Diego. Applicable development projects implemented under the Update to the 2018 LRDP would be required to comply with UC San Diego's Tree Preservation Guidelines, described in Section 3.3.2.2. Therefore, no local policy conflicts would arise with implementation of the proposed Update to the 2018 LRDP, and no significant impact would occur.

Would implementation of the Update to the 2018 LRDP conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?

UC San Diego is not included within the City's MSCP (City of San Diego 1997), nor is UC San Diego an enrolled agency in the Natural Community Conservation Planning (NCCP) Program. However, the MSCP was also taken into account during the preparation of the 2018 LRDP biological resources analysis due to its applicability to the surrounding region. The 2018 LRDP is not proposing development that would directly or indirectly affect the resources preserved on nearby Multiple Habitat Planning Area (MHPA) lands. There are no direct wildlife corridors between the Open Space Preserve and MHPA lands as major roadways block these connections. Therefore, no impacts were anticipated to the City's MSCP or the NCCP Program from implementation of the 2018 LRDP.

The UC San Diego HMP, originally prepared in 2010 for the preservation and long-term management of open space on campus pursuant to the OSMP, was updated in 2019 to address updated campus open space designations and Ecological Reserve boundaries implemented with the 2018 LRDP. The Update to the 2018 LRDP does not propose changes to the Ecological Reserve boundaries addressed in the 2019 HMP; therefore, it would not conflict with the provisions of this plan. Implementation of the Update to the 2018 LRDP would not expand campus impacts into new sensitive habitat types not previously addressed in the 2018 LRDP and would, therefore, not create new or more severe conflicts with any habitat conservation plan than previously discussed in the 2018 LRDP EIR.

3.3.6 REFERENCES

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3.4 CULTURAL RESOURCES

This section of the SEIR evaluates the potential for impacts to cultural resources resulting from implementation of the Update to the 2018 LRDP. It identifies known and potential cultural resources within the project area based upon available cultural resources reports. The majority of the information provided in this section is summarized from the Archaeological Resources Report for the 2018 UC San Diego LRDP prepared by AECOM (Appendix D of the 2018 LRDP EIR), the Addendum to the Archaeological Resources Report for the 2018 UC San Diego LRDP prepared by HELIX (Addendum Report) prepared by HELIX (Appendix D1[1]; Turner and Robbins-Wade 2025); the Supplement to the UC San Diego LRDP Historical Resources Technical Report prepared by Architectural Resources Group (Appendix E; ARG 2025), and the UC San Diego LRDP Historical Resources Technical Report (Appendix G of the 2018 LRDP EIR; ARG 2018), and consultation with Native American tribes pursuant to Assembly Bill (AB) 52.

Under CEQA, a tribal cultural resource may also be a historic resource described in Section 21084.1 or an archaeological resource described in PRC Section 21083.2, subdivisions (g) or (h) if the resource also conforms with the tribal cultural resource criteria of PRC Section 21074(a) (PRC Section 21074[c].) For this reason, tribal cultural resources are discussed as appropriate here in the context of archaeological and historical resources. For this SEIR, tribal cultural resources are discussed separately in Section 3.11 to be consistent with the current guidance from CEQA Appendix G. Paleontological resources are addressed in Section 4.1.2, Geology and Soils, under 4.1.2.6, Paleontological Resources, of this SEIR.

3.4.1 ENVIRONMENTAL SETTING

The cultural resources present at UC San Diego and the surrounding areas are described in detail in Section 3.4, *Cultural and Tribal Cultural Resources*, of the 2018 LRDP EIR, including discussion of the cultural context of the area, known and potential cultural, historical, tribal cultural, and archaeological resources, and relevant federal and state regulations. This section focuses on changes from information disclosed in the 2018 LRDP EIR and provides an updated analysis of impacts on cultural resources relative to revisions proposed in the Update to the 2018 UC San Diego La Jolla Campus LRDP and current regulations.

The 2018 LRDP EIR contains descriptions of the historical and cultural context of the campus, including prehistory (Section 3.4.1.1), ethnohistory (3.4.1.2), and history (3.4.1.3). A detailed discussion of the development of UC San Diego and the full historic context statement prepared by ARG in 2016 for the campus is located in in Appendix E of the 2018 LRDP EIR.

3.4.1.1 CULTURAL AND HISTORICAL RESOURCES

Cultural resources are districts, buildings, sites, structures, areas of traditional use, or objects that represent the physical evidence of human activities. Cultural resources can be divided into three categories: archaeological resources (prehistoric and historic), architectural resources (built environment), and Tribal Cultural Resources. HELIX prepared an Addendum to the Archaeological Resources Report for the Update to the 2018 UC San Diego LRDP (HELIX 2024; see Appendix D of this SEIR), which includes a summary of the cultural resource studies and monitoring programs

[1] The Addendum to the Archaeological Resources Report contains confidential information and is not available for public review.

that have occurred following adoption of the 2018 LRDP, an updated records search, results from a field survey of two newly proposed development areas, and the results of the AB 52 consultation that has occurred to date for the Update to the 2018 LRDP (see Section 3.11, Tribal Cultural Resources, for a summary of the AB 52 consultation).

Updated Record Search

The Addendum Report includes an updated records search of the UC San Diego La Jolla campus and a one-quarter mile radius around it. While 14 resources were identified in this records search that were not included in the records search for the 2018 LRDP cultural resources study, only four of these are located within the defined boundaries of the LRDP area (see Table 3.4-1, *Resources Recorded at SCIC Post-2018 Records Search*, below); the others are in properties within one quarter mile but outside the campus (See Appendix D for additional details). Resource P-37-034755/CA-SDI-21619 was noted as a highly fragmented scatter or "smear" of marine shell, animal bone, and historic or modern trash observed during a survey of a SDG&E pole. The other three sites were historic refuse scatters found during monitoring for the Ridge Walk Improvements Project and assessed as not significant resources.

Table 3.4-1
RESOURCES RECORDED AT SCIC POST-2018 RECORDS SEARCH

Resource Number	Description	Recorder, Date	Status/Significance	Recommendations
P-37-034755 CA-SDI-21619	A multi-component site with a highly fragmented scatter of marine shell, animal bone, and modern/historic debris with an unidentified concrete structure.	Tift and Dickerson, 2014	Not evaluated.	Testing to determine significance, followed by preservation or data recovery for portions determined to be significant.
P-37-039585 CA-SDI-23141	A historic-era glass bottle scatter with artifacts dating between 1929 and 1964.	Stanley, 2021	Not significant (Castells 2021).	No further work.
P-37-039586 CA-SDI-23142	A historic-era glass bottle scatter with artifacts dating between 1913 and 1968.	Stanley, 2021	Not significant (Castells 2021).	No further work.
P-37-039587 CA-SDI-23143	A historic-era glass bottle scatter with artifacts dating to the mid-twentieth century.	Stanley, 2021	Not significant (Castells 2021).	No further work.

Cultural Resource Studies and Monitoring Programs – Post 2018

A number of cultural resource studies have occurred following the adoption of the LRDP in 2018 and the AECOM study. Five cultural resource studies, the majority of which occurred within the West Campus or SIO areas, generally consisted of a records search and field survey of the project study areas, as well as contacting the Native American Heritage Commission for a Sacred Lands File search and archival research. One additional study, for the La Jolla Innovation Center (8980 Villa La Jolla) project, did not include fieldwork, as the entire project site was paved and supported existing

buildings, with no open ground; it did include a records search, Sacred Lands File search, and literature review. A survey of an area just outside the LRDP area but in proximity to it included a large, significant cultural resource that attests to the cultural significance of this area. Additionally, several monitoring programs have been implemented since 2018 that monitored ground disturbance associated with land development projects on campus. Most of these survey and monitoring projects resulted in no resources being identified on the UC San Diego campus; however, three monitoring projects resulted in the identification of previously undocumented cultural resources. In addition, previously recorded resources were observed during a few surveys and monitoring projects.

LRDP Update Field Survey

To account for the two areas within the Open Space Preserve which are now proposed to be redesignated as General Services land use to accommodate potential development of utility sites under the Update to the 2018 LRDP (see Section 2.4.4.1, Land Use, of the Project Description, and Figures 2-4 and 2-5), a field survey of the two proposed utility areas was conducted by a HELIX archaeologist and a Native American monitor on October 15, 2024. This study is described in further detail in Chapter 3.11, Tribal Cultural Resources, and in the Addendum Report. No cultural resources were identified as a result of the field survey.

3.4.1.2 ARCHAEOLOGICAL RESOURCES

In compliance with the UC San Diego 2018 LRDP mitigation measures Cul-2B, Cul-2C, Cul-5A, and Cul-5B, Red Tail Environmental (Red Tail) conducted a cultural resources survey in conjunction with a potential project to address erosion control and stormwater runoff in the SIO portion of the campus. The field survey resulted in the identification of two artifact concentrations and over 100 individual artifacts associated with CA-SDI-525, as well as marine shell and animal bone. The project proposed to cap this significant resource to avoid further inadvertent impacts to the site; however, no development has occurred and capping of the site has yet to be implemented.

In compliance with the UC San Diego 2018 LRDP mitigation measures Cul-2D and Cul-2E, Red Tail conducted a cultural resources monitoring program in 2021 for a campus improvement project. Three previously unidentified resources were identified during the monitoring effort, consisting of three historic refuse deposits with numerous historic artifacts. These resources were collected and evaluated – it was determined that all three resources were not significant under CEQA.

In late 2022 and early 2023, and in compliance with the UC San Diego 2018 LRDP mitigation measures Cul-2D, Cul-2E, and Cul-5B, HELIX implemented a monitoring program for a housing development project on the West Campus**.** Two resources were recovered during the monitoring program: a historic refuse deposit consisting of fewer than 10 items, and an isolated abalone shell fragment. Following the completion of the project, the historic artifacts were returned to UC San Diego for potential interpretive display; the disposition of the abalone shell fragment is yet to be determined.

In compliance with the UC San Diego 2018 LRDP mitigation measures Cul-2D and Cul-2E, Red Tail conducted an archaeological monitoring program for another housing development project on the West Campus in 2023. The project resulted in the recovery of one historic era refuse scatter and seven prehistoric isolated artifacts. Following the completion of the project, UC San Diego entered into consultation with the Kumeyaay Cultural Repatriation Committee (KCRC) regarding the repatriation of the recovered prehistoric resources.

In compliance with the UC San Diego 2018 LRDP mitigation measures Cul-2D, and Cul-2E, HELIX conducted cultural resource monitoring for an irrigation repair project on the West Campus in 2024. During the excavation to expose an irrigation line, several pieces of flaked stone and a possible lithic core were recovered within the known cultural resource; following recordation, the artifacts were reburied within the irrigation trench in their original locations.

An additional study that consisted of a pedestrian survey, conducted by Red Tail Environmental in 2020, located adjacent to the UC San Diego properties but outside the LRDP boundary, resulted in the identification of significant and sensitive cultural resources. Two resources were mapped at the South Coastal Information Center (SCIC) within an area described by the Kwaaymii Laguna Band of Mission Indians as sensitive with known sensitive resources. The field survey resulted in the reidentification of the resources originally mapped. While this study is not located within the LRDP area, it does demonstrate the sensitivity of the coastal region surrounding the UC San Diego properties.

3.4.1.3 HISTORICAL BUILT ENVIRONMENT RESOURCES

A built environment resource is any above-ground building, structure, object, or district. The term "historical resource" includes, but is not limited to: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register; (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record (CEQA Guidelines Section 15064.5(a)).

The eligibility requirements for listing in the National Register of Historic Places (NRHP) is described in Section 3.4.2.1 of the 2018 LRDP EIR. Generally, to be eligible for listing in the NRHP, a resource must be at least 50 years old unless it is of exceptional importance, as outlined in 36 Code of Federal Regulations (CFR) 60.4. Fifty years is commonly used as an age threshold for determining historic eligibility, though there is no prescribed age requirement needed for listing in the California Register of Historical Resources (CRHR). The 2018 LRDP was prepared as many of the buildings and other improvements on the La Jolla campus had either reached, or were approaching, 50 years of age.

To be eligible for listing in the CRHR, a resource must first be deemed significant under one of the following four criteria:

- *Criterion 1* (events): associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

- *Criterion 2* (persons): associated with the lives of persons important to local, California, or national history;

- *Criterion 3* (architecture): embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; and

- *Criterion 4* (information potential): has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.

The UC San Diego LRDP Historical Resources Technical Report (ARG 2018) included an analysis of all resources constructed through 1985 to provide a look-ahead at all resources that may become eligible over the 17-year planning horizon of the LRDP (through 2035–2036 school year). The significant built environment resources located within the UC San Diego campus that were considered historical resources for the purposes of CEQA in the 2018 Historical Resources Technical Report can be found in Section 3.4 of the 2018 LRDP EIR.

Supplemental Historic Resources Survey

An Addendum to Supplemental Campus Historic Resources Survey (ARG 2025; Appendix E) was completed to identify potential campus historical resources with construction dates between 1986 and 1990, or five years beyond the 2018 LRDP Historical Resources Technical Report cutoff date of 1985. This provides a look-ahead of all resources that would approach 50 years of age and may become an eligible resource by the 2040 horizon year of the Update to the 2018 LRDP. The addendum to the supplemental historic resources survey also includes a more limited evaluation of campus resources built between 1991 and 1995, to provide a conservative look-ahead at resources from the recent past that comprise the next set of resources potentially eligible for consideration. Buildings constructed after 1995 would still be below the 50-year threshold by 2040 and would not require historical evaluation during implementation of the Update to the 2018 LRDP. To avoid premature analysis of newer buildings that have not yet attained historical significance and do not currently meet the definition of "historical resources" for purposes of CEQA, this evaluation focuses on resources that appear to currently be eligible for listing in the California Register.

The addendum to the supplemental historic resources survey did not re-evaluate historical resources identified in the previous survey; in addition, it confirmed that no additional built resources constructed in 1985 or earlier now merit consideration for historical significance based on changed circumstances, and for this reason resources built before 1985 were not re-evaluated.

The supplemental survey addressed all aspects of the built environment, including the following:

- **Buildings**, which are erected to shelter some aspects of human habitation. As buildings are the foundation of any developed area, they represent a common resource type. They house a variety of residential, commercial, institutional, and industrial uses.

- **Structures**, which are also substantive constructions composed of structural elements, but unlike buildings they serve a purpose aside from human habitation. Common examples of structures identified in a historic resource survey include bridges, tunnels, gazebos, dams, and lighthouses.

- **Objects**, which are differentiated from structures in that they are either decorative or nature or are comparatively small and simply constructed. Resources such as signs, fountains, monuments, sculptures and public art installations, and streetlamps are typically classified as objects.

- **Sites**, which are defined as areas that possess historic or cultural value and whose significance is not related to any building, structure, or object that may (or may not) be

present. Some common examples include archaeological sites, natural features, parks, and designed landscapes.

- **Districts**, which are identifiable areas related geographically and by theme. Districts are significant for the interrelationship between their resources and consist of historically and/or functionally related properties. Residential neighborhoods, commercial areas, and institutional campuses are examples of resources that may be recorded as historic districts.

- **District Contributors and Non-Contributors**, which refer to the buildings, structures, objects, sites, and other features that are located within the boundaries of a historic district. Generally speaking, contributors help to convey the significance of the district. Non-contributors, on the other hand, are identified as such because they have been extensively altered or were built outside of the district's historic period (known as the period of significance.

The addendum to the supplemental historic resources survey identified seven additional resources that could be eligible for listing in the CRHR. The seven resources listed may also become eligible for listing in the NRHP over the life of the Update to the 2018 LRDP once they reach the 50-year age threshold required by the NRHP. The seven additional resources that meet the definition of "historical resources" for purposes of CEQA and the Update to the 2018 LRDP are summarized in Table 3.4-2, *Summary of Built Environment Historical Resources*, shown in Figures 3.4-1a through 3.4-1d, *Built Environment Resources*; Figures 3.4-2a through 3.4-2g, and described below.

Table 3.4-2
SUMMARY OF BUILT ENVIRONMENT HISTORICAL RESOURCES

Name	Resource Type	Year Built	Significance Status
West Campus			
Irwin Mark and Joan Klein Jacobs Engineering Hall	Building	1988	CRHR Criterion 3
George Palade Laboratories for Cellular and Molecular Medicine	Building	1990, 1995 (addition)	CRHR Criterion 3
Robinson Building Complex	Building Complex	1990	CRHR Criterion 3
Mandell Weiss Forum	Building	1991	CRHR Criterion 3
Visual Arts Facility	Building Complex	1993	CRHR Criterion 3
Library Walk	Landscape	1995	CRHR Criterion 3
SIO Campus			
IGPP Revelle Laboratories	Building Complex	1993	CRHR Criterion 3

Source: ARG 2025
Note: CRHR eligibility criteria described in Section 3.4.3.1 under "Standards of Significance."



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Source: UC San Diego 2018

HELIX Environmental Planning

Built Environment Resources

Figure 3.4-1a

UC San Diego

Individual Buildings/Resources
- Eligible for NRHP (3S)
- Eligible for CRHR (3S)

Historic Districts*
- District Boundaries
- District Contributor; Not Individually Eligible (3D, 3CD)
- District Non-Contributor (6Z)

Historic Landscapes
- Individual Landscape, Eligible for NRHP (3S)
- Contributing Landscape, Associated with an Eligible Building or District; Not Individually Eligible
- Individual Landscape, Eligible for CRHR (3S)

**All individually elibigle resources (buildings, landscapes) that are located within a historic district are also district contributors*

Robison Building Complex
Irwin Mark and Joan Klein Jacobs
Geisel Library
"Thirty Blocks"
MUIR COLLEGE HISTORIC DISTRICT
Library Walk
Visual Arts Facility
Stewart Commons Annex
Stewart Commons
Tenaya Hall
Mandler Hall
Applied Physics and Mathematics
McGill Hall
Tioga Hall
Katzin Courtyard
Biology Building
Eucalyptus Grove
CAMP MATTHEWS HISTORIC DISTRICT
University Center 409
University Center 401
University Center 201
University Center 302
University Center 301
University Center 202
Muir College Apartments (Tamarack Apartments)
Humanities and Social Sciences
Mandeville Center
Natatorium
Main Gymnasium
Recreation Gymnasium
Biomedical Sciences Building
Bonner Hall and Breezeway
REVELLE COLLEGE HISTORIC DISTRICT
Urey Hall
George Palade Laboratories for Cellular and Molecular Medicine
Medical Teaching Facility
Mayer Hall
Biomedical Library
Revelle Commons
Blake Hall
Argo Hall
Revelle Plaza
York Hall
Challenger Hall
Beagle Hall
Atlantis Hall
Galbraith Hall
Discovery Hall
Meteor Hall
Galathea Hall
Revelle College Provost Office
Che Café
Mandell Weiss Forum

400 200 0 400 Feet

Scale: 1:4,800; 1 inch = 400 feet

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Source: UC San Diego 2018, ARG 2025

HELIX Environmental Planning

Built Environment Resources

Figure 3.4-1b



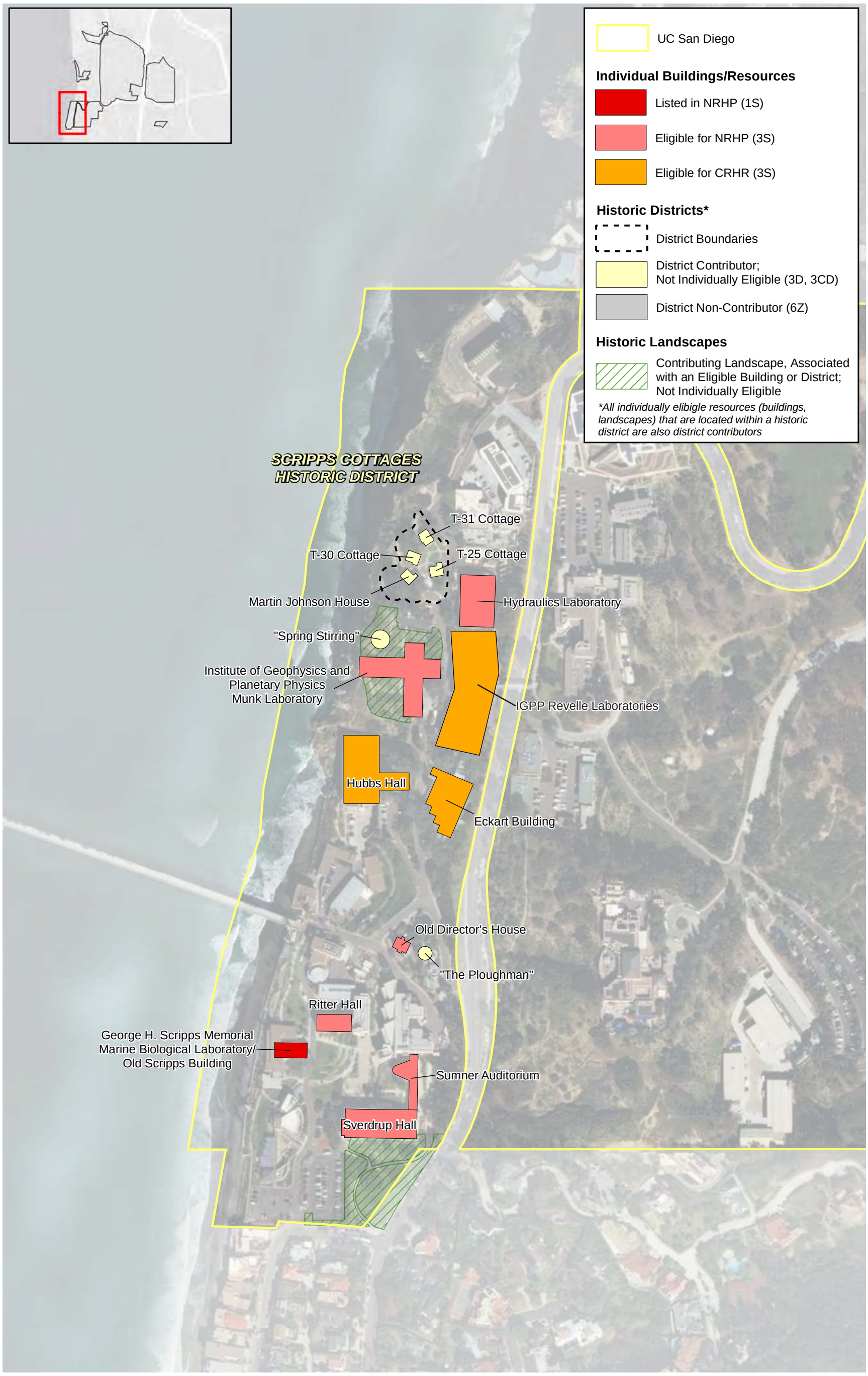
Source: UC San Diego 2018

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HELIX Environmental Planning

Built Environment Resources

Figure 3.4-1c



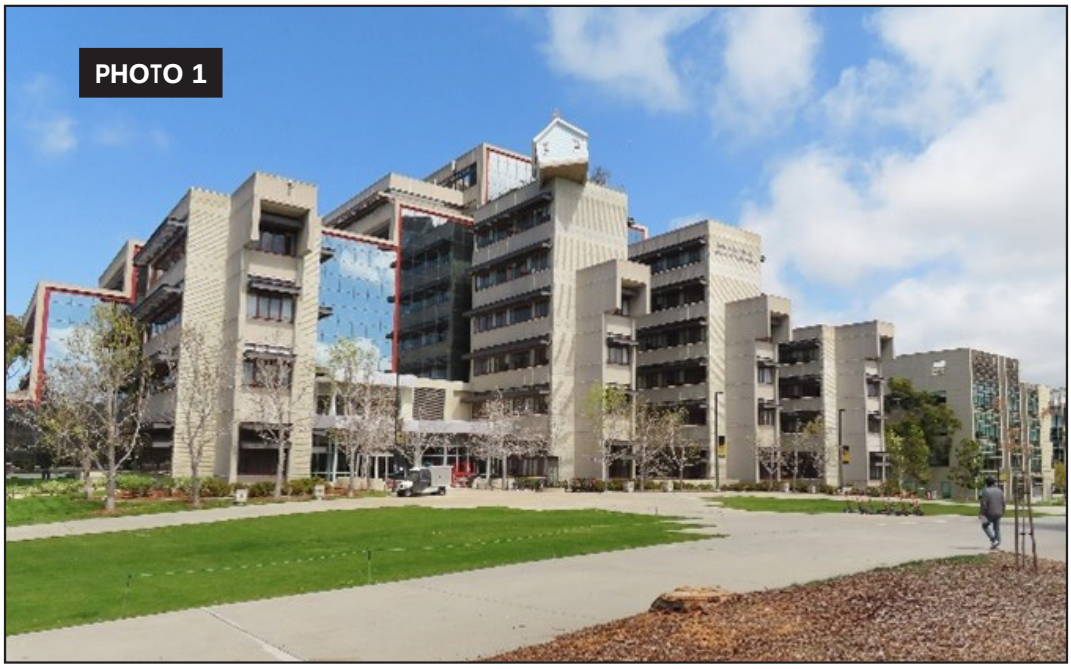
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Source: UC San Diego 2018, ARG 2025

HELIX Environmental Planning

Built Environment Resources

Figure 3.4-1d





Source: ARG 2025

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HELIX Environmental Planning

Irwin Mark and Joan Klein Jacobs Engineering Hall

Figure 3.4-2a





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Source: ARG 2025

HELIX Environmental Planning

George Palade Laboratories for Cellular and Molecular Medicine

Figure 3.4-2b





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Source: ARG 2025

HELIX Environmental Planning

Robinson Building Complex

Figure 3.4-2c





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Source: ARG 2025

HELIX Environmental Planning

Mandell Weiss Forum

Figure 3.4-2d





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Source: ARG 2025

HELIX Environmental Planning

Visual Arts Facility

Figure 3.4-2e





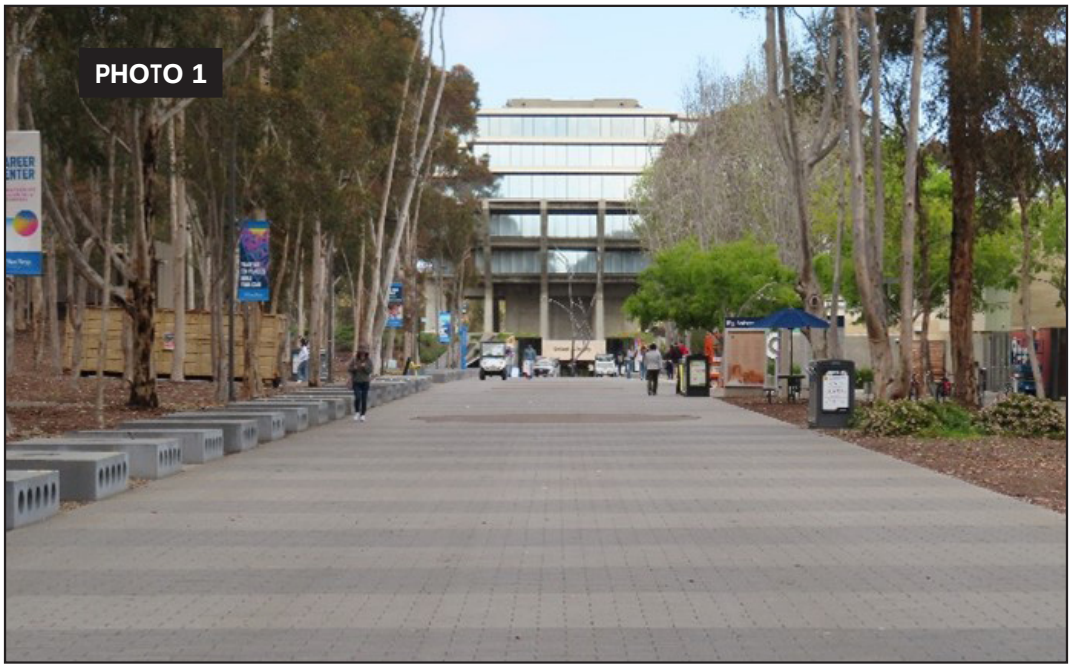
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Source: ARG 2025

HELIX Environmental Planning

IGPP Revelle Laboratories

Figure 3.4-2f





I:\PROJECTS\U\UCSanDiego_00888\00076_LRDPUpdate\Map\SEIR\Fig3.4-2g_LibWalk.indd 00888.76.1 11/11/2024 - SAB

Source: ARG 2025

HELIX Environmental Planning

Library Walk

Figure 3.4-2g

Irwin Mark and Joan Klein Jacobs Engineering Hall

Jacobs Engineering Hall is a six-story laboratory and office building that anchors the west end of the Warren Mall on the West Campus. The building was constructed in 1988 and is a late example of the Brutalist style.

The building is individually eligible for listing in the California Register under Criterion 3, for embodying distinctive characteristics of the Brutalist style as applied to an institutional setting and exhibiting a high quality of design through distinctive features. Notable features include its complex massing comprising intersecting rectilinear volumes, flat roof with modulating heights and no eaves, unfinished concrete exterior walls, and horizontal bands of flush-mounted metal windows.

George Palade Laboratories for Cellular and Molecular Medicine

The George Palade Laboratories for Cellular and Molecular Medicine is a three-story laboratory and office building located at the northwest corner of the Health Sciences district on the West Campus. The building consists of two connected wings which collectively form a U-shape and open into a south-facing courtyard. The west wing was constructed in 1990, and the east wing is an addition that was constructed in 1995; both sections of the building are designed in the Postmodern style.

The building is individually eligible for listing in the California Register under Criterion 3, for embodying distinctive characteristics of the Postmodern style and exhibiting a high quality of design through distinctive features. Notable features include its eclectic appearance, variety of exterior colors and textures, and abstracted decorative details referencing earlier architectural periods including pilasters, quoins, cornices, and colonnades. The building is an important local work of the firm Moore Ruble Yudell Architects and Planners and is notably one of the final projects designed by pioneering Postmodern architect Charles Moore before his death in 1993. The evaluation pertains to the original (1990) west wing and the later (1995) east wing. Both were designed by Moore Ruble Yudell and are nearly identical in terms of form, massing, and appearance.

Robinson Building Complex

The Robinson Building Complex consists of three adjacent buildings located to the north of Marshall College and to the east of Roosevelt College, in the northwest section of the West Campus. The buildings are occupied by various uses including a library, an auditorium, and a classroom/office building, all of which are associated with the Graduate School of International Relations and Pacific Studies. All were built as a singular unit in 1990 and are designed in the Postmodern style.

The complex of buildings is eligible for listing in the California Register under Criterion 3, for embodying distinctive characteristics of the Postmodern style and exhibiting a high quality of design through distinctive features. Notable features include its asymmetrical massing, fragmented building forms, and application of traditional building materials, notably Jerusalem stone wall cladding, which helps to soften the rigidity of the buildings' massing and form.

Mandell Weiss Forum

The Mandell Weiss Forum is a one-story theater building located in the Theatre District, near the southwest corner of the West Campus. The building has an irregular plan comprising multiple intersecting geometric volumes, and is partially obscured from view by a dramatic, 270-foot-long mirrored wall. The building was constructed in 1990 and is designed in the Postmodern style.

The building is individually eligible for listing in the California Register under Criterion 3, for embodying distinctive characteristics of the Postmodern style and exhibiting a high quality of design through distinctive features. Notable features include its eclectic appearance, asymmetrical and rounded building forms, and long mirrored exterior wall, which is juxtaposed against the building's otherwise monolithic surfaces and provides a sense of theatricality. The building is an important local work of architect Antoine Predock, well known for his eclectic synthesis of architectural influences and a characteristically unpredictable aesthetic associated with Postmodernism.

Visual Arts Facility

The Visual Arts Facility is a complex of six adjacent buildings located in the University Center area of the West Campus. The buildings house studios and various other support spaces for the Department of Visual Arts. All were built as a singular unit in 1993 and are designed in a variant of the Postmodern style known as Deconstructivist architecture.

The complex is individually eligible for listing in the California Register under Criterion 3, for embodying distinctive characteristics of Deconstructivist architecture, and exhibiting a high quality of design through distinctive features. Notable features include structural expression and intersecting volumes, eclectic and seemingly unpredictable roof forms, and the use of vernacular building materials like cinder blocks for exterior finishes. The building was designed by a consortium of architects including the firm Neptune-Thomas-Davis and Rebecca Binder. Binder, a graduate of UCLA, is notable for her contributions to Southern California's Postmodern/Deconstructivist movements, and for her experimental approach to architecture in the late twentieth century.

IGPP Revelle Laboratories

The IGPP Revelle Laboratories, located on the SIO campus, consists of four adjacent laboratory buildings and a pedestrian bridge that crosses La Jolla Shores Drive. All four buildings and the bridge were constructed as a singular unit in 1993. The complex is a late example of the Post-and-Beam style of architecture, designed to be contextual with the post-and-beam aesthetic of the adjacent IGPP Munk Lab built in 1964.

The complex of buildings is individually eligible for listing in the California Register under Criterion 3, for embodying distinctive characteristics of the Post-and-Beam style as applied to an institutional setting and exhibiting a high quality of design through distinctive features. Notable features include the buildings' structural expression, post-and-beam construction, flat roofs with projecting eaves, and unfinished timber exterior walls. The complex is a successful example of contextual architecture. It is also significant under Criterion 3 as an important work of architect Frederick Liebhardt, who designed many of the early buildings at UC San Diego during its formative period of development in the mid-twentieth century. Liebhardt is recognized as a master architect by the City of San Diego.

Library Walk

Library Walk is a designed landscape located in the University Center area of the West Campus. The designed landscape consists of a 0.25-mile-long axial pedestrian promenade connecting the Geisel Library, the Price Center and other student services facilities, and the Health Sciences district. The

promenade was constructed in 1995 and is a late example of Modern landscape architecture principles. It is an iconic and unifying element of UC San Diego's La Jolla campus.

The resource is individually eligible for listing in the California Register under Criterion 3, in the area of Landscape Architecture, for embodying distinctive characteristics of Modern landscape architecture principles as expressed in the context of late twentieth century landscape design. Notable features include the promenade's simple form and axial orientation, alternating bands of charcoal and pewter-colored concrete pavers, and 6-foot by 6-foot illuminated concrete pedestals flanking the west side of the promenade. It is also significant under Criterion 3 as an important work of Peter Walker William Johnson and Partners, a renowned landscape architecture firm.

3.4.2 REGULATORY FRAMEWORK

As discussed in the 2018 LRDP EIR, the treatment of cultural resources is governed by federal and state laws and guidelines. There are specific criteria for determining whether prehistoric and historic sites or objects are significant and/or protected by law. Federal and state significance criteria generally focus on the resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet federal significance criteria may be considered significant under state criteria. The laws and regulations seek to mitigate impacts on significant prehistoric or historic resources. See Section 3.4.2 of the 2018 LRDP EIR for applicable federal and state regulations. The following section focuses on updated regulations and guidance that has occurred since certification of the 2018 LRDP EIR.

California Environmental Quality Act Guidelines

In 2018, the CEQA Guidelines were updated within the Cultural Resources section of Appendix G to refine the evaluation of historical, archaeological, and paleontological resources. Previously, Appendix G grouped these resources together under Cultural Resources; with the change in 2018, the topic of paleontological resources was relocated to the Geology and Soils section. Additionally, the 2018 update introduced a separate section for Tribal Cultural Resources, recognizing the unique cultural significance of resources important to California Native American tribes and importance of evaluating impacts separately from other cultural resources.

3.4.3 PROJECT IMPACTS AND MITIGATION

3.4.3.1 ISSUE 1 — HISTORICAL RESOURCES (BUILT ENVIRONMENT)

Cultural Resources Issue 1 Summary

Would implementation of the Update to the 2018 LRDP cause a substantial adverse change in the significance of a historical resource?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation or significant and unavoidable, depending on the type of historic resource and extent of the impacts.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation or significant and unavoidable, depending on the type of historic resource and extent of the impacts.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Analysis of individual projects for potential impacts to specific historical resources; avoidance through compliance with the Secretary of the Interior's Standards for Rehabilitation (Cul-1A); project redesign (Cul-1B); HABS/HALS documentation (Cul-1C); relocation (Cul-1D); interpretation/ commemoration (Cul-1E); registration (Cul-1F); and/or salvage (Cul-1G).

Summary of Analysis in the 2018 LRDP EIR

Section 3.4.3.1 of the 2018 LRDP EIR concluded that if a project associated with the 2018 LRDP involved alterations or modifications to a historical resource, and the scope of work conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995) ("Secretary of the Interior's Standards for the Treatment of Historic Properties"), specifically the

Standards for Rehabilitation, it was presumed that no impacts would occur to historical resources, and no additional review were required for purposes of CEQA.

Pursuant to the 2018 LRDP EIR mitigation framework, if a project involves alterations or modifications to a historical resource, and the proposed scope of work did not conform to the Standards, it is required to be evaluated to determine whether impacts to the resource's significance can be mitigated to a level of less than significant. To be effective, mitigation must lessen the physical impact that the project would have on the historical resource, often through redesigning the project to eliminate its "objectionable or damaging aspects" (e.g., retaining rather than removing a character-defining feature, or reducing the size or massing of a proposed addition). Generally, CEQA considers a project to be mitigated to a level of less than a significant impact on a historical resource when a project follows the Secretary of the Interior's Standards for the Treatment of Historic Properties (Guidelines, section 15064.5[b][3].) Demolition was generally considered an unavoidable adverse impact that cannot be mitigated to a level of less than significant, and the 2018 LRDP EIR concluded that because implementation of the 2018 LRDP EIR could result in the demolition and/or substantial alteration of historic structures and/or districts, a significant and unavoidable impact would result.

Mitigation measures included: analysis of individual projects for potential impacts to specific historical resources and avoidance through compliance with the Secretary of the Interior's Standards for Rehabilitation (Cul-1A); project redesign (Cul-1B); Historic American Buildings Survey (HABS)/Historic American Landscape Survey (HALS) documentation (Cul-1C); relocation (Cul-1D); interpretation/ commemoration (Cul-1E); registration (Cul-1F); and/or salvage (Cul-1G).

Implementation of standard mitigation measures Cul-1A through Cul-1B were concluded to reduce impacts to historical resources to below a level of significance. Cul-1C and Cul-1D were identified for projects that would result in the alteration of historic resource(s) that cannot be mitigated through Secretary of the Interior Standards compliance described in Cul-1A and Cul-1B, and the impacts were considered significant and unavoidable. Supplemental mitigation measures Cul-1E through Cul-1G were to be applied in addition to the standard mitigation programs for individual projects, as deemed appropriate, depending on the extent of the project impacts. However, implementation of supplemental mitigation measures Cul-1E through Cul-1G would not reduce significant impacts to below a level of significance. Therefore, depending on the type of historic resource and extent of the impacts, the 2018 LRDP EIR determined that impacts would either be less than significant with mitigation or significant and unavoidable.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes increases in development projections that could cause adverse changes in the significance of historical resources on campus due to activities associated with new construction.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Following the adoption of the 2018 LRDP, additional resources became eligible for listing in the NRHP and/or the CRHR. This SEIR therefore conducts an updated analysis to take the additional resources into consideration.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines. Under CEQA, built environment and archaeological resources (both historic and prehistoric) may qualify as historical resources under CEQA (Guidelines, section 15064.5[c][1].) However, for clarity of this discussion, built environment resources are addressed under Issue 1, and archaeological resources are addressed under Issue 2 in Section 3.4.3.2.

The CEQA Guidelines state that a "substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." (Guidelines, section 15064.5[b][1].) Under Guidelines section 15064.5, subdivision (b)(2), a resource is considered "materially impaired" if it:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or

- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources…or its identification in a historical resources survey…unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- Demolishes or materially impairs in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

CEQA requires a lead agency to identify measures to mitigate significant adverse impacts to historical resources. The CEQA Guidelines state that "the lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures" deemed prudent and feasible. (Guidelines, section 15064.5[b][4].)

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The following analysis is based on the UC San Diego LRDP Historical Resources Technical Report, and the Supplement to the UC San Diego LRDP Historical Resources Technical Report prepared by ARG, which analyzed seven new resources that became eligible for listing under NRHP and/or CRHR since certification of the 2018 LRDP EIR. The resources determined to be eligible are listed above in Table 3.4-2.

Impact Analysis

Implementation of the Update to the 2018 LRDP has the potential to impact historical (built environment) resources within the campus. These potential impacts would result from the following categories of projects:

1. Renovation and modification of existing historical resources to some extent to ensure that they continue to serve a useful function. Given their age, these resources may also likely require maintenance, repairs, and/or safety and accessibility upgrades.
2. Targeted redevelopment or demolition of existing historical resources, potentially involving the removal of some that pose life-safety risks, underuse their respective site, and/or are considered obsolete and beyond their useful life.
3. Construction of new, purpose-built buildings and facilities throughout the campus that are sited adjacent to historical resources.

Impacts to historical resources are evaluated by determining the potential for development to affect the integrity and character-defining features of historical resources. Given the proposed Update to the 2018 LRDP is a plan and does not evaluate specific projects, projects undertaken as part of the implementation of the Update to the 2018 LRDP would be evaluated in accordance with CEQA's subsequent review standards. Development improvements currently being proposed under the Update to the 2018 that would potentially impact known historical resources are described below under "Demolition Projects." Note that the proposed changes to the land use designations do not constitute a potential impact.

Renovation Projects

Implementation of the Update to the 2018 LRDP could require the renovation of existing buildings and facilities to meet the stated project goals. Renovation projects may include, but are not necessarily limited to, the following:

- Retrofitting teaching and research spaces to meet contemporary standards
- Infrastructure systems upgrades
- Americans With Disabilities Act (ADA)-related improvements
- Energy efficiency improvements (including window replacements)
- Change in use of space (e.g., classroom converted to group learning area)
- Repurposing of an existing building to accommodate a new use
- Additions to an existing building
- Removal of additions or modifications that occurred outside of the building's period of significance
- Structural or seismic retrofitting
- Improvements to landscape or hardscape features that are considered to be character-defining features of an eligible or designated historical building

Renovation projects such as these have the potential to impact historical resources as follows:

- Character-defining features and spaces that characterize a resource may be altered or removed.
- Extensive alterations to a resource may be needed to accommodate a change of use.
- New additions to a resource may be incompatible with its bulk, scale, massing, height, or style.

If the extent of alterations is such that a historical resource is no longer eligible for inclusion in the California Register, then the project would "materially impair" the historical resource per 15064.5(b)(2) of the CEQA Guidelines and would result in a significant impact to the resource.

Demolition Projects

Demolition projects may include, but are not necessarily limited to, the following:

- An eligible historical resource is demolished or removed.

- An associated site or landscape feature – such as a designed landscape, hardscape element, or public art installation – associated with a historical resource is demolished or removed.

Demolition is generally considered to be an unavoidable adverse impact that cannot be mitigated to a level of less-than-significant. Thus, if an individual historical resource is demolished as part of the Update to the 2018 LRDP, then that action would result in a significant unavoidable impact.

Based on the development improvements being proposed under the Update to the 2018 LRDP, several historical resources identified on campus have the potential to be demolished. Those include, but are not limited to:

- Medical Teaching Facility
- Main Gym and Natatorium
- Rec Gym (district contributor)
- Sumner Auditorium
- Camp Matthews Sentry Booth
- University Center Building 409

New Construction Projects

New construction associated with implementation of the Update to the LRDP may include, but is not necessarily limited to, the following:

- New construction in the vicinity of an individually eligible resource may be incompatible with the historical resource in terms of bulk, scale, massing, height, and/or style.

The UC San Diego campus contains an eclectic mix of buildings of different architectural styles, and new construction near or adjacent to an historical resource does not necessarily create a significant impact. However, if adjacent new construction impairs a historical resource's integrity of setting, feeling, and association in such a way that the historical resource is no longer eligible for inclusion

in the California Register, then the project would "materially impair" the historical resource per 15064.5(b)(2) of the CEQA Guidelines and would result in a significant impact to the resource.

Historic Designed Landscapes

Implementation of the Update to the 2018 LRDP would also have the potential to modify or alter historic designed landscapes, including, but not limited to the following:

- Removal and/or replacement of landscape and hardscape features that contribute to the character and significance of a designed landscape.
- Introduction of new non-original landscape and hardscape features into a designed landscape.
- Encroachment upon designed landscapes to accommodate new construction or other projects associated with the Update to the 2018 LRDP.

If the extent of alterations is such that a designed landscape would no longer be eligible for inclusion in the California Register, then the project would "materially impair" the historical resource per 15064.5(b)(2) of the CEQA Guidelines and would result in a significant impact to the resource.

Level of Significance Before Mitigation

Impacts to historical resources would be potentially significant, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Standard Mitigation Measures

The following measures apply to projects involving substantial adverse impacts to historical resources, identified as part of the 2018 LRDP EIR or the Update to the 2018 LRDP SEIR.

Cul-1A **Compliance with the Standards**. When a development project is initiated, UC San Diego shall first determine, as early as possible in the planning process, whether the project may have a substantial adverse impact on a historical resource (individual resource, district, or landscape) based on information contained in this SEIR and its appendices. If the project may result in impacts to an individual historical resource, then UC San Diego shall retain the services of a qualified historic architect. The UC San Diego-retained historic architect shall be tasked with determining whether the project meets the Secretary of the Interior's Standards for Rehabilitation, as defined in 36 CFR Part 67.7 as described below.

i. The consultant shall evaluate the project and prepare a memorandum or equivalent level of documentation indicating whether the project meets the Standards. If the project meets the Standards, then any potential impacts are presumed fully mitigated per the CEQA Guidelines, and no additional action is necessary.

ii. If a project involving historical resources does not meet the Standards, then UC San Diego shall attempt to bring the project into compliance with the Standards. UC San Diego shall consider means of reducing the impact to a level of less than significant by redesigning or modifying the project, or undertaking other measures deemed feasible and prudent to meet the Standards as noted below in Cul-1B.

Cul-1B **Project Redesign.** For projects involving historical resources that do not comply with the Standards, UC San Diego shall consider means of reducing the impact to a level of less than significant by redesigning the project or undertaking other measures deemed feasible and prudent.

i. If the project can be redesigned to meet the Standards, then any potential impacts are presumed to be fully mitigated per the CEQA Guidelines, and no additional action is necessary.

ii. If the project cannot be redesigned to meet the Standards, then UC San Diego shall apply the appropriate series of mitigation measures depending on the resource type to lessen the impact(s) to the historical resource; however, impacts would be considered significant and unavoidable.

Measures for Non-Compliance with Standards

The following measures shall be applied to all projects that result in the alteration of historic resource(s) that cannot be mitigated through Standards compliance described in Cul-1A and Cul-1B, and the impacts would be considered significant and unavoidable:

Cul-1C **HABS or HALS Documentation.** If a project undertaken as part of implementation of the Update to the 2018 LRDP would result in the unavoidable demolition or alteration of a historical resource that cannot be mitigated through Standards compliance, then UC San Diego shall prepare archival Historic American Buildings Survey (HABS) or Historic American Landscape Survey (HALS) Level I documentation, as appropriate, for any historical resource that would be impacted by the project. Documentation of the existing conditions shall be undertaken prior to the commencement of construction. If requested, copies of HABS/HALS documentation shall be provided to the La Jolla Historical Society, the San Diego History Center, and other interested parties to be identified.

HABS or HALS Level I documentation may consist of the following:

- architectural and historical narrative;
- archival drawings;
- if adequate archival drawings are not available, measured drawings would be produced; and
- large-format photography.

Cul-1D **Relocation**. If a project would result in the unavoidable demolition or removal of a historical resource, then UC San Diego shall consider relocating the historical resource to an appropriate receiver site, if any such site is available. When considering relocation, UC San Diego shall take into account the importance of setting to the significance of the historical resource; whether the proposed receiver site is compatible with the character and significance of the historical resource being considered for relocation; and whether the resource will retain its eligibility

for the CRHR subsequent to its relocation. For historic district contributors, the receiver site should fall within the district boundaries to retain the associative qualities between the contributor and the district within which it is located.

Supplemental Measures

Supplemental mitigation measures (Cul-1E, Cul-1F, and Cul-1G) shall be applied in addition to the aforementioned standard mitigation programs for individual projects, as deemed appropriate, depending on the extent of the project impacts (i.e., should a project result in an impact to a historical resource that cannot otherwise be mitigated to a level of less than significant). The need for additional mitigation measures shall be determined on a project-specific basis and may require input from a qualified historic architect. Nonetheless, implementation of these supplemental mitigation measures would not reduce significant impacts to below a level of significance.

Cul-1E **Interpretation/Commemoration.** If a project would substantially alter a historical resource, then UC San Diego shall prepare an interpretive plan for the La Jolla Campus, a district/neighborhood, or a specific building/use focusing on its architectural and developmental legacy. This plan shall be used as part of community outreach efforts and on-campus orientation and tours. Interpretive displays in the public areas of significant buildings, landscapes, and sites shall be considered and installed as deemed appropriate.

Cul-1F **Registration**. If a project would substantially alter a historical resource, then UC San Diego shall nominate another historical resource that is eligible for the NRHP or CRHR to the appropriate registration program. UC San Diego shall nominate a resource that shares similar contextual qualities to the resource that is being significantly impacted by the project.

Cul-1G **Salvage**. If a project would substantially alter a historical resource, then UC San Diego, through careful methods of deconstruction to avoid damage and loss, shall salvage character-defining features and materials for educational and interpretive purposes on campus, or for reuse in new construction on campus in a way that interprets and commemorates their original use and significance.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

No new or revised mitigation measures are required.

Level of Significance After Mitigation

Implementation of mitigation measures Cul-1A through Cul-1B would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

Similar to the 2018 LRDP EIR, implementation of standard mitigation measures Cul-1A through Cul-1B would reduce impacts to historical resources to below a level of significance.

Cul-1C and Cul-1D would apply to projects that would result in the alteration of historic resource(s) that cannot be mitigated through Secretary of the Interior Standards compliance described in Cul-1A and Cul-1B, and the impacts would be considered significant and unavoidable.

Supplemental mitigation measures Cul-1E through Cul-1G are required in addition to the standard mitigation programs for individual projects, as deemed appropriate, depending on the extent of the

project impacts. However, implementation of supplemental mitigation measures Cul-1E through Cul-1G would not reduce significant impacts to below a level of significance.

3.4.3.2 ISSUE 2 — ARCHAEOLOGICAL RESOURCES

Cultural Resources Issue 2 Summary

Would implementation of the Update to the 2018 LRDP cause substantial adverse change in the significance of an archaeological resource?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts thank 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Identification of resources in Area of Potential Effects and evaluation of significance (Cul-2A); avoidance (Cul-2B); documentation and treatment (Cul-2C); procedures for unknown resources (Cul-2D); and Cultural Resources Construction Monitoring Protocol (Cul-2E).

Summary of Analysis in the 2018 LRDP EIR

Section 3.4.3.2 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP could result in a substantial adverse change in the significance of recorded archaeological resources and unrecorded subsurface archaeological resources. Mitigation measures included the following: identification of resources in Area of Potential Effects and evaluation of significance (Cul-2A); avoidance (Cul-2B); documentation and treatment (Cul-2C); procedures for unknown resources (Cul-2D); and construction monitoring (Cul-2E). Implementation of mitigation measures Cul-2A through Cul-2E would reduce impacts to archaeological resources to below a level of significance.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes increases in development projections that could cause adverse changes in the significance of recorded archaeological resources or unrecorded subsurface archaeological resources due to ground disturbance associated with new construction. Projects

developed under the Update may impact areas not previously contemplated for development in the2018 LRDP.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Following the adoption of the 2018 LRDP, numerous cultural resources studies and monitoring have occurred; three of these projects within the campus boundaries resulted in the identification of previously undocumented cultural resources.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.

For purposes of this SEIR, implementation of the Update to the 2018 LRDP may have a significant adverse impact on archaeological resources if it would:

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines; or

- Disturb any human remains, including those interred outside of formal cemeteries (e.g., at historic homesteads, as part of archaeological habitation site, etc.).

"Unique archaeological resources" are defined under CEQA through PRC Section 21083.2(g). A unique archaeological resource implies an archaeological artifact, object, or site about which it can be clearly demonstrated that there is a high probability that it meets one of the following criteria:

- The archaeological artifact, object, or site contains information needed to answer important scientific questions and there is a demonstrable public interest in that information, or

- The archaeological artifact, object, or site has a special and particular quality, such as being the oldest of its type or the best available example of its type, or

- The archaeological artifact, object, or site is directly associated with a scientifically recognized important prehistoric or historic event or person.

For a resource to qualify as a unique archaeological resource, overcoming the presumption of non-uniqueness, the agency must determine that there is a high probability that the resource meets one of these criteria without merely adding to the current body of knowledge (PRC Section 21083.3[g]). An archaeological artifact, object, or site that does not meet the above criteria is a non-unique archaeological resource (PRC Section 21083.2[h]). An impact on a non-unique resource is not a significant environmental impact under CEQA (PRC Section 21083.2[a], [h]; CEQA Guidelines Section 15064.5[c][4]). This distinction separates the applicable standards for assessing and mitigating impacts to archaeological resources from the applicable standards for assessing and mitigating impacts to tribal cultural resources, discussed below. If an archaeological resource

qualifies as a historical resource under CRHR criteria, then the resource is treated as a historical resource for the purposes of CEQA.

Under CEQA, a tribal cultural resource may also be an archaeological resource. "A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of [PRC Section 21074,] subdivision (a)" (PRC Section 21074[c]). Different standards of assessing and mitigating impacts apply to tribal cultural resources than to archaeological resources. The standards for tribal cultural resources are discussed in greater depth in section 3.11, Tribal Cultural Resources. One key difference between the applicable standards is that the presumption of "non-uniqueness" for archaeological resources under PRC Section 21083.3[g] does not apply when assessing the significance of an impact to a tribal cultural resource.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The following analysis is based on the Archaeological Resources Report prepared for the 2018 LRDP EIR (Jow and Cooley 2018), as well as the Addendum to the Archaeological Resources Report (Turner and Robbins-Wade 2024) which conducted an additional field survey and records search in addition to an examination of the cultural resource studies and monitoring programs that have occurred following adoption of the 2018 LRDP.

Impact Analysis

As noted previously, multiple cultural resource studies and monitoring programs have been conducted following the Update to the 2018 LRDP. While the majority of these studies and monitoring programs have been negative for cultural resources, three projects resulted in the identification of previously unrecorded subsurface cultural resources, and some previously known sites were reidentified. The Update proposes minor changes to the 2018 LRDP predominant land use designations, as described in Section 2.4.1 and shown in Figures 2-3 and 2-4 of this SEIR. The Update to the 2018 LRDP projects an increase in land use development intensity compared to the projections outlined in the 2018 LRDP. The increased density would occur within the West and East Campuses, resulting in an anticipated increase in mass and height of future development in these locations and some redevelopment into areas that were not previously anticipated for redevelopment in the 2018 LRDP EIR. Only two undeveloped areas of the existing Open Space Preserve that were not identified for development in the 2018 Archaeological Resources Report are now proposed for development, as described below.

AECOM produced a series of recommendations based on the significance or status of each of the resources within the campus boundaries (refer to Table 3.4-1 of the 2018 LRDP EIR). No further work was proposed for those resources that have been destroyed, or those determined to not be significant by previous investigations; potentially significant resources would require testing for significance, and preservation in place or data recovery programs are recommended for resources with known significance. Based on the results of the studies that occurred after the 2018 LRDP EIR was published, as well as the few discoveries that have occurred during that time, these recommendations would remain the same for the Update to the 2018 LRDP.

Under the Update, two undeveloped areas within the existing Open Space Preserve that were not surveyed in the 2018 Archaeological Resources Report are now proposed for development of an electrical substation, potential wastewater treatment plant or other facilities or infrastructure that may be needed on campus. Therefore, these areas were the subject of a cultural resource survey conducted in October 2024 for the Addendum to the Archaeological Resources Report (Turner and Robbins-Wade 2024). Although one previously recorded resource was mapped as extending into one of these parcels, the site was not reidentified during the recent survey, apparently due to thick vegetation affecting ground visibility. Per mitigation measure Cul-2A identified in the 2018 LRDP EIR and in the 2018 Archaeological Resources Report, archaeological testing would be required for this site prior to approval of a specific development project, to assess site significance and the potential need for additional avoidance, treatment, or other mitigation measures.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Recorded Archaeological Resources

Cul-2A Evaluation. As early as possible in the project planning process, UC San Diego shall define the project's Area of Potential Effects (APE) for archaeological resources based on the extent of ground disturbance and site modification anticipated for the project. If, based on the APE, it is determined that the project may affect a recorded significant or potentially significant archaeological resource, then UC San Diego shall implement the measures listed below. When determining if a project may affect a recorded archaeological resource that has undefined boundaries, a buffer of appropriate size for the resource shall be considered.

i. If the resource or a portion thereof has been determined to be significant, UC San Diego shall implement mitigation measure Cul-2B;

ii. If a determination has not been made regarding the resource's significance (or a portion thereof), the locus shall be evaluated by a qualified UC San Diego-retained archaeologist through testing and other appropriate means, who will determine if it qualifies as a unique archaeological resource under the criteria of CEQA Guidelines Section 15064.5. This evaluation shall also determine the extent of the resource, if not already established. The qualified archaeologist shall be responsible for submitting appropriate records to the SCIC at San Diego State University and the San Diego Museum of Us.

Cul-2B Avoidance. If a project is anticipated to impact a significant (unique) archaeological resource, UC San Diego shall consult with the qualified archaeologist to consider means of avoiding or reducing ground disturbance within the site boundaries, including minor modifications of building footprint, landscape modification, the placement of protective fill, or other means that will permit avoidance or substantial preservation in place of the resource. If the project cannot avoid ground disturbance within the site boundaries, UC San Diego shall implement mitigation measure Cul-2C.

Cul-2C Documentation and Treatment. For a project anticipated to impact a significant (unique) archaeological resource under measure Cul-2A, and where avoidance is not feasible, a qualified archaeologist, in consultation with UC San Diego, shall:

i. Prepare a research design and archaeological data recovery plan for the recovery that will capture those categories of data for which the site is significant, and implement the data recovery plan prior to or during development of the site.

ii. If the site contains human remains, as part of the data recovery, consultation with the appropriate parties such as the Medical Examiner, Native American Heritage Commission (NAHC), Most Likely Descendant (MLD), Kumeyaay, and/or Museum of Us, shall be conducted. Such consultation may include a pre-excavation agreement with the MLD.

iii. Perform appropriate technical analyses, prepare a full written report and file it with the SCIC, and provide for the permanent curation of recovered materials.

iv. If, in the opinion of the qualified archaeologist and in light of the data available, the significance of the site is such that data recovery cannot capture the values that qualify the site for inclusion on the CRHR, the campus shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the site to be preserved intact, such as project redesign, placement of fill, or project relocation or abandonment.

Revised mitigation measures for the Update to the 2018 LRDP:

Measures Cul-2D and Cul-2E have been revised (as shown below in strikeout/underlined text) to reflect the involvement and input of Kumeyaay Tribes and the KCRC, which had not been included in the 2018 LRDP. In addition, a Cultural Resources Monitoring, Discovery, and Treatment Plan for the Update to the UC San Diego La Jolla Campus 2018 Long Range Development Plan (Plan) is being developed in consultation with the three Kumeyaay Tribes who consulted on the Update under AB 52 (Campo Band of Mission Indians, the San Pasqual Band of Mission Indians, and the Sycuan Band of the Kumeyaay Nation). The Plan outlines how individual projects would comply with mitigation measures Cul-2A, Cul-2B, Cul-2C, Cul-2D, and Cul-2E, as presented here. A draft of the Plan is included as Appendix D2 to this SEIR; however, it is still subject to review and confirmation by the Consulting Tribes (see Section 3.11 and Table 3.11-1). Some revisions to Cul-2D and Cul-2E reflect an effort to separate the requirement for cultural resources surveys from monitoring requirements.

Previously Unrecorded Archaeological Resources

Cul-2D Unknown Resources. For areas between recorded sites ("unknown resources") the following shall apply. If a project is proposed:

i. ~~*SIO.* If a project is proposed in:~~

~~a. a previously developed site, the prior grading plans shall be viewed to determine if prior grading activity has removed two or more feet of soil.~~

~~• If two or more feet of soil have been previously removed, no further work is required.~~

- ~~If not, a qualified archaeologist shall monitor grading activities during the removal of the top two to three feet of soil.~~
- ~~If the project site is within an area of natural deposition, then a qualified archaeologist shall monitor all grading activities.~~

~~b. a previously undeveloped area, a qualified archaeologist shall monitor grading activities during the removal of the top two to three feet of soil on mesas, cliffs, and other flat areas, and during all grading activities within areas of natural deposition.~~

~~ii. *West Campus and East Campus*. If the project is proposed:~~

i. In an area of natural deposition ~~and is adjacent to recorded sites~~, a qualified archaeologist and a Native American Monitor shall monitor all grading activities.

~~b. on a mesa top in a previously developed site (including parking lots, utility corridors, eucalyptus grove reserve, recreation fields, ornamental landscaping) and if previously recorded sites are adjacent, the prior grading plans shall be viewed to determine if prior grading activity has removed two or more feet of soil.~~

~~If two or more feet of soil have been previously removed, no further work is required.~~

~~If not, a qualified archaeologist shall monitor grading activities during the removal of the top two to three feet of soil.~~

ii. On a mesa top in an undeveloped area of the campus, a cultural resource survey shall be completed by a qualified archaeologist and Native American Monitor as part of the project-specific CEQA document (i.e., during schematic design).

- If ground visibility is good and the survey is negative, no additional work is required.
- If ground visibility is poor due to high grasses/brush, a CEQA mitigation measure shall be included requiring a subsequent survey after brush removal is completed to confirm survey results. If the second survey is negative, no additional work is required.

iii. In all cases, if cultural resources are located during survey/monitoring activities described above, recommendations of the UC San Diego-retained qualified archaeologist and the Consulting Tribes shall be implemented in accordance with measures Cul-2A, Cul-2B, and Cul-2C, as described above.

~~e. In all cases, monitoring will cease if grading reaches underlying formational material (Lindavista [Very Old Paralic], Bay Point [Old Paralic], Scripps, Ardath Shale), regardless of how shallow or in what location it is found.~~

~~f. All monitoring shall be conducted in accordance with measure Cul-2E.~~

Cul-2E Cultural Resources Construction Monitoring Protocol.

Construction monitoring shall be implemented in accordance with the Cultural Resources Monitoring, Discovery, and Treatment Plan for the Update to the UC San Diego La Jolla Campus 2018 Long Range Development Plan and the following measures:

i. Prior to beginning any work that requires monitoring:

a. a preconstruction meeting shall be held that includes the qualified archaeologist, Native American Monitor, Project Manager and/or Grading Contractor, and other appropriate personnel so the archaeologist and Native American Monitor can make comments and/or suggestions concerning the cultural resources ~~archaeological~~ monitoring program to the Project Manager and/or Grading Contractor.

b. the qualified archaeologist, in consultation with the Native American Monitor, shall (at that meeting or subsequently) submit to the Project Manager a copy of the site/grading plan (reduced to 11 x 17 inches) that identifies areas to be monitored as well as areas that may require delineation of grading limits.

c. the archaeologist and the Native American Monitor shall also coordinate with the Project Manager on the construction schedule to identify when and where monitoring is to begin and including the start date for monitoring.

ii. The qualified archaeologist and the Native American Monitor shall be present during grading/excavation as detailed in Cul-2D and in the Cultural Resources Monitoring, Discovery, and Treatment Plan and shall document such activity on a standardized form. A record of activity shall be sent to the Environmental Planner and Project Manager each month.

iii. ~~Discoveries~~ In the event of a cultural resources discovery, the Discovery Protocol developed in consultation with the Consulting Tribes and presented in the Cultural Resources Monitoring, Discovery, and Treatment Plan shall be implemented. This includes diverting, directing, or temporarily halting activities in the area of the discovery in order to allow for an evaluation of the discovery.

~~a. Discovery Process – In the event of a discovery, and when requested by the qualified archaeologist, or the Archaeological Principal Investigator (PI) if the archaeological monitor is not qualified as a PI, the Environmental Planner and Project Manager shall be contacted and shall divert, direct, or temporarily halt ground-disturbing activities in the area of discovery to allow for preliminary evaluation of potentially significant archaeological resources. The PI shall also immediately notify Campus Planning of such findings at the time of discovery.~~

~~b. Determination of Significance – The significance of the discovered resources shall be determined by the PI in consultation with Campus Planning and the Native American Community, as appropriate. Campus Planning must concur with the evaluation before grading~~

~~activities will be allowed to resume. For archaeological resources considered significant by the PI, a Research Design and Data Recovery Program shall be prepared, approved by Campus Planning, and carried out to mitigate impacts before ground-disturbing activities in the area of discovery will be allowed to resume.~~

iv. If human remains are discovered, work shall halt in that area and the procedures detailed in the California Health and Safety Code (Section 7050.5) and the California PRC (Section 5097.98) and will be followed.

v. Notification of Completion – The qualified archaeologist shall notify Campus Planning, as appropriate, in writing of the end date of monitoring.

vi. Handling and Curation of Cultural Material ~~Significant Artifacts~~ and Letter of Acceptance

a. The qualified archaeologist shall ensure that all significant cultural remains collected are cleaned, catalogued, and either returned to the appropriate Consulting Tribe or permanently curated with an appropriate institution; that a letter of acceptance from the curation institution has been submitted to Campus Planning; that all artifacts and other cultural material are analyzed ~~to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species~~ in accordance with the Cultural Resources Monitoring, Discovery, and Treatment Plan; and that specialty studies are completed, as appropriate.

b. Curation or return of artifacts associated with the survey, testing, and/or data recovery for this project to the Tribe shall be completed in accordance with the Cultural Resources Monitoring, Discovery, and Treatment Plan ~~consultation with Campus Planning and the Native American representative, as applicable~~.

vii. Final Results Reports (Monitoring and Research Design and Data Recovery Program) – Prior to completion of the project, two copies of the Final Results Report (even if no significant resources were found) and/or evaluation report, if applicable, which describe the results, analysis, and conclusions of the archaeological monitoring program (with appropriate graphics) shall be submitted to Campus Planning and the Consulting Tribes for approval in accordance with the Cultural Resources Monitoring, Discovery, and Treatment Plan. For significant archaeological resources encountered during monitoring, the Research Design and Data Recovery Program shall be included as part of the Final Results Report.

viii. Recording Sites with State of California Department of Park and Recreation – The qualified archaeologist shall record (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program and submit such forms to the SCIC with the Final Results Report.

New mitigation measures for the Update to the 2018 LRDP:

No new mitigation measures are required.

Level of Significance After Mitigation

Implementation of mitigation measures Cul-2A through Cul-2E would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

3.4.3.3 ISSUE 3 — HUMAN REMAINS

Cultural Resources Issue 3 Summary

Would implementation of the Update to the 2018 LRDP disturb any human remains, including those interred outside of dedicated cemeteries?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts	Procedures for unknown resources (Cul-2D); and Cultural Resources Construction Monitoring Protocol (Cul-2E).

Summary of Analysis in the 2018 LRDP EIR

Section 3.4.3.4 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP could result in disturbance of human remains, including those interred outside of dedicated cemeteries. Mitigation measures included: identification of unknown resources (Cul-2D); and construction monitoring and compliance with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097.98 for inadvertent discoveries (Cul-2E). Implementation of these mitigation measures was determined to reduce the impacts of inadvertent discoveries of human remains to a less than significant level. In addition, mitigation measure Cul-5C required that all materials associated with a Tribal Cultural Resource, including human remains, be repatriated to the appropriate tribe.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes increases in development projections that could result in disturbance of human remains due to ground disturbance associated with new construction.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no changes with respect to circumstances under which the Update to the 2018 LRDP would be undertaken, and there is no new information of substantial importance that has become available relative to the disturbance of human remains.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would disturb any human remains, including those interred outside of dedicated cemeteries, per Section 15064.5 of the State CEQA Guidelines. Section 15064.5(d) and (e) of the CEQA Guidelines assign special importance to the treatment of human remains and items associated with Native American burials with dignity and specifies procedures to be used when Native American human remains are accidentally discovered or recognized. These procedures are detailed under PRC Section 5097.98 and Health and Safety Code Section 7050.5.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The following analysis is based on consultation with Native American tribes pursuant to AB 52, the Archaeological Resources Report prepared for the 2018 LRDP EIR (Jow and Cooley 2018), as well as the Addendum to the Archaeological Resources Report (Turner and Robbins-Wade 2025) which conducted an additional field survey and records search in addition to an examination of the cultural resource studies and monitoring programs that have occurred following adoption of the 2018 LRDP.

Impact Analysis

As discussed in Section 3.4.1.6 of the 2018 LRDP, human remains are known to occur on the UC San Diego campus, and known locations would be avoided during implementation of the Update to the 2018 LRDP. However, ground-disturbing construction activities could uncover human remains at locations where none have been previously identified. The Update to the 2018 LRDP proposes new development and building improvements involving construction activities that would disturb native terrain, including excavation, grading, and soil removal; therefore, the potential exists for previously undiscovered human remains to be discovered. Projects that result in substantial grading or excavations in undisturbed soils have the potential to impact archaeological resources that may contain human remains. If human remains are inadvertently discovered, the impact would be considered significant unless the appropriate procedures were implemented, as described below under “Mitigation Measures.”

California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Sections 7050.5 and 7052 and California PRC Section 5097.9.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Per updated mitigation measure Cul-2E, if human remains are discovered during any construction activities, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and UC San Diego shall notify the San Diego County coroner and the Native American Heritage Commission (NAHC) immediately, per Section 5097.98 of the California PRC and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the archaeologist and the NAHC-designated MLD shall recommend the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human remains are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in California PRC Section 5097.94.

The identification of human remains during construction activities would occur through implementation of mitigation measures Cul-2D and Cul-2E, and treatments under the California PRC and Health and Safety Code are specified under mitigation measure Cul-2E. Compliance with California Health and Safety Code Sections 7050.5 and 7052 and California PRC Section 5097 would provide an opportunity to avoid or minimize the disturbance of human remains, and to appropriately treat any remains that are discovered. Implementation of these measures would reduce the impacts of inadvertent discoveries of human remains to a less than significant level.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

No new or revised mitigation measures are required.

Level of Significance After Mitigation

Implementation of mitigation measures Cul-2D and Cul-2E would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

3.4.4 CUMULATIVE IMPACTS AND MITIGATION

Cultural Resources Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative cultural resources impact considering past, present, and probable future projects?

Cumulative Impact	Significance	2018 LRDP Contribution	Update to the LRDP Contribution
Regional loss of built environment resources.	Potentially significant.	Cumulatively considerable and unavoidable.	Cumulatively considerable and unavoidable, even with Cul-1A, Cul-1B, Cul-1C; Cul-1D; Cul-1E; Cul-1F; and Cul-1G.
Regional loss of archaeological resources and human remains.	Potentially significant.	Not cumulatively considerable.	Not cumulatively considerable with Cul-2A, Cul-2B, Cul-2C, Cul-2D, and Cul-2E.

Historical (Built Environment) Resources

The geographic context for the cumulative analysis of historic resources impacts is the San Diego region and much of southern California and could extend nationwide, particularly for the historic military structures. Specifically, cumulative impacts to historic resources would involve projects affecting local resources with the same level or type of designation or evaluation, projects affecting other structures located within the same historic district, or projects that involve resources that are significant within the same context as other resources associated with the proposed project. If expected, cumulative impacts would substantially diminish the number of historical resources within the same or similar context or property type.

Development and redevelopment of the San Diego region, including the UC San Diego campus, have resulted in the removal or alteration of structures, buildings, districts, and/or landscapes constructed during the early settlement days of the region. Future development across San Diego County associated with population growth would continue this trend as infill development is encouraged, which could remove or alter additional historic structures on a project-by-project basis. Local jurisdictions have processes for evaluating projects including environmental review and documentation pursuant to CEQA and policies to protect resources. In general, implementation of those policies and compliance with federal, state, and local regulations would preclude impacts to historic resources. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures. Therefore, a loss of historic resources at UC San Diego and in the San Diego region may continue to occur over time leading to a cumulatively significant impact.

Implementation of the proposed Update to the 2018 LRDP would result in the removal of building space through planned redevelopment, not all of which contain historic resources. If, as part of implementation of the Update to the 2018 LRDP, multiple historical resources are removed, it may contribute to the regional loss of historical resources and/or districts. In the project area, impacts may include (and are not limited to):

- Removal of most historical resources associated with a particular architect who was notable on a local, state, and/or national level and an important contributor to the development of the built environment on campus.
- Removal of most historical resources that convey a particular architectural style or mode.
- Removal of most historical resources that represent a significant historic context or theme.
- Removal of most contributors within a historic district such that the district is no longer able to convey its significance.

Generally, compliance with the mitigation measures (i.e., Cul-1A and Cul-1B) identified in this section would reduce project-level impacts to the collective resource base by requiring proper treatment and documentation of the affected resources, thereby reducing the Update to the LRDP's contribution to cumulative impacts. However, it is anticipated that several historical resources may be demolished, which include, but are not limited to the Medical Teaching Facility, the Main Gym and Natatorium, the Rec Gym (shows up as a district contributor), Sumner Auditorium, Camp Matthews Sentry Booth, and University Center Building 409. Cul-1C and Cul-1D would apply to projects that would result in the alteration of historic resource(s) that cannot be mitigated through Secretary of the Interior Standards compliance described in Cul-1A and Cul-1B, and the impacts would be considered significant and unavoidable. Supplemental mitigation measures Cul-1E through Cul-1G are required in addition to the standard mitigation programs for individual projects, as deemed appropriate, depending on the extent of the project impacts. However, implementation of supplemental mitigation measures Cul-1E through Cul-1G would not reduce significant impacts to below a level of significance. Therefore, the project's contribution to cumulative historic resource impacts would be cumulatively considerable, and impacts would be significant and unavoidable, similar to the conclusions of the 2018 LRDP EIR.

Archaeological Resources and Human Remains

The geographic context for the analysis of cumulative impacts for prehistoric cultural resources, including human remains, consists of the Kumeyaay ancestral territory that extends roughly from below Santo Tomas in Mexico north to the San Luis Rey River and east to the Colorado River. Archaeological resources associated with this region include a wide variety of hunting, gathering, and habitation sites, representing prehistory since time immemorial.

Prehistoric sites located within coastal San Diego County, including the UC San Diego campus, include sites dating back to Early Period Native American occupation. These coastal areas were a preferred location for prehistoric inhabitants as they are for current residents. Many of these coastal sites have been lost due to urban development and to natural erosion along the seashore resulting in a cumulative impact.

Implementation of the proposed Update to the 2018 LRDP has the potential to result in impacts to archaeological resources and human remains. The majority of future development would occur

within previously developed areas, with the exception of two areas of undeveloped land being redesignated from Open Space Preserve to General Services. The potential exists for previously unknown cultural resources to be encountered during ground-disturbing activities, and if encountered at multiple sites this could result in cumulative impacts. Similar to potential future development under the proposed Update, regional development could result in impacts to known or unknown cultural resources during ground disturbance. Proper planning and appropriate mitigation can help to capture and preserve knowledge of such resources and can provide opportunities for increasing our understanding of the past environmental conditions and cultures by recording data about sites discovered and preserving artifacts found. Federal, state, and local laws are also in place that protect these resources in most instances. Even so, it is not always feasible to protect these resources, particularly when preservation in place would make projects infeasible. For this reason, the cumulative effects of past, present and future projects in San Diego County, including the proposed project, could result in a potentially significant cumulative impact on archaeological resources. However, compliance with California Health and Safety Code Sections 7050.5 and 7052 and California PRC Section 5097, as well as PRC Section 21080.3.2 and Section 21084.3 (a), and implementation of mitigation measures Cul-2A through Cul-2E would provide an opportunity to avoid or minimize disturbance or to ensure appropriate treatment and disposition of archaeological resources, including human remains, should inadvertent disturbance occur. Thus, by applying mitigation and complying with applicable state codes, the project's contribution to cumulative impacts would not be cumulatively considerable, consistent with the conclusions of the 2018 LRDP EIR.

3.4.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under cultural resources are evaluated above. There are no CEQA issues where there is no potential for a significant effect.

3.4.6 REFERENCES

Jow, Stephanie, and Theodore G. Cooley 2018. *Archaeological Resources Report for the 2018 UC San Diego Long Range Development Plan, San Diego County, California*. November.

Architectural Resources Group (ARG). 2025. *Supplemental Historical Resources Technical Report.* February 20.

Castells, Shelby. 2021. *Archaeological Monitoring Results Report for the UCSD Ridge Walk Improvements Project, San Diego, California*. Confidential letter report prepared by Red Tail Environmental and submitted to UC San Diego Campus Planning.

Turner, James and Mary Robbins-Wade. 2025. *Supplement to the Archaeological Resources Report for the 2018 UC San Diego Long Range Development Plan.* Prepared for UC San Diego by HELIX Environmental Planning, Inc. (HELIX). March 17.

3.5 ENERGY

This section assesses the consumption of energy associated with implementation of the Update to the 2018 LRDP. In the 2018 LRDP EIR, energy was addressed in Section 3.15, Utilities, Service Systems and Energy. Additional information related to energy was also provided in Section 3.6, Greenhouse Gas Emissions, of the 2018 LRDP EIR. For this SEIR, energy is discussed separately as its own issue area consistent with the current guidance from Appendix G of the CEQA Guidelines. This section also provides a background discussion of existing and proposed energy sources and a summary of applicable regulations. Greenhouse gas (GHG) emissions are directly correlated to fossil fuel energy use (e.g., oil, natural gas, coal) related to campus operations; therefore, information provided in this section is based, in part, on the information provided in the Subsequent Greenhouse Gas Emissions Analysis prepared for the proposed Update to the 2018 LRDP (HELIX 2025), included as Appendix F to the SEIR.

3.5.1 ENVIRONMENTAL SETTING

3.5.1.1 ENERGY AND RELATED UTILITIES

It remains the case, as described in Section 3.15.1.4 of the 2018 LRDP EIR, that the campus' energy use includes electricity generated on campus at the Central Utilities Plant, electricity purchased from the UC Energy Services Unit Direct Access Program (100 percent renewable), a small amount of electricity purchased from SDG&E by privately-operated facilities on a UC San Diego ground lease, and natural gas purchased from SDG&E. UC San Diego has built one of the world's the most advanced microgrids that provides a flexible, resilient, reliable, secure energy distribution system that is capable of generating approximately 85 percent of the electricity used on campus annually. The campus contains a 2.4-megawatt (MW) solar network consisting of an array of rooftop, carport and ground mounted systems, including several integrated with advanced energy systems. UC San Diego also continues to invest in energy storage research and implementation projects, including a 9 MW battery storage system on the East Campus (UC San Diego 2024a).

The 2018 LRDP EIR estimated implementation of the 2018 LRDP would result in the use of 188,820 megawatt hours (MWh) of electricity and 2,232,873 therms of natural gas in 2035. Campus energy use in 2023 was comprised, in part, of 101,662 MWh of electricity and 29,222,580 therms of natural gas, a decrease in electricity use and increase in natural gas use compared to the annual energy use disclosed in the 2018 LRDP EIR for 2035. The increase in existing natural gas usage over the 2018 LRDP EIR's projection for 2035 is a direct result of the cogeneration plant not yet being decarbonized.

According to the GHG inventory prepared for 2022 (UC San Diego 2024b), the campus vehicle fleet consumed approximately 406,816 gasoline gallon equivalents of compressed natural gas (CNG), 10,319 gallons of biofuels, 32 gallons of diesel fuel, 171,012 gallons of gasoline, and 10,000 gallons of propane.

3.5.2 REGULATORY FRAMEWORK

Energy use and generation regulations that pertain to the proposed Update to the 2018 LRDP and have been updated from those described in the 2018 LRDP EIR or were not included in the 2018 LRDP EIR are described below. Many regulations aimed at the reduction of GHG emissions correlate

with reductions in energy use. While those regulations described in Section 3.6, Greenhouse Gas Emissions, of the SEIR may affect energy consumption on campus, the following descriptions of the applicable regulatory framework focus on those regulations that directly relate to energy generation or consumption for UC San Diego.

3.5.2.1 FEDERAL

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law. In addition to setting increased Corporate Average Fuel Economy (CAFE) standards for motor vehicles, the act includes the following provisions related to energy efficiency:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and lighting efficiency standards (Sections 301–325)
- Building energy efficiency (Sections 411–441)

This federal legislation requires ever-increasing levels of renewable fuels to replace petroleum (Section 202, RFS). The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the act, the original RFS program required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the Energy Independence and Security Act of 2007, the RFS program was expanded in several key ways that laid the foundation for achieving significant reductions of GHG emissions through the use of renewable fuels, for reducing imported petroleum, and for encouraging the development and expansion of the nation's renewable fuels sector.

USEPA and NHTSA Vehicle Standards

On April 1, 2010, the USEPA and the National Highway Traffic Safety Administration (NHTSA) announced a joint final rule to establish a national program consisting of new standards for light-duty vehicles model years 2012 through 2016. In December 2021, USEPA issued a new rule formally adopting standards previously proposed in August 2021 for model years 2023 and 2024 and finalizing more stringent standards than previously proposed for model years 2025 and 2026. The rule assumes a 17 percent electric vehicle market penetration by 2026. While this differs from the NHTSA CAFE standards, the USEPA coordinated with NHTSA during development of the new standards. On March 20, 2024, USEPA announced new, more ambitious final standards aimed at further reducing harmful air pollutant emissions from light-duty and medium-duty vehicles, starting with model year 2027. These standards build on the USEPA's final GHG emissions standards for passenger cars and light trucks for model years 2023 through 2026 and leverage advances in clean car technology. The standards decrease energy use in the form of fuel, as they are designed to reduce climate pollution, improve public health, and save drivers money through decreased fuel and maintenance costs. The standards will be phased in over model years 2027 through 2032.

3.5.2.2 STATE

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The Act established state policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. The California Public Utilities Commission regulates privately owned utilities in the energy, rail, telecommunications, and water fields.

Integrated Energy Policy Report

SB 1389 (Chapter 568, Statutes of 2002; PRC 25300–25323) requires the CEC to "conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices." To address this requirement, the CEC prepares a biennial Integrated Energy Policy Report (IEPR) addressing major energy trends and issues, as well as policy recommendations to address these issues. Updates to the IEPR are also adopted on years that a new IEPR is not prepared. The 2023 IEPR is the most recent IEPR, adopted on February 14, 2024, and forecasts statewide electricity sales grow to almost 352,600 GWh in 2040. However, this is lower than prior projections due to slower growth, increases in rooftop solar generation, and increases in electricity rates. The 2023 IEPR also identifies the need to accelerate the connection of clean energy resources to the electricity grid and explores the potential for hydrogen to be used as a more prominent energy source (CEC 2024).

Renewables Portfolio Standard Program

California's Renewables Portfolio Standard (RPS) program was established in 2002 by SB 1078 with the initial requirement that 20 percent of electricity retail sales must be served by renewable resources by 2017. The program was accelerated in 2015 by the SB 350 mandate to achieve a 50 percent RPS by 2030, with interim annual targets. In 2018, SB 100 again increased the RPS to 60 percent by 2030 and required all the state's electricity to come from carbon-free resources by 2045. SB 1020 (September 2022) furthered the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers come from eligible renewable energy resources and zero-carbon resources: 90 percent by December 31, 2035; 95 percent by December 31, 2040; and 100 percent by December 31, 2045.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 required CEC to prepare a state plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other state, federal, and local agencies. The State Alternative Fuels Plan presents strategies and actions the State of California must take to increase the use of alternative nonpetroleum fuels in a manner that minimizes the costs to the state and maximizes the economic benefits of in-state production. The State Alternative Fuels Plan assessed various alternative fuels and developed fuel portfolios to meet state goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Executive Order S-06-06

Executive Order (EO) S-06-06 was signed by Governor Schwarzenegger on April 25, 2006, and established targets for the use and production of biofuels and biopower. The order directs state agencies to work together to advance biomass programs in the State of California while providing environmental protection and mitigation. The EO establishes the following target to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels within California by 2010, 40 percent by 2020, and 75 percent by 2050. The EO also calls for the state to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so that the state can meet its clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 plan and provides a more detailed action plan to increase the use of bioenergy technologies in a manner that creates jobs and protects the environment.

California Building Standards Code

The California Building Standards Code or Title 24 of the California Code of Regulations (CCR) contains the regulations that govern the construction of buildings in California. Within the Building Standards Code, two parts (Parts 6 and 11) pertain to the incorporation of energy efficient and green building elements into land use development: Part 6 contains California's Energy Efficiency Standards for Residential and Non-Residential Buildings and Part 11 contains the California Green Building Standards Code, also known as CALGreen. Since the 2016 Title 24 regulations described in the 2018 LRDP EIR were adopted, two revisions to the Title 24 standards have been adopted. The current 2022 California Building Standards Code became effective January 1, 2023.

Building standards located in Title 24, Part 6 of the CCR and commonly referred to as "Title 24," are energy efficiency standards originally established in 1978 in response to a legislative mandate to reduce California's energy consumption. Four key areas were updated in the 2022 version of the Building Energy Efficiency Standards: standards for electric heat pumps, construction of electrification-ready buildings, expansion of solar energy and battery storage standards, and improved indoor ventilation standards (CEC 2021).

CALGreen provides additional regulations for energy efficiency, in addition to water efficiency and conservation, material conservation and resource efficiency, environmental quality, and more. Changes to both the 2019 and 2022 versions of CALGreen primarily included increases in the requirements for residential and nonresidential buildings with electric vehicle charging infrastructure.

Leadership in Energy and Environmental Design

The U.S. Green Building Council administers the LEED certification program and has continued to update its criteria for certification, including an updated "v5" rating system anticipated to become effective at the beginning of 2025. LEED is based on prerequisites and credits that a project meets to achieve a certification level of Certified, Silver, Gold, or Platinum. There are currently 58 LEED certified buildings on the UC San Diego campus, an increase from the 34 LEED certified buildings noted in the 2018 LRDP EIR (UC San Diego 2024c).

California Environmental Quality Act Guidelines

In 2019, the CEQA Guidelines were updated to include an Energy section within Appendix G. Energy use had previously been a required topic for discussion in EIRs and was discussed in CEQA documents in relation to GHG emissions. Appendix F of the CEQA Guidelines, which contains energy conservation analysis requirements and potential mitigation measures related to energy impacts, was not updated with the addition of Energy to Appendix G and continues to guide the analysis of energy impacts under CEQA.

3.5.2.3 UNIVERSITY OF CALIFORNIA

UC Sustainable Practices Policy

The UC Sustainable Practices Policy has been updated since certification of the 2018 LRDP EIR with the most recent version becoming effective in April 2024 (UC 2024). Portions of the UC Sustainable Practices Policy most directly related to energy include green building design, clean energy, and sustainable building and laboratory operations. Additionally, energy reductions are expected to be achieved as a co-benefit of other policy areas. No substantial changes to the sustainable building and laboratory operations policies have occurred since the 2018 LRDP EIR; the updates to the green building design and clean energy policies are described below.

The green building design policies have been updated to require new buildings to achieve LEED Gold and strive for LEED Platinum. New parking structures must also now meet Parksmart Silver standards and strive to achieve Parksmart Gold certification. New buildings or renovations cannot incorporate the use of natural gas unless alternative energy sources are not feasible. The requirements to exceed Title 24 standards by at least 20 percent or meet whole-building energy performance compliance targets remain the same. As described above, Title 24 standards continue to be updated over time and new buildings would continue to exceed these efficiency standards in accordance with the UC Sustainable Practices Policy. For acute care, hospital facilities, and medical office buildings, the requirement is to outperform American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards (Standard 90.1) by at least 30 percent or meet the whole-building energy performance targets.

The policies related to clean energy remain similar to those described in the 2018 EIR, except for the transition to biomethane in place of natural gas. The current UC Sustainable Practices Policy requires 20 percent of the natural gas historically combusted on-site to be biomethane by 2025, anticipates a doubling of biomethane volume by 2030, and halts use of biomethane by 2040.

3.5.2.4 UC SAN DIEGO

Climate Action Plan

A 2019 update to the UC San Diego 2008 CAP provided a climate change mitigation strategy for meeting the Presidential Carbon Neutrality Initiative. The 2019 UC San Diego CAP directs building energy efficiency to improve through lighting or minor control equipment upgrades for existing buildings and lighting, mechanical system, and building envelope upgrades for major renovations. The 2019 CAP also noted purchased grid power would be 100 percent carbon neutral by 2021, and the campus would continue to investigate new renewable energy options for generation on campus. As directed by the 2024 UC Sustainable Practices Policy, UC San Diego is in the process of updating its CAP to establish and achieve GHG emissions reductions consistent with the current UC

Sustainable Practices Policy targets, while also incorporating climate adaptation and resiliency considerations. Refer to Section 3.6.2 for further discussion of the UC San Diego CAP.

3.5.3 PROJECT IMPACTS AND MITIGATION

3.5.3.1 ISSUE 1 —WASTEFUL, INEFFICIENT, OR UNNECESSARY USE OF ENERGY

Energy Issue 1 Summary

Would implementation of the Update to the 2018 LRDP result in the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	Yes.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Decarbonization of the Central Utilities Plant (GHG-1A).

Summary of Analysis in the 2018 LRDP EIR

Section 3.15.3.6 of the 2018 LRDP EIR analyzed whether implementation of the 2018 LRDP would result in the wasteful, inefficient, or unnecessary use of energy. As a result of compliance with applicable construction equipment idling regulations, state and UC San Diego programs increasing building energy efficiency, below-average vehicle miles traveled, and use of renewable energy resources, the 2018 LRDP EIR concluded impacts would be less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The increase in building space and campus population proposed under the Update to the 2018 LRDP could increase the consumption of energy resources during both construction and operation.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

The UC Sustainable Practices Policy has been revised since preparation of the energy analysis in the 2018 LRDP EIR. New policies are considered in this analysis.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in the wasteful, inefficient, or unnecessary use of energy. Development under the Update to the 2018 LRDP would result in wasteful, inefficient, or unnecessary use of energy if it would not implement construction or operational practices that strive to reduce energy use beyond typical demand.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

As described above, the analysis of potential energy use for the proposed Update to the 2018 LRDP is primarily based on qualitative analysis of whether energy efficiency practices are incorporated into proposed development. Where quantification of potential energy demand is provided, it is based on the proposed land use and building space projections for the Update to the 2018 LRDP without consideration of project-specific features that influence energy demand given these details are not available for analysis of an overall land use plan.

Impact Analysis

New development under the Update to the 2018 LRDP would consume energy for several purposes including but not limited to construction activities, building heating and cooling, refrigeration, lighting, electricity, commercial equipment, and vehicle trips. These sources of energy demand are consistent with those anticipated for the 2018 LRDP but would increase due to the proposed expanded building space and campus growth.

Construction Energy Usage

Consistent with the analysis in the 2018 LRDP EIR, projects constructed on campus under the Update to the 2018 LRDP would result in an increase in energy consumption. As additional construction projects would be undertaken with the Update to the 2018 LRDP, an increase in total energy required for construction would occur. This would result from the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, as well as the use of electricity for temporary buildings, lighting, and other sources. Construction equipment and practices required to implement the Update to the 2018 LRDP would be typical of urban development. As construction would primarily occur on previously developed sites, energy intensive activities such as mass grading and blasting would be minimized. In addition, limitations on idling vehicles and equipment, along with requirements for proper maintenance, would continue to generate fuel savings for construction on campus. Idling restrictions for both on-road and off-road diesel-powered equipment are governed by CCR Title 13, Sections 2449(d)(2) and 2485. The use of construction equipment over 50 horsepower achieving Tier 4 standards in accordance with

mitigation measure AQ-2B could also reduce fuel consumption where these engines are more efficient; however, not all Tier 4 equipment is more fuel efficient than standard equipment, so this mitigation measure is not considered to reduce fuel consumption for the purposes of this analysis. Nonetheless, given the high cost of fuel, contractors and UC San Diego have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. Therefore, while energy used for construction would increase from the Update to the 2018 LRDP, the Update to the 2018 LRDP would not result in wasteful, inefficient, and unnecessary consumption of energy.

Operational Mobile Sources

Energy consumption directly attributable to mobile sources from the proposed Update to the 2018 LRDP would be related to the fuel consumption associated with on-road motor vehicles. As described further in Section 3.2.3.2 related to mobile source emission assumptions, a revised methodology for quantifying vehicle trips is considered in this SEIR and incorporates reductions from the use of alternative transportation methods and remote work protocols. The ADT for buildout of the Update to the 2018 LRDP were estimated to be approximately 73,915 trips in 2040 (LLG 2025), representing a reduction of 43,294 ADT compared to the trips anticipated with buildout of the 2018 LRDP.

The TDM program implemented by UC San Diego contributes to reduced single-occupancy vehicle (SOV) trips from off-campus populations by providing and incentivizing use of alternative transportation options among other programs described in Section 3.10, Transportation and Circulation, of the SEIR. The campus is also within a TPA with many accessible modes of public transit available to commuters. Notably, since certification of the 2018 LRDP EIR, two on-campus trolley stations have opened, and the UC San Diego Blue Line provides transit service from campus towards downtown San Diego. UC San Diego has also increased its use of alternative fuel or hybrid vehicles to 65 percent of its vehicle fleet (UC San Diego 2024d). The decrease in vehicle trips described above is a result of implementing these TDM programs, as the calculated trips for buildout of the Update to the 2018 LRDP account for increases in carpooling, transit use, biking and pedestrian trips, remote work/learning, and on campus student residents. As a result of decreased vehicular trips, the energy sources required for SOV trips would also decrease. While not required to reduce a potentially significant impact to energy, mitigation measure GHG-1B would require additional electric vehicle charging stations to be installed on campus. In addition to the overall decrease in transportation-related energy use anticipated under the Update to the 2018 LRDP, the energy used for transportation would also be more efficient with its use for transit services.

The Update to the 2018 LRDP would decrease vehicle trips and associated energy demand from what was analyzed in the 2018 LRDP EIR. The inclusion of additional on-campus housing and continued implementation of TDM programs as part of the Update to the 2018 LRDP would reduce SOV energy consumption and increase the efficiency of transportation-related energy use compared to typical development and the scenarios where additional students are housed off-campus. Therefore, the Update to the 2018 LRDP would not result in the wasteful, inefficient, or unnecessary use of energy associated with mobile sources.

Electricity and Natural Gas

This analysis estimates the energy consumption associated with implementing the Update to the 2018 LRDP based on the types and intensity of proposed land uses. It should be noted that energy consumption estimates identified in this section are based on standard factors and do not reflect

the individual characteristics of future projects that could not be known when the 2018 LRDP EIR or this SEIR was prepared.

Energy consumption for both the 2018 LRDP and Update to the 2018 LRDP were estimated based on the applicable building space buildout projections and proposed land uses without consideration of energy conservation actions, including the UC Sustainable Practices Policy requirements. The 2018 LRDP EIR estimated implementation of the 2018 LRDP would result in the use of 188,820 MWh of electricity and 2,232,873 therms of natural gas in 2035. Based on data available in the *Decarbonization Study Prepared for University of California, San Diego* (Salas O'Brien 2024), the Update to the 2018 LRDP is anticipated to require 1,135,615 MWh per year of electricity at buildout in 2040, resulting in an increase in projected electricity demand compared to the 2018 LRDP as a result of additional building space, decarbonization of the Central Utilities Plant, and electrification of existing boilers campuswide. As discussed in Section 3.6.3.1, the former 2018 LRDP GHG Reduction Action that set a goal to switch the campus cogeneration system in the Central Utilities Plant to 40 percent biogas by 2030 was removed as it was superseded by the Decarbonization Study goals. Mitigation measure GHG-1A would now be required to reduce a potentially significant GHG emissions impact and would ensure decarbonization of the Central Utilities Plant. Natural gas use would not increase under the Update to the 2018 LRDP given that new facilities would be electric-only in accordance with the UC Sustainable Practices Policy. UC San Diego is anticipated to require 867,590 therms of natural gas in 2040, a decrease from both existing natural gas usage and the 2018 LRDP EIR projections for 2035, after electrification of boilers that currently use natural gas. While total energy demand would increase with the Update to the 2018 LRDP SEIR, the continued implementation of UC Sustainable Practices Policy requirements would make electricity use more efficient.

The UC Sustainability Practices Policy requires 20 percent or better energy performance compared to Title 24 requirements, 30 percent or better energy performance for medical buildings compared to ASHRAE Standard 90.1, or whole-building energy performance compliance with targets from the UC Sustainable Practices Policy for new construction. Therefore, new buildings constructed under the Update to the 2018 LRDP would incorporate energy efficiency above standard statewide requirements. This requirement is typically achieved via the installation of newer technologies, such as high-efficiency appliances or lighting, waste heat recovery units, or radiant flooring. New buildings and major renovations would also be required to achieve a LEED rating of at least Gold and strive for Platinum, which require additional sustainable building features including those for energy efficiency. The electricity used in these new buildings is also 100 percent clean energy, as described further in Section 3.5.3.2 below.

As discussed in the 2018 LRDP EIR, water conveyance and treatment also requires energy and was anticipated to consume approximately 19 MWh of electricity in 2035. Based on projected water and wastewater flows (Latitude 33 2024), domestic water demand and wastewater generation are anticipated to consume approximately 20,897 MWh of electricity per year in 2040[1](HELIX 2025). The increase in energy consumption from increased water use would be a small portion of campus energy demand and would not be wasteful, inefficient, or unnecessary. It would not be inefficient because UC San Diego has extensive water conservation programs in place and would continue to look for opportunities to reduce water consumption. The Update to the 2018 LRDP would not result in the wasteful, inefficient, or unnecessary use of energy associated with electricity or natural gas.

[1] Note that the current water use includes a correction from the 2018 LRDP EIR.

Level of Significance Before Mitigation

As described above, impacts related to construction energy, operational mobile source energy, and electricity would be less than significant, consistent with the conclusion in the 2018 LRDP EIR. With regards to natural gas use, impacts would be potentially significant, due in part to the former GHG Reduction Action that required a switch to biogas for the Central Utilities Plant being removed as part of the Update to the 2018 LRDP because it was superseded by the goal in the 2024 Decarbonization Study to replace the natural gas boilers at the Central Utilities Plant with electrode boilers. Therefore, the Update to the 2018 LRDP would require the implementation of mitigation to ensure impacts are reduced to a less than significant level.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

No mitigation measures were included.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

Mitigation measure GHG-1A would be required, as listed in Section 3.6.3.1.

Level of Significance After Mitigation

With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.

3.5.3.2 ISSUE 2 — CONFLICT WITH RENEWABLE ENERGY OR ENERGY EFFICIENCY PLAN

Energy Issue 2 Summary

Would implementation of the Update to the 2018 LRDP conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Decarbonization of the Central Utilities Plant (GHG-1A).

Summary of Analysis in the 2018 LRDP EIR

This topic was not included in the 2018 LRDP EIR as an individual EIR section because at the time the CEQA Guidelines did not include Energy as a separate Appendix G checklist section. However, the analysis of energy impacts was included within the Utilities, Service Systems and Energy section of the 2018 LRDP EIR in compliance with Appendix F from the CEQA Guidelines. Section 3.15.3.6 of the 2018 LRDP EIR, summarized above, discussed that the 2018 LRDP would not result in the inefficient use of energy by demonstrating that development under the 2018 LRDP would exceed the requirements of energy efficiency regulations and plans. In addition, the analysis in the 2018 LRDP EIR discussed the consistency of the 2018 LRDP with the renewable energy requirements of the UC Sustainable Practices Policy. As such, it can be concluded that the 2018 LRDP would not result in conflicts with renewable energy or energy efficiency plans and impacts would be less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The new development proposed under the Update to the 2018 LRDP could result in changes to renewable energy generation and energy efficiency.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

The UC Sustainable Practices Policy has been revised since preparation of the energy analysis in the 2018 LRDP EIR. New policies are considered in this analysis. Changes in statewide building energy efficiency regulations occur regularly and were anticipated in the 2018 LRDP EIR.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The UC Sustainable Practices Policy requires energy efficiency beyond what is required by state regulations and requires electricity used by campuses to be derived from renewable resources by 2025, which is sooner than the statewide requirement for utility providers to derive retail electricity from renewable resources after 2045. Therefore, the following analysis discusses the consistency of the proposed Update to the LRDP EIR with respect to the energy-related portions of the UC Sustainable Practices Policy, which would demonstrate compliance with less stringent state regulations.

Impact Analysis

The standards established by the UC Sustainable Practices Policy require the purchase of renewable electricity sources by 2025, which is before the date required for statewide utility generators to provide electricity sourced from renewable resources to all customers. UC San Diego already purchases 100 percent renewable electricity from the UC Energy Services Unit Direct Access Program and would continue to do so. By 2025, electricity purchased from SDG&E would also be required to be clean electricity or would be replaced by electricity generated via on-campus or other renewable resources. Therefore, any development project carried forward to implement the Update to the 2018 LRDP would utilize 100 percent clean electricity either from the UC Energy Services Unit Direct Access Program or purchased through SDG&E.

The UC Sustainable Practices Policy also requires the transition away from natural gas use via the transitional use of biomethane and eventual elimination of both natural gas and biomethane use by 2040. As discussed above, the former 2018 LRDP GHG Reduction Action that set a goal to switch the campus Central Utilities Plant to 40 percent biogas by 2030 was removed from the Update to the 2018 LRDP as it was superseded by the Decarbonization Study goals. Mitigation measure GHG-1A would now be required to reduce a potentially significant GHG emissions impact and would ensure decarbonization of the Central Utilities Plant via electrification of boilers that currently use natural gas. Therefore, the Update to the 2018 LRDP would comply with the clean energy provisions of the UC Sustainable Practices Policy.

As described in Section 3.15.3.6 of the 2018 LRDP EIR, UC San Diego exceeded its share of the 2017 UC Sustainable Practices Policy goal to generate 10 MW of renewable energy, UC system-wide, by providing 3.1 MW of energy from solar panels (above an average per-campus share of 1 MW). The current 2024 UC Sustainable Practices Policy does not commit campuses to a specific amount of renewable energy generation on campus; however, the generation of energy from renewable resources contributes to the commitment of the Clean Energy section of the UC Sustainable Practices Policy to install on-site renewable energy sources when cost-effective or supportive of other goals. As described in Section 3.5.1, above, at the La Jolla campus UC San Diego currently operates a 2.4 MW network of solar panels and provides storage capacity. Most new buildings at UC San Diego have been constructed with solar panels to add to the capacity of the existing solar network. Additional electricity generated on campus as a result of new development installing solar panels or other energy sources would decrease the need to purchase electricity, though purchased electricity is also required to be 100 percent clean energy by 2025 and would, therefore, not conflict with clean energy goals. Compliance with the renewable energy requirements of the UC Sustainable Practices Policy would continue under the Update to the 2018 LRDP and there would be no conflict with state plans for renewable energy.

Development under the Update to the 2018 LRDP would result in increased energy consumption but would be developed with greater energy efficiency than required by state plans. As development would occur in compliance with the UC Sustainable Practices Policy, which requires energy efficiency improvements (such as 20 percent beyond Title 24) as well as LEED Gold certification, buildings would incorporate energy efficiency features beyond statewide requirements. Therefore, the Update to the 2018 LRDP would not result in conflicts with energy efficiency plans.

Level of Significance Before Mitigation

As discussed above, impacts related to consistency with the Clean Energy component of the UC Sustainable Practices Policy would be potentially significant given the former GHG Reduction Action related to biogas for the Central Utilities Plant was superseded by the goal in the 2024 Decarbonization Study to replace the natural gas boilers at the Central Utilities Plant with electrode boilers. Therefore, the Update to the 2018 LRDP would require the implementation of mitigation to ensure impacts are reduced to a less than significant level.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

No mitigation measures were included.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

Mitigation measure GHG-1A would be required, as listed in Section 3.6.3.1.

Level of Significance After Mitigation

With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.

3.5.4 CUMULATIVE IMPACTS AND MITIGATION

Energy Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative energy impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Wasteful, Inefficient, or Unnecessary Use of Energy.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable with GHG-1A.
Conflict with Renewable Energy or Energy Efficiency Plan.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable with GHG-1A.

The study area for cumulative impacts on energy is the San Diego region. The cumulative context for electricity and natural gas facilities is the services area for each utility. The cumulative effect of

regional growth, in conjunction with campus growth under the Update to the 2018 LRDP, on energy is discussed below.

Wasteful, Inefficient, or Unnecessary Use of Energy

The 2018 LRDP EIR concluded cumulative impacts related to the use of energy resources would be less than significant. Development and redevelopment associated with cumulative projects would increase demand for energy resources during both construction and operations; however, the extensive regulatory framework established by the State of California, including Title 24 requirements, provides that such development would not result in the wasteful, inefficient, or unnecessary use of energy resources. As a result of compliance with statewide regulations, cumulative development is not anticipated to result in the wasteful, inefficient, or unnecessary use of energy resources. As described above, the Update to the 2018 LRDP would be more stringent than standard statewide energy efficiency requirements because of compliance with the UC Sustainable Practices Policy after implementation of mitigation measure GHG-1A. Therefore, the cumulative impact would be less than significant and the Update to the 2018 LRDP would not result in a cumulatively considerable contribution to a cumulative energy use impact, consistent with the conclusion of the 2018 LRDP EIR.

Conflict with Renewable Energy or Energy Efficiency Plan

As described above for Issue 2, this threshold was not specifically addressed in the 2018 LRDP EIR; however, the cumulative impact discussion of energy resources discussed energy efficiency plan compliance and concluded cumulative impacts related to energy efficiency would be less than significant. Consistent with the discussion provided in the 2018 LRDP EIR, the Update to the 2018 LRDP along with identified cumulative development projects would be required to implement renewable energy and energy efficiency plan requirements. These include Title 24 requirements for energy efficiency features and on-site renewable energy generation in residential and nonresidential buildings. In addition, many policies of statewide energy plans are not implemented at the project level for surrounding development but rather include requirements for electricity providers to increase the percentage of their electricity sales that are generated from renewable resources. The Update to the 2018 LRDP and development in the surrounding area would not inhibit the ability of utility companies to increase renewable electricity generation. Cumulative development would not conflict with renewable energy or energy efficiency plans. With implementation of mitigation measure GHG-1A, campus development under the Update to the 2018 LRDP would also implement the UC Sustainable Practices Policy, which has more stringent requirements for energy efficiency and sooner requirements for 100 percent renewable energy use than the state. Therefore, the cumulative impact would be less than significant and the Update to the 2018 LRDP would not result in a cumulatively considerable contribution, consistent with the conclusion of the 2018 LRDP EIR.

3.5.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under Energy are evaluated above. There are no CEQA issues where there is no potential for a significant effect related to Energy.

3.5.6 REFERENCES

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2024b. University of California, San Diego The Climate Registry - Detailed Report. January 4.

2024c. UC San Diego LEED Projects. Accessed July 8. Available at https://plandesignbuild.ucsd.edu/design/leed/index.html.

2024d. Transportation and Fleet Services. Accessed July 8. Available at https://facilityservices.ucsd.edu/sustainability/transportation.html.

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3.6 GREENHOUSE GAS EMISSIONS

This section assesses the GHG emissions that would be generated by implementation of the Update to the 2018 LRDP. The evaluation of impacts in this section considers whether new or substantially more severe GHG emissions impacts would result from the Update to the 2018 LRDP compared to those identified in Section 3.6 of the EIR certified for the 2018 LRDP. This section is based on the Subsequent Greenhouse Gas Emissions Analysis prepared for the Update to the 2018 LRDP (HELIX 2025) and included as Appendix F to this SEIR.

3.6.1 ENVIRONMENTAL SETTING

The discussion in Section 3.6.1 of the 2018 LRDP EIR related to the scientific basis of climate change and general sources of GHG emissions remain applicable to the conditions of climate change and this analysis. Additional information related to the methodology for GHG emissions quantification is provided below.

As described briefly in the 2018 LRDP EIR, because GHG emissions vary widely in the power of their climatic effects, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to carbon dioxide (CO_2). Historically, GHG emission inventories have been calculated using the GWPs from the Intergovernmental Panel on Climate Change's (IPCC's) Second Assessment Report. In 2007, IPCC updated the GWP values based on the latest science at the time in its Fourth Assessment Report (AR4) (IPCC 2007). In 2013, IPCC again updated the GWP values based on the latest science in its Fifth Assessment Report (AR5) (IPCC 2013). However, the United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines for national inventories require the use of GWP values from the AR4. To comply with international reporting standards under the UNFCCC, official emission estimates for California and the United States are reported using AR4 GWP values. Therefore, statewide and national GHG emission inventories have not yet updated their GWP values to the AR5 values. For consistency with the UNFCCC guidelines and existing state and national inventories, the analysis contained herein relies upon the AR4 GWP values. By applying the GWP ratios, carbon dioxide equivalent (CO_2e) emissions can be tabulated in metric tons (MT) per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 3.6-1, *Global Warming Potentials and Atmospheric Lifetimes.*

Table 3.6-1
Global Warming Potentials and Atmospheric Lifetimes

Greenhouse Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50-200	1
Methane (CH_4)	12	25
Nitrous Oxide (N_2O)	114	298
HFC-134a	14	1,430
PFC: Tetrafluoromethane (CF_4)	50,000	7,390
PFC: Hexafluoroethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800

Source: IPCC 2007.
HFC = hydrofluorocarbon; PFC = perfluorocarbon

3.6.1.1 GREENHOUSE GAS EMISSIONS INVENTORIES

Inventories of GHG emissions for the State of California, County of San Diego, and City of San Diego are provided in Section 3.6.1 of the 2018 LRDP EIR and updated versions are provided in the Subsequent Greenhouse Gas Emissions Analysis (Appendix F) for informational purposes. The GHG emissions inventory for UC San Diego has also been updated from the inventory provided in the 2018 LRDP EIR and is provided below.

University of California San Diego Greenhouse Gas Inventory

UC San Diego reports the annual GHG emissions inventory to an independent reporting organization, The Climate Registry (TCR). Table 3.6-2, *UC San Diego La Jolla Campus Greenhouse Gas Emissions*, provides campus GHG emissions for 2019 and 2022. The 2022 emissions are the most recent available for comparison with the conditions disclosed in the 2018 LRDP EIR while the 2019 emissions serve as a baseline for GHG emissions reduction goals and the threshold considered in this analysis.

The UC San Diego TCR inventory reported a total of 246,271 MT CO_2e for the UC San Diego La Jolla campus for the 2022 reporting year, representing a less than one percent increase from the 2015 emissions (244,564 MT CO_2e) inventory in the 2018 LRDP EIR. The TCR report included 176,137 MT CO_2e from Scope 1 emissions, 17,820 MT CO_2e from Scope 2 emissions, and 52,314 MT CO_2e from Scope 3 emissions (UC San Diego 2024a). The TCR inventory reported a total of 266,174 MT CO_2e for the campus for 2019, including 176,307 MT CO_2e from Scope 1 emissions, 9,292 MT CO_2e from Scope 2 emissions, and 80,575 MT CO_2e from Scope 3 emissions (UC San Diego 2020).

Scope 1 emissions include direct emissions from stationary combustion such as the cogeneration plant, boilers, and refrigerant use, as well as non-stationary combustion of fuels from the UC San Diego fleet vehicles. Scope 2 emissions are indirect stationary sources, such as emissions from purchased electricity and purchased steam for leased facilities. Scope 3 emissions result from activities associated with the campus but generated by sources not owned or controlled by UC San Diego. Examples of Scope 3 emissions include commuting by students, faculty, and staff and UC San Diego-paid business air travel.

Table 3.6-2
UC San Diego La Jolla Campus Greenhouse Gas Emissions

Scope	Sector	2019 Emissions[1] (MT CO_2e)	2022 Emissions[1] (MT CO_2e)
Scope 1	Stationary Combustion	168,951 (63%)	170,495 (69%)
	Mobile Combustion	4,657 (2%)	4,538 (2%)
	Fugitive/Other Emissions	2,699 (1%)	1,103 (<1%)
Scope 2	Purchased Electricity and Biomass Combustion	9,292 (3%)	17,820 (7%)
Scope 3	Air Travel and Commuting	80,575 (30%)	52,314 (21%)
	Total	**266,174**	**246,271**

Source: UC San Diego 2024a; UC San Diego 2020.
1 Totals and percentages may not sum due to rounding.
MT = metric tons; CO_2e = carbon dioxide equivalent

3.6.2 REGULATORY FRAMEWORK

The regulatory framework addressing GHG emissions and climate change provided in Section 3.6.2 of the 2018 LRDP EIR remains applicable to the Update to the 2018 LRDP. In addition, the following provides new or updated regulations and guidance that have changed from those described in the 2018 LRDP EIR. Given the close relationship between energy use and GHG emissions, many of the regulations described in Section 3.5.2 of this SEIR also relate to GHG emissions.

3.6.2.1 FEDERAL

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

In December 2021, the USEPA issued a new rule formally adopting standards previously proposed in August 2021 for model years 2023 and 2024 and finalizing more stringent standards than previously proposed for model years 2025 and 2026. The rule assumes a 17 percent electric vehicle market penetration by 2026. Although this is a departure from the National Highway Traffic Safety Administration (NHSTA) Corporate Average Fuel Economy standards, USEPA did coordinate with NHTSA during development of the new standards. On March 20, 2024, USEPA announced new, more ambitious final standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027. The final standards build upon USEPA's final standards for federal GHG emissions standards for passenger cars and light trucks for model years 2023 through 2026 and leverages advances in clean car technology to result in benefits to Americans ranging from reducing climate pollution, to improving public health, to saving drivers money through reduced fuel and maintenance costs. The standards will phase in over model years 2027 through 2032.

3.6.2.2 STATE

Assembly Bill 1279

Approved by Governor Newsom on September 16, 2022, AB 1279, *The California Climate Crisis Act*, declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 anticipates achieving these policies through direct GHG emissions reductions, removal of CO_2 from the atmosphere (carbon capture), and almost complete transition away from fossil fuels.

Senate Bill 905

Approved by Governor Newsom on September 16, 2022, SB 905, *Carbon Sequestration: Carbon Capture, Removal, Utilization, and Storage Program*, requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage Program to evaluate the efficacy, safety, and viability of carbon capture, utilization, or storage technologies and CO_2 removal technologies and facilitate the capture and sequestration of CO_2 from those technologies, where appropriate. SB 905 is an integral part of achieving the state policies mandated in AB 1279.

California Air Resources Board Scoping Plan

The Scoping Plan is a strategy CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across our society and economy to reduce emissions and reach our climate targets. On December 15, 2022, CARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in short-lived climate pollutants; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022).

3.6.2.3 UNIVERSITY OF CALIFORNIA

UC Sustainable Practices Policy

In 2003, the UC adopted a comprehensive policy of detailed guidelines for Green Building Design and Clean Energy Standards (UC Sustainable Practices Policy). This policy has been revised several times, the most recent version becoming effective in April 2024, which commits UC to implementing actions intended to minimize the UC's impact on the environment and reduce the UC's dependence on non-renewable energy (UC 2024). The policy covers the areas of green building design, clean energy, climate action, sustainable transportation, sustainable operations, recycling and waste management, sustainable procurement, sustainable food services, and sustainable water systems. The UC Sustainable Practices Policy establishes guidelines and includes climate change goals for all campuses. It also requires each campus to complete an update of its CAP with the goal of reducing GHG emissions to 90 percent below 2019 levels by 2045 (UC 2024). The specific directives of the UC Sustainable Practices Policy are described in more detail in the evaluation of policy consistency in Section 3.6.3.2.

3.6.2.4 UC SAN DIEGO

UC San Diego Climate Action Plan

As described in the 2018 LRDP EIR, in 2008, UC San Diego approved the first campus CAP for implementing its climate strategy to meet state and UC climate policies and objectives, including reducing GHG emissions to 1990 levels by 2020, achieving climate neutrality for Scope 1 and 2 emissions by 2025, and continuing to certify new and existing buildings under the LEED rating system. The CAP also identified how the campus would include climate neutrality and sustainability in curriculum and research, identifies goals for reducing emissions and impacts from purchasing, campus operations, transportation, and water usage, and identifies mechanisms for tracking progress and financing mechanisms.

The update to the 2008 CAP anticipated in the 2018 LRDP EIR was adopted in 2019 and provides a climate change mitigation strategy for meeting the UCOP's Carbon Neutrality Initiative (2013) committing each campus to achieve carbon neutrality in scopes 1 and 2 emissions by 2025, and full carbon neutrality in scopes 1, 2, and 3 by 2050. The development of the updated CAP was based on work initiated by UC San Diego's Student Sustainability Collective, with support from campus staff.

The May 2023 revision to the UC Sustainable Practices Policy committed each campus to prepare an updated CAP to establish and achieve a 90 percent reduction in total GHG emissions by no later than calendar year 2045 relative to a 2019 baseline year. UC San Diego is currently in the process of updating the CAP to provide a climate change mitigation strategy directed at achieving this target. The updated CAP is expected to be completed in 2025. The updated CAP will also integrate climate adaptation and resilience considerations.

UC San Diego Decarbonization Study

At the direction of the UC Sustainable Practices Policy, UC San Diego completed a "Decarbonization Study" in 2024 to identify decarbonization, sustainability, electrification, and energy savings actions that will allow the campus to achieve a 90 percent reduction in its emissions from the combustion of fossil fuels on campus by 2045. The proposed actions range from comprehensive plans for entire campus systems to individual building energy improvements. The Decarbonization Study creates a high-level plan that acts as a road map to implement campus decarbonization, electrification and sustainability efforts. It evaluates potential energy alternatives to the existing natural gas cogeneration plant, the other major campus natural gas loads, and to the current fossil fuel transportation fleet, as well as an evaluation of required upgrades to the campus electrical infrastructure. The plan identifies specific actions that UC San Diego can take reduce Scope 1 carbon emissions by UC Sustainable Practices Policy target years of 2030, 2035, 2040, and 2045, using current or emerging technologies and leveraging strategies and projects that have already been identified and are underway. The key strategies to phase out fossil fuel use by 2045 include:

- Replace the natural gas boilers at the campus' cogeneration Central Utilities Plant with electrode boilers.
- Replace-gas-fired heating systems with electric air and water source heat pumps.
- Reduce peak heating requirements to avoid costly electrical upgrades through energy efficiency measures, thermal energy storage and backup gas heating and steam systems.
- Maximize solar photovoltaic systems, solar thermal systems, and battery storage.
- Continue to monitor emerging, carbon-free technologies over time.

UC San Diego 2018 LRDP GHG Reduction Actions

The following GHG reduction actions were included as part of the 2018 LRDP:

- Action A: Green Building Design. Consistent with the UC Sustainable Practices Policy, all new building or major renovation projects must not use onsite fossil fuel combustion (e.g., natural gas) for space and water heating (except those projects connected to an existing campus central thermal infrastructure).

- Action B: Carbon Neutral Grid Purchased Power. Consistent with the UC Sustainable Practices Policy, by 2025, all purchased electricity would be 100 percent carbon neutral electricity.

An additional reduction action was included in 2018 (formerly GHG Reduction Action A) that set a goal to switch the campus cogeneration plant to 40 percent biogas by 2030. This action was removed as part of the Update because it was superseded by the goal in the 2024 Decarbonization Study to replace the natural gas boilers at the cogeneration plant with electrode boilers (see above).

UC San Diego GHG Reduction Actions A and B would be implemented by the campus at a programmatic level and, as such, are included in the analysis as components of the Update to the 2018 LRDP.

3.6.2.5 REGIONAL AND LOCAL (NON-REGULATORY)

The University of California is exempt from local regulation under California Consitution Article 9, Section 9; however, information related to changes in regional and local plans from those described in the 2018 LRDP EIR is included below for informational purposes.

SANDAG

San Diego Forward: The 2021 Regional Plan

SANDAG's 2021 Regional Plan is the long-range planning document developed to address the San Diego region's housing, economic, transportation, environmental, and overall quality-of-life needs (SANDAG 2021). The Regional Plan is a 30-year plan that considers how the San Diego region will grow, where residents will live, and how residents and visitors will move around the region. It combines the Regional Transportation Plan (RTP), Sustainable Communities Strategy (SCS), and Regional Comprehensive Plan. Per SB 375, described further in Section 3.6.2.2 of the 2018 LRDP EIR, the SCS must provide a land use strategy for the region that achieves GHG emissions reduction targets set by the CARB. The following are the "5 Big Moves" identified in the 2021 Regional Plan, including use of complete corridors; a transit leap to provide a network of high-capacity, high-speed, and high-frequency transit service; mobility hubs where high concentrations of people, destinations, and travel choices converge; flexible fleets to provide a variety of on-demand shared vehicles including micro transit, bikeshare, scooters, and other modes of transportation that connect to transit; and "Next Operating System", a digital platform that ties the transportation system together in real time.

- **Complete Corridors**: Roadways that offer dedicated, safe space for everyone, including people who walk, bike, drive, take transit, and use Flexible Fleets, as well as those who drive freight vehicles. Complete Corridors use technology to dynamically manage the flow of traffic.

- **Transit Leap**: A complete network of fast, convenient, and reliable transit services that connect people from where they live to where they want to go.

- **Mobility Hubs**: Vibrant centers of activity where transit and on-demand travel options, supported by safe streets, connect people with their destinations and businesses with their customers. Mobility Hubs are also planned to accommodate future growth and development.

- **Flexible Fleets**: Transportation services of many forms, varying in size from bikes to scooters to shuttles, that offer first- and last-mile connections to transit and alternatives to driving alone.

- **Next OS**: The underlying technology that allows people to connect to transportation services and a digital platform that allows for dynamic management of roadways and transit services.

West Campus and East Campus areas of the UC San Diego La Jolla campus are identified in the 2021 Regional Plan as being located within a Mobility Hub and therefore are areas recommended for future growth and development under SANDAG's Regional Plan.

County of San Diego

San Diego County Climate Action Plan Update and General Plan Amendment

As described in the 2018 LRDP EIR, the San Diego County Board of Supervisors adopted a CAP in February 2018 to serve as a long-term programmatic plan identifying strategies and measures to meet San Diego County's targets to reduce GHG emissions by 2020 and 2030, consistent with the state's legislative GHG reduction targets. Subsequently, in March 2018, several petitioners filed a lawsuit against the County of San Diego. In December 2018, the San Diego County Superior Court issued a writ ordering the approval of the CAP and the CAP Supplemental EIR to be set aside. In January 2019, the County of San Diego appealed the San Diego County Superior Court's ruling, but the Fourth District Court of Appeal, Division One (Case No. D064243) upheld the trial Superior Court's ruling. In September 2020, the San Diego County Board of Supervisors voted to rescind the CAP and Supplemental EIR. The County of San Diego was directed to prepare a new CAP (CAP Update). The new Draft CAP and Draft Supplemental EIR were available for public review from October 26, 2023, to January 5, 2024. Draft Final CAP Update documents were considered by the County Planning Commission on June 14, 2024 and adopted by the Board of Supervisors on September 11, 2024 (County of San Diego 2024).

City of San Diego

City of San Diego 2022 Climate Action Plan

On August 2, 2022, the San Diego City Council adopted the 2022 CAP update to establish a community-wide goal and roadmap to net-zero emissions by 2035. The 2022 CAP includes the following six strategies: decarbonization of the built environment, access to clean and renewable energy, mobility and land use, circular economy and clean communities, resilient infrastructure and healthy ecosystems, and emerging climate actions (City of San Diego 2022). The City of San Diego is in the process of preparing an implementation plan to achieve the goals of the 2022 CAP.

As proposed in the 2022 CAP, in October 2022, the San Diego City Council approved an amendment to the Land Development Code (San Diego Municipal Code Chapter 14, Article 3, Division 14), which established the CAP Consistency Regulations. The CAP Consistency Regulations replaced the CAP Consistency Checklist previously established by the 2015 CAP as the measures that could be implemented on a project-by-project basis pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Implementation of these measures would ensure that new development projects are consistent with relevant CAP strategies that work toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the CAP for the cumulative impact analysis of GHG emissions.

3.6.3 PROJECT IMPACTS AND MITIGATION

3.6.3.1 ISSUE 1 — GENERATE GHG EMISSIONS

Greenhouse Gas Emissions Issue 1 Summary

Would implementation of the Update to the 2018 LRDP generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Decarbonization of the Central Utilities Plant (GHG-1A) and Electric Charging Stations (GHG-1B).

Summary of Analysis in the 2018 LRDP EIR

Analysis of GHG emissions impacts was provided in Section 3.6.3.1 of the 2018 LRDP EIR, which identified potentially significant impacts given emissions would exceed efficiency metrics developed for consistency with California's GHG emissions reduction goals. The analysis concluded that with implementation of GHG-reducing actions, buildout of the 2025 Scenario would generate 4.00 MT CO_2e/capita and result in a less than significant impact. However, emissions for the 2035 Scenario with implementation of the GHG reducing actions would total 3.57 MT CO_2e/capita and result in a potentially significant impact. The 2018 LRDP EIR prescribed three mitigation measures to reduce emissions associated with the 2035 Scenario: GHG-1A required the decarbonization of the cogeneration plant after 2032; GHG-1B required the installation of electric vehicle chargers; and GHG-1C required UC San Diego to prepare annual inventory updates and purchase carbon credits to achieve a campus-wide emission rate of no more than 2.36 MT CO_2e/capita. Impacts were concluded to be less than significant with the implementation of these mitigation measures.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The proposed increases in building space and campus population associated with the Update to the 2018 EIR could result in increased GHG emissions.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

The significance of GHG emissions for the 2018 LRDP was based on efficiency metrics developed for consistency with California's GHG emissions reduction goals set by AB 32, SB 32, and EO S-3-05. Since certification of the 2018 LRDP EIR, California has adopted the 2022 Scoping Plan, which lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The UC Sustainable Practices Policy sets an even more aggressive goal, directing UC campuses to reduce GHG emissions to 90 percent below 2019 levels by 2045 (UC 2024). Therefore, the significance criteria used in the 2018 LRDP EIR must be updated, and a new efficiency metric is described below.

In addition, the current UC Sustainable Practices Policy explicitly states, "Voluntary offsets purchased to meet obligations under the California Environmental Quality Act…will not count toward a location's GHG reduction targets" (Section III.C.6.a. of the UC Sustainable Practices Policy). Mitigation measure GHG-1C from the 2018 LRDP required annual inventory updates and the purchase of carbon credits to reduce GHG emission impacts below a level of significance. However, with the change in the UC Sustainable Practices Policy, even if carbon credits were purchased, they could not be used to achieve the thresholds developed to demonstrate quantified consistency with the UC Sustainable Practices Policy targets.

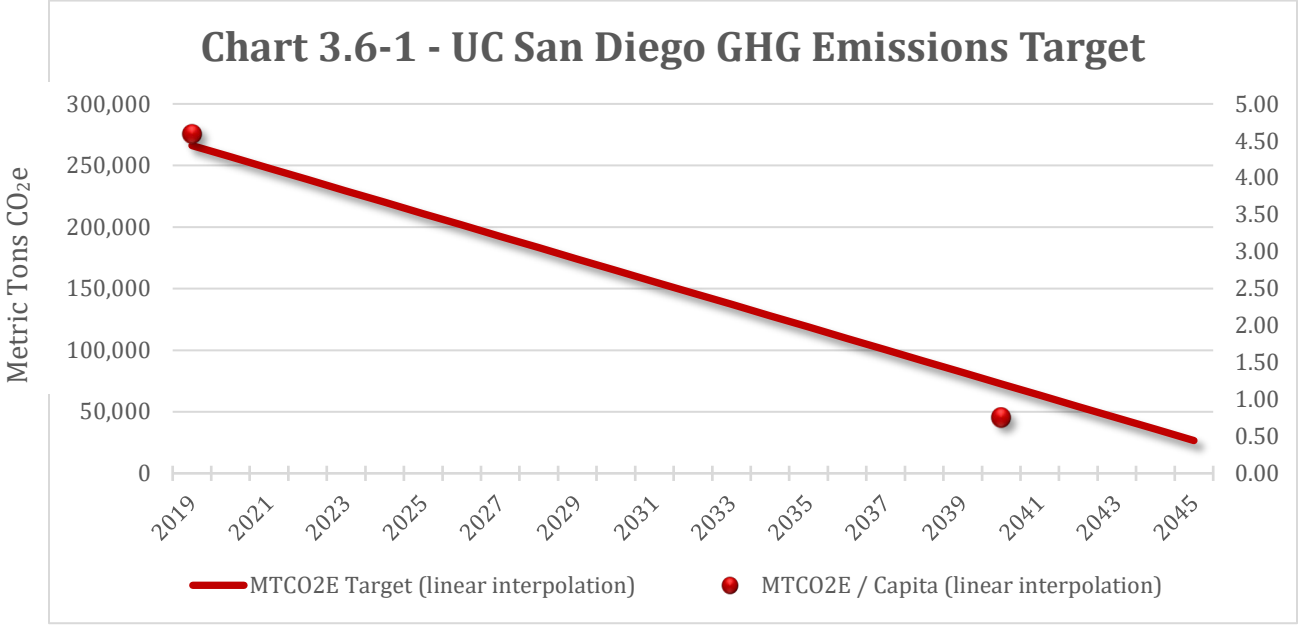
Standards of Significance

The significance of GHG emissions for the 2018 LRDP was based on efficiency metrics developed for consistency with California's GHG emissions reduction goals set by AB 32, SB 32, and EO S 3 05. Since the adoption of the 2018 LRDP, California has adopted the 2022 Scoping Plan, which lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The updated UC Sustainable Practices Policy sets an even more aggressive goal than the state, directing UC campuses to reduce GHG emissions to 90 percent below 2019 levels by 2045 (UC 2024). Therefore, the significance of emissions generated by the Update to the 2018 LRDP is evaluated against a UC San Diego-specific efficiency metric developed based on UC San Diego's GHG inventory and targets consistent with the UC Sustainable Practices Policy. By achieving the more aggressive targets set by the UC Sustainable Practices Policy, the Update to the 2018 LRDP would also achieve the state's targets.

To develop efficiency metric targets, one simply divides the mass emissions target by the total residential population and employment, yielding an emissions "budget" per population + employment that is consistent with intended goals. Since the Update to the 2018 LRDP includes both a residential component (e.g., beds) and an employment component (e.g., educational, research, healthcare, and office), "service population" is the selected metric used to convert mass emissions to a rate of emissions. An efficiency metric is the quantity of emissions that can be permitted on a per capita basis without significantly impacting the environment. This approach focuses on the overall GHG efficiency of a project relative to regulatory GHG reduction goals.

The UC Sustainable Practices Policy calls for each campus to achieve a 90 percent reduction in total emissions by no later than calendar year 2045 relative to 2019 emissions (Section III.C.1. of the UC Sustainable Practices Policy). The 2019 UC San Diego GHG inventory shows emissions totaling 266,174 MT CO_2e (refer to Table 3.6-2; UC San Diego 2020); thus, the 2045 target would be 26,617

MT CO_2e. The GHG target for the Update to the LRDP buildout year, 2040, is calculated using linear interpolation. The trend line and calculated efficiency metric are illustrated in Chart 3.6-1, UC San Diego GHG Emissions Target. Table 3.6-3, *UC San Diego Efficiency Metric,* presents the emissions targets and calculated efficiency metric being applied in this analysis.



Note: Trendline is based on 90% reduction from 2019. 2045 population is unknown, therefore, no per capita target can be estimated for 2045

Table 3.6-3
UC San Diego Efficiency Metric

	2019	2040
Target (MT CO_2e)	266,174	72,686
Population (students, faculty, and staff)	57,900	96,300
Efficiency Metric (MT CO_2e/capita)	4.60	0.75

Note: 2019 values are per UC San Diego 2020. 2040 values are estimates based on growth projections and targets set in UC 2024.

MT = metric ton; CO_2e = carbon dioxide equivalent

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

Development resulting from the Update to the 2018 LRDP would result in GHG emissions during both construction and operations. Emissions were calculated using development projections provided by UC San Diego and appropriate models and emission factors for the construction and operational sources. Operational GHG emissions were estimated for the buildout of the Update to the 2018 LRDP assumed to occur in 2040. Detailed assumptions by source type are provided below.

Construction Emissions

Sources of construction-related GHG emissions include construction equipment exhaust; construction-related trips by workers, delivery trucks, and material-hauling trucks; and construction-related power consumption. The quantity of GHG emissions generated by the construction of projects in any given year under the Update to the 2018 LRDP would vary depending upon the number of projects occurring and the size of each individual project. Since the Update to the 2018 LRDP is a land use plan that guides physical development of the campus through 2040, specific construction details, such as the exact number and timing of all development projects are uncertain. The intensity of construction activity associated with the Update to the 2018 LRDP could be the same during each year. It is more likely, however, that some periods of construction (and associated emissions) would be more intense than other periods based on campus growth priorities and associated development demands.

To evaluate the potential construction-related GHG emissions from projects that could occur under the Update to the 2018 LRDP, average annual construction emissions were estimated by dividing total anticipated construction-related GHG emissions over the length of the plan. Based upon current UC San Diego projections of construction activity, the Update to the 2018 LRDP includes construction over two scenarios: projects that could potentially be built by 2030 (2030 Scenario) and projects that could potentially be built between 2030 and 2040 (2040 Scenario).

Construction period GHG emissions were estimated using CalEEMod, version 2022.1, which is described further in Section 3.2.3.2 of this SEIR. CalEEMod includes default estimates on the required construction equipment, phases, and activities when project-specific information is unavailable. The default estimates are based on surveys of typical construction projects, which provide a basis for scaling equipment needs and schedule with a project size.

Operational Emissions – Area Sources

Area-source emissions would be associated with the use of landscaping and maintenance equipment and fireplaces/fire pits. Landscaping emissions are based on land use and building square footage along with emission rates provided in CARB's Small Off-Road Engines Model v1.1. The modeling analysis for the area sources used model default emissions factors, as well as specific campus project features associated with new developments. For example, since the land uses involve on-campus apartments and residence halls, the Update to the 2018 LRDP is not anticipated to include any natural gas or wood fireplaces.

Operational Emissions – Mobile Sources

Trip generation associated with the Update to the 2018 LRDP SEIR was estimated using an updated approach compared to the 2018 LRDP EIR; see the Issue 2 discussion in Section 3.2, Air Quality, of this SEIR for a description. Using this new refined methodology, the ADT for buildout of the Update to the 2018 LRDP were estimated to be approximately 73,915 trips in 2040 (LLG 2025). The weekday VMT for buildout of the Update to the 2018 LRDP were estimated to be approximately 657,476 miles in 2040 (LLG 2025). Mobile source emissions for trips and miles traveled were estimated using CalEEMod.

GHG emission estimates were also calculated for business travel (i.e., Scope 3 emissions) based on estimates provided in TCR entity report for emissions year 2022 (UC San Diego 2024a). The

estimates of business travel were increased proportionally to the increase in total campus population estimated for 2040.

Operational Emissions – Energy Sources

UC San Diego's energy use includes electricity generated on campus at the campus cogeneration plant, electricity purchased from SDG&E, and natural gas purchased from SDG&E. An important element of the campus's energy use and energy-related infrastructure is its centralized cooling and heating systems and cogeneration operations for on-site electric power production. See Section 3.5, Energy, of this SEIR for additional details.

Electricity and natural gas consumption for the campus were based on the estimates provided in the *Decarbonization Study Prepared for University of California, San Diego* (Salas O'Brien 2024). Consistent with the Green Building Design requirements of the UC Sustainable Practices Policy, new facilities would be electric only. As a Direct Access customer, UC San Diego obtains its purchased electricity via the UC Energy Services Unit, which is 100 percent carbon neutral.

Operational Emissions – Water and Wastewater Sources

GHG emissions are generated from the use of energy to supply, distribute, and treat water and wastewater. Water-related energy intensities (i.e., kilowatt-hour per gallon of water) in CalEEMod are based on the California Energy Commission's Refining Estimates of Water-Related Energy Use in California.

Water consumption and wastewater generation estimates for buildout of the Update to the 2018 LRDP were obtained from UC San Diego's Update to the 2018 LRDP Domestic Water Study (Latitude 33 Planning & Engineering 2024). Latitude 33 Planning & Engineering reported UC San Diego's campus flow rates are projected to be an average of 4.46 million gallons per day (MGD) in 2040.

Operational Emissions – Solid Waste Sources

GHG emissions associated with solid waste disposal for the Update to the 2018 LRDP were calculated assuming the same waste generation rate per capita as provided in the 2018 LRDP EIR GHG analysis (AECOM 2018). Solid waste was estimated based on projected UC San Diego population. The analysis conservatively assumed a waste diversion rate consistent with the 2022 to 2023 academic year of 73 percent for all future years, though the diversion rate is expected to continue to increase over time as campus solid waste reduction programs progress (UC San Diego 2024b).

Operational Emissions – Stationary Sources

Stationary sources include equipment that burns fossil fuel, typically either natural gas or diesel fuel, to generate either heat or electricity. Stationary sources on campus that burn natural gas include the BSB crematory, the Moores Cancer Center thermal Fluid heaters, central utilities cogeneration turbines and boilers, and other boilers located throughout campus. Emissions associated with stationary sources burning natural gas are estimated following the methods for energy sources described above, using campuswide natural gas consumption rates included in the Decarbonization Study (Salas O'Brien 2024). Stationary sources that burn diesel fuel include emergency generators.

Activity data, such as fuel consumption rates and operating time, were used to estimate emissions from diesel emergency generators. GHG emission factors were obtained from CARB's Mobile Source Emissions Inventory for off-road equipment. Operational emissions for emergency generators would result from intermittent use for maintenance and testing purposes. Future diesel emergency generators were based on a comparison of recently approved campus projects (Ridge Walk North Living and Learning Neighborhood and Theater District Living and Learning Neighborhood) versus proposed square footage.

Additionally, stationary source emissions would include leaks, servicing, and disposal of equipment that use hydrocarbons, such as refrigerants, aerosol propellants, foam blowing agents, solvents, and fire retardants. Emissions from refrigerant use were estimated using CalEEMod default values by land use type and quantity.

Greenhouse Gas Reduction Actions

As noted in Section 3.6.2.3 above, UC San Diego GHG Reduction Actions A (Green Building Design) and B (Carbon Neutral Grid Purchased Power) would be implemented by the campus at a programmatic level and, as such, are included in the analysis as components of the Update to the 2018 LRDP.

Impact Analysis

Construction Emissions

Construction associated with implementing projects under the Update to the 2018 LRDP could occur in different portions of the campus at a given time. Construction emissions were estimated separately for the West Campus, East Campus, and SIO, as shown in Table 3.6-4, *Construction-Related Greenhouse Gas Emissions*. However, since construction activities could occur in all three areas at the same time, emissions from each area were also combined.

Table 3.6-4
Construction-Related Greenhouse Gas Emissions

Campus	Emissions (MT CO_2e)
2030 Scenario (2025-2029)	
West Campus	13,432
East Campus	15,535
SIO	5,027
Total	**33,994**
2040 Scenario (2030-2040)	
West Campus	21,792
East Campus	14,346
SIO	9,041
Total	**45,178**
Total Construction Emissions[1]	**79,172**
Amortized Construction Emissions	**2,639**

Source: HELIX 2025
[1] Total Construction Emissions are the sum of GHG emissions under the 2030 and 2040 Scenarios, or the total construction-related emissions associated with the Update to the 2018 LRDP.
Note: Totals may not sum due to rounding.
MT CO_2e = metric tons carbon dioxide equivalent; SIO = Scripps Institution of Oceanography

As shown in Table 3.6-4, construction activities would generate a total of 79,172 MT CO_2e. This can be compared to and is slightly greater than the total construction emissions estimated for the 2018 LRDP of 70,089 MT CO_2e. For construction emissions, the standard practice for environmental impact analysis purposes is that the emissions be amortized (i.e., averaged) over 30 years and added to operational emissions. Averaged over 30 years, the construction activities would contribute approximately 2,639 MT CO_2e emissions per year.

Operational Emissions

Operational GHG emissions were estimated for buildout of the Update to the 2018 LRDP assumed to occur in 2040. As described in the methodology and assumptions above, UC San Diego GHG Reduction Actions A and B would be implemented by the campus as part of the Update to the 2018 LRDP and, as such, are included in the analysis as components of the Update to the 2018 LRDP. Table 3.6-5, *Estimated Annual Greenhouse Gas Emissions with UC San Diego GHG Reduction Actions*, presents the emissions for buildout of the Update to the 2018 LRDP with implementation of UC San Diego GHG Reduction Actions A and B that are proposed as part of the Update to the 2018 LRDP.

Table 3.6-5
Estimated Annual GHG Emissions with UC San Diego GHG Reduction Actions

Source	2040 Emissions (MT CO_2e/year)
Area Sources	216
Generators	293
Purchased Electricity	0
Natural Gas	190,131
Mobile	50,280
Solid Waste	2,438
Water	862
Business Travel	5,508
Refrigerants	91
Operational Emissions	***249,819***
Annual Construction Emissions	2,639
Total Annual Emissions	**252,458**
Service Population	96,300
Emissions Per Service Population	**2.62**
Efficiency Threshold	0.75
Exceeds Threshold?	**Yes**

Source: HELIX 2025
Note: Totals may not sum due to rounding.
MT CO_2e = metric tons carbon dioxide equivalent

Based on the total GHG emissions presented in Table 3.6-5, the analysis estimated emissions of approximately 252,458 MT CO_2e, or 2.62 MT CO_2e per service population, per year in 2040. As such, buildout of the Update to the 2018 LRDP would exceed the emissions per service population threshold of 0.75 MT CO_2e. Therefore, implementation of the Update to the 2018 LRDP could result in the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Although the 2040 GHG inventory demonstrates a downward trend in GHG emissions when compared to the 2025 and 2035 GHG inventories presented in the 2018 LRDP EIR, implementation of the Update to the 2018 LRDP, in the unmitigated scenario, would not achieve the

efficiency target developed to show substantial progress toward the UC Sustainable Practices Policy's 2045 target.

Level of Significance Before Mitigation

As described above, impacts would be potentially significant for the Update to the 2018 LRDP, consistent with the conclusion of the 2018 LRDP EIR.

Mitigation Measures

Measures removed from the 2018 LRDP EIR:

Mitigation measure GHG-1C from the 2018 LRDP EIR required annual inventory updates and the purchase of carbon credits. This measure has been deemed no longer applicable for two reasons. First, as mentioned in Section 3.6.2.3, the UC San Diego campus is currently updating the 2019 CAP to ensure that the campus meets the goals in the latest update to the UC Sustainable Practices Policy and is developing a strategy to achieve a 90 percent reduction in total GHG emissions by no later than calendar year 2045 relative to a 2019 baseline year. Part of the implementation of the strategy would be to monitor emissions annually, as required by the UC Sustainable Practices Policy. Second, the updates to the UC Sustainable Practices Policy, upon which the Update to the 2018 LRDP's thresholds are based, explicitly state "Voluntary offsets purchased to meet obligations under the California Environmental Quality Act…will not count toward a location's GHG reduction targets" (Section III.C.6.a. of the UC Sustainable Practices Policy). Therefore, even if carbon credits were purchased to reduce the Update to the 2018 LRDP's emissions, they could not be used to achieve the thresholds developed to demonstrate quantified consistency with the UC Sustainable Practices Policy targets. For these reasons, mitigation measure GHG-1C from the 2018 LRDP EIR has been removed.

Revised mitigation measures for the Update to the 2018 LRDP:

Revisions to mitigation measures GHG-1A and GHG-1B have been made to provide clarification that the decarbonization will apply to the entire Central Utilities Plant and to update timing requirements of these measures in alignment with buildout of the Update to the 2018 LRDP. Changes have been tracked below with strikeout and underlined text denoting text removals and additions, respectively, as compared to the mitigation measure language found in the 2018 LRDP EIR.

GHG-1A **Decarbonization of the ~~Cogeneration~~ Central Utilities Plant**. UC San Diego shall decarbonize ~~of~~ the ~~cogeneration plant~~ Central Utilities Plant ~~after 2032~~ before 2040. Decarbonization could take one of the several paths, including electrification, biomass, complete conversion to directed biogas possibly augmented with renewably produced hydrogen (if available), or new technology.

GHG-1B **Electric Charging Stations**. UC San Diego shall continue to expand and update the on-campus alternative fueling infrastructure by installing electric vehicle chargers ~~by 2035~~ to be available for campus fleet and public charging.

Level of Significance After Mitigation

Decarbonization of the Central Utilities Plant required by mitigation measure GHG-1A would lead to a reduction of approximately 185,515 MT CO_2e. The extent to which mitigation measure GHG-1B would be applied could vary depending on the timeline of installation and design as well as subsequent use of the infrastructure. Thus, mitigation measure GHG-1B has conservatively not been quantified at this time. Table 3.6-6, *Estimated Annual Greenhouse Gas Emissions with Mitigation*, presents the emissions for the 2040 Scenario with implementation of mitigation measure GHG-1A.

Table 3.6-6
Estimated Annual Greenhouse Gas Emissions with Mitigation

Source	2040 Emissions (MT CO_2e/year)
Area Sources	216
Generators	293
Purchased Electricity	0
Natural Gas	4,616
Mobile	50,280
Solid Waste	2,438
Water	862
Business Travel	5,508
Refrigerants	91
Operational Emissions	64,304
Annual Construction Emissions	2,639
Total Annual Emissions	**66,943**
Service Population	96,300
Emissions Per Service Population	**0.70**
Efficiency Threshold	0.75
Exceeds Threshold?	**No**

Source: HELIX 2025
Note: Totals may not sum due to rounding.
MT CO_2e = metric tons carbon dioxide equivalent

As shown in Table 3.6-6, emissions would be reduced to approximately 66,943 MT CO_2e, or 0.70 MT CO_2e per service population, per year in 2040 with mitigation. As such, buildout of the Update to the 2018 LRDP would not exceed the emissions per service population threshold of 0.75 MT CO_2e with mitigation. Therefore, implementation of the Update to the 2018 LRDP would achieve the 2040 efficiency target developed to show substantial progress toward the UC Sustainable Practices Policy's 2045 target, resulting in a less than significant impact with mitigation. This can also be compared to, and is less than, the emissions per service population estimated in the 2018 LRDP EIR of 4.00 MT CO_2e per service population in 2025 and 2.36 MT CO_2e per service population in 2035. Impacts related to GHG emissions would be less than significant with mitigation for the Update to the 2018 LRDP, consistent with the conclusion of the 2018 LRDP EIR.

3.6.3.2 ISSUE 2 — CONSISTENCY WITH APPLICABLE PLAN

Greenhouse Gas Emissions Issue 2 Summary

Would implementation of the Update to the 2018 LRDP conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	Yes.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Decarbonization of the Central Utilities Plant (GHG-1A) and Electric Charging Stations (GHG-1B).

Summary of Analysis in the 2018 LRDP EIR

Section 3.6.3.2 of the 2018 LRDP EIR assessed the potential for the 2018 LRDP to result in conflicts with the UC Sustainable Practices Policy in place at the time. The 2018 LRDP was found to be consistent with the UC Sustainable Practices Policy areas of green building, clean energy, climate protection, sustainable transportation, sustainable operations, recycling and waste management, environmentally preferable purchasing, sustainable food services, and sustainable water systems. Further, the 2018 LRDP EIR included three GHG Reduction Actions pertaining to the campus cogeneration plant, green building design, and carbon neutral grid purchased power. Therefore, the 2018 LRDP EIR concluded the 2018 LRDP would not conflict with any applicable plan, policy, or regulation for the purpose of reducing GHG emissions and impacts were considered less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The proposed increases in building space and campus population associated with the Update to the 2018 EIR could result in changes to the consistency of the LRDP with the UC Sustainable Practices Policy; therefore, additional analysis of this topic was provided.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

The UC Sustainable Practices Policy has been revised since the certification of the 2018 LRDP EIR, and there are new policies to be considered in this analysis.

Standards of Significance

State and regional plans have been developed that set goals for the reduction of GHG emissions over the next few years and decades. As discussed in Section 3.6.2.2, CARB released the 2022 Scoping Plan that includes strategies to ensure that California meets its GHG reduction targets consistent with AB 1279. CEQA Guidelines Section 15064.4(b) provides that, among the factors a lead agency should consider in evaluating GHG emissions, is whether the project would comply with "regulations and requirements" that have been adopted by the relevant public agency through a public review process, to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Although the Scoping Plan and other regional plans, such as the SANDAG 2021 Regional Plan, provide overall direction on how the state and region will meet GHG emission reduction goals, there are no regulations or requirements that have been adopted by relevant public agencies to implement those plans within the meaning of CEQA Guidelines Section 15064.4(b). Therefore, no CEQA significance finding will be made based on consistency with these state and regional plans; however, an analysis of consistency with the 2021 Regional Plan, including the SCS, is provided below. Instead, the CEQA significance determination under Issue 2 is based on compliance with UC policies and plans, which themselves are consistent with achievement of the GHG reduction targets in AB 1279.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The UC Sustainable Practices Policy has very aggressive targets for carbon neutrality (90 percent reduction in total emissions by no later than 2045), more so than targets set forth by the State of California pursuant to AB 1279. For purposes of this analysis, and consistent with the 2018 LRDP EIR, the evaluation of the Update to the 2018 LRDP is based on consistency with the UC Sustainable Practices Policy, rather than whether the LRDP meets quantified emission reduction goals. Additional analysis of consistency with the 2021 Regional Plan is provided to assess compliance with regional plans for GHG emissions reduction targets that are also consistent with statewide goals.

Impact Analysis

The UC Sustainable Practices Policy commits UC campuses to implementing actions intended to minimize the UC's impact on the environment in the areas of green building, clean energy, climate action, sustainable transportation, sustainable operations, zero waste, sustainable procurement, sustainable foodservices, and sustainable water systems. The 2021 Regional Plan includes 5 Big Moves intended to create a more sustainable land use pattern and transportation system for the region. Consistency of the Update to the 2018 LRDP with components of these two plans is described below.

UC Sustainable Practices Policy – Green Building Design and Sustainable Operations

The UC Sustainable Practices Policy requires 20 percent or better energy performance compared to Title 24 requirements for new construction and contains different metrics for acute care hospitals and medical office buildings. New buildings on the UC San Diego campus have integrated innovative mechanical and control system technologies into campus facilities, oftentimes achieving more than a 20 percent reduction above Title 24. In addition, new construction and major renovations on the UC San Diego campus would be 100 percent electric and can use an alternative compliance pathway

based on whole-building energy performance targets, now recognized as the best practice method for designing energy efficient buildings. The campus also currently has 58 LEED accredited buildings. UC San Diego has committed to achieving at least LEED Gold Certification (and strives to meet LEED Platinum Certification where possible) for all new buildings, as well as LEED Certification for all major renovations, consistent with the UC Sustainable Practices Policy. Further, the Update to the 2018 LRDP's sustainability goals include optimizing the use of existing facilities, sites, and campus space while embracing sustainable facility designs, which is consistent with building renovations and sustainable operations requirements included within the UC Sustainable Practices Policy. Parking structures are rated per the ParkSmart requirements and UC San Diego has committed to achieving at least ParkSmart Silver in new structures. Lastly, the Update to the 2018 LRDP would continue to include GHG Reduction Action A: Green Building Design, which requires all new building or major renovation projects not to use natural gas for space and water heating. The Update to the 2018 LRDP would therefore not conflict with the Green Building Design provisions of the UC Sustainable Practices Policy.

UC Sustainable Practices Policy – Clean Energy

The UC Sustainable Practices Policy also commits the UC system to obtain 100 percent clean electricity by 2025, which has already been achieved through the Clean Power Program. UC San Diego has built an advanced microgrid system, which is key to creating a carbon neutral campus. The microgrid provides a flexible, resilient, reliable, secure energy distribution system that is capable of generating approximately 85 percent of the electricity used on campus annually. The campus' 2.4 megawatt solar network includes an array of rooftop, carport, and ground mounted systems, including several integrated with advanced energy systems. Additionally, all purchased electricity is 100 percent carbon neutral through the UC Wholesale Power Program.

Power is provided from several sources including the campus' 30-megawatt cogeneration plant and 2.4 megawatts of solar arrays. Cogeneration uses one fuel source (natural gas) to produce two forms of energy (electricity and heat). State-of–the-art gas turbines equipped with pollution controls are 45 to 50 percent more efficient than conventional natural gas power plants and produce 75 percent fewer emissions. As described above in Section 3.6.2.3, at the direction of the UC Sustainable Practices Policy, UC San Diego completed a "Decarbonization Study" in 2024 to identify decarbonization, sustainability, electrification, and energy savings actions that will allow the campus to achieve a 90 percent reduction in its emissions from the combustion of fossil fuels on campus by 2045. The plan identifies specific actions that UC San Diego can take to reduce Scope 1 carbon emissions by UC Sustainable Practices Policy target years of 2030, 2035, and 2045, using current or emerging technologies and leveraging strategies and projects that have already been identified and are underway. The key strategies to phase out fossil fuel use by 2045 include:

- Replace the natural gas boilers at the campus' cogeneration Central Utilities Plant with electrode boilers.
- Replace gas-fired heating systems with electric air and water source heat pumps.
- Reduce peak heating requirements to avoid costly electrical upgrades through energy efficiency measures, thermal energy storage, and backup gas heating and steam systems.
- Maximize solar photovoltaic systems, solar thermal systems, and battery storage.
- Continue to monitor emerging, carbon-free technologies over time.

Because of the goal listed above to replace the natural gas boilers with electrode boilers, the former 2018 LRDP GHG Reduction Action that set a goal to switch the campus cogeneration plant to 40 percent biogas by 2030 was removed as it was superseded by the Decarbonization Study goals. As

discussed under Issue 1, without decarbonization of the cogeneration plant, implementation of the Update to the 2018 LRDP would not achieve the efficiency target developed to show substantial progress toward the UC Sustainable Practices Policy's 2045 target and therefore, impacts would be considered potentially significant. Mitigation measure GHG-1A would be required, as described above under Issue 1.

UC Sustainable Practices Policy – Climate Action

The UC Sustainable Practices Policy commits each campus to prepare an updated CAP to establish and achieve a 90 percent reduction in total GHG emission by no later than calendar year 2045 relative to a 2019 inventory year. As discussed previously under Issue 1, implementation of the Update to the 2018 LRDP would achieve the 2040 efficiency target developed to show substantial progress toward the UC Sustainable Practices Policy's 2045 target with the implementation of mitigation measures GHG-1A and GHG-1B. UC San Diego is also currently in the process of updating the CAP to provide a climate change mitigation strategy directed at achieving this target. Consistent with the directives of the UC Sustainable Practices Policy, the updated CAP will also integrate environmental justice, climate adaptation, and climate resiliency strategies. Therefore, with the implementation of mitigation measures GHG-1A and GHG-1B, of the Update to the 2018 LRDP would not conflict with the UC Sustainable Practices Policy interim goal.

UC Sustainable Practices Policy – Sustainable Transportation

As of July 2024, the UC San Diego fleet consists of approximately 65 percent alternative fuel vehicles, including hybrid electric vehicles, CNG vehicles that use 100 percent renewable CNG, and diesel vehicles that use R-100 renewable diesel. This is consistent with the UC Sustainable Practices Policy requiring at least 50 percent of each campus fleet to be zero emission vehicles or hybrid vehicles by 2025.

Requirements in the UC Sustainable Practices Policy also call for campuses to reduce their percentage of employees and students commuting by single-occupancy vehicles (SOVs) by 10 percent relative to 2015 SOV rates and by 2050 to have no more than 40 percent of employees and no more than 30 percent of all employees and students commuting to the campus by SOV. In the academic calendar year 2023-24, UC San Diego Transportation Services' annual commute mode survey concluded that approximately 44 percent of campus commuters commute via SOV; representing an approximately 5 percent reduction in SOV relative to 2015 SOV rates thereby demonstrating substantial progress towards the 2050 target. To continue to meet the programmatic policy and further reduce SOV rates, the Update to the 2018 LRDP would continue and enhance UC San Diego's extensive TDM measures and provide additional campus housing for students and staff/faculty. The Update to the 2018 LRDP would continue and/or enhance the following TDM programs: commuting/alternative transportation, campus mobility, shuttle service, parking policies, and resources and services. These campus-wide programmatic TDM programs are consistent with the TDM programs recommended in the Sustainable Transportation practices. The UC San Diego Transportation Services Department continually monitors and develops future TDM strategies for UC San Diego's transportation programs and facilities.

The extension of the existing regional San Diego Trolley system to serve the campus was anticipated in the 2018 LRDP EIR and has since begun operations, providing a connection between the UC San Diego campus and downtown San Diego, as well as the Old Town Transit Center. UC San Diego is served by two stations on campus, and two additional stations nearby. Additionally, the

campus shuttle service offers nine primary shuttle routes, which reduce vehicle trips between key locations on and off campus.

The additional housing included within the Update to the 2018 LRDP would also reduce the need for students, staff, and faculty to commute to campus, while also decreasing the campus' transportation impacts on the region. The trip generation analysis evaluated the proposed daily trips from students, staff, and faculty to the campus. The commute mode split analysis includes a reduction to the ADT of 19 percent based on the number of on campus student residents (LLG 2025).

Consistent with the Sustainable Transportation practices, the Update to the 2018 LRDP would develop parking structures only as needed and after careful consideration of anticipated demands and programmatic needs to accommodate growth of the campus. This includes considering opportunities to co-locate parking structures with other facilities (e.g., housing, office, academic) to minimize construction of new parking facilities. In addition, existing parking policies at UC San Diego, including the requirement to pay for parking and restrictions for first and second year student parking permits, discourage SOV use. In addition, implementation of mitigation measure GHG-1B would further expand and update the on-campus fueling infrastructure by installing electric vehicle chargers. The Update to the 2018 LRDP is therefore consistent with the Sustainable Transportation provisions of the UC Sustainable Practices Policy.

UC Sustainable Practices Policy – Sustainable Building and Laboratory Operations for Campuses

As discussed previously, new buildings on the UC San Diego campus would be required to adhere to the UC Sustainable Practices Policy requiring 20 percent or better energy performance compared to Title 24 requirements, or achieve another applicable metric for medical office/hospital buildings. In addition, new construction and major renovations on the UC San Diego campus would be 100 percent electric and all electricity would be 100 percent renewable. Laboratory buildings will be designed, constructed, and commissioned to achieve a minimum of LEED Gold Certification as well as meeting the prerequisites of the Laboratories for the 21st Century (Labs21) Environmental Performance Criteria. The Update to the 2018 LRDP would therefore not conflict with the Green Building Design provisions of the UC Sustainable Practices Policy.

UC Sustainable Practices Policy – Zero Waste

To measure compliance with UC's zero waste goal, campuses need to meet or exceed 90 percent diversion of municipal solid waste. UC San Diego has developed a Zero Waste Plan to meet the UC zero waste goal. This Zero Waste Plan is a living document and will be continually updated to reflect new programs with UC San Diego's waste hauler; changes in regional infrastructure and partnerships; new technologies for zero waste; new city, regional, state and UC-wide policies and regulations; and the transformation of the campus as outlined in its LRDP (UC San Diego 2019). The Update to the 2018 LRDP would implement diversion and source reduction strategies identified in the Zero Waste Plan. In the 2022-23 academic year, the campus achieved a diversion rate of 73 percent of solid waste (UC San Diego 2024b). In addition, the campus is tracking construction and demolition waste for all capital projects. The Update to the 2018 LRDP would not conflict with the Zero Waste provisions of the UC Sustainable Practices Policy.

UC Sustainable Practices Policy – Sustainable Procurement

UC San Diego's Integrated Procure-to-Pay Solutions (IPPS) is comprised of several integrated units that represent all of the procurement, fulfillment, and payment functions of UC San Diego. IPPS has a commitment to local, diverse small businesses, advocating for sustainable purchasing practices, and utilizing innovative tools that streamline campus purchasing. IPPS practices Environmentally Preferable Purchasing by procuring items that have minimized or reduced environmental effects. Below are a few examples of what UC San Diego's IPPS is currently doing to make the campus supply chain more sustainable.

Thermo Fisher: Tote Program

In July 2015, IPPS partnered with Thermo Fisher, the campus' largest agreement lab supply distributor, to develop the nation's first reusable tote program in higher education. By utilizing these reusable totes, UC San Diego is eliminating hundreds of cardboard boxes from the campus supply chain. Every ton of cardboard saved equates to saving 17 trees, 380 gallons of oil, 4,000 kilowatts of energy, and 7,000 gallons of water.

VWR International: Pallet Program

In June 2015, IPPS partnered with VWR International, the campus' second largest agreement lab supply distributor, to develop VWR's first reusable pallet program in higher education. These reusable pallets can be used hundreds of times with an average lifespan of 10 years. A similar program is currently being developed with Thermo Fisher and is scheduled to launch in the second quarter of the next fiscal year.

Thermo Fisher: Expanded Polystyrene Program

UC San Diego is the only university in the UC system that has an expanded polystyrene program (Styrofoam) cooler reuse program in place with Thermo Fisher, the system's largest agreement life sciences reagent supplier. This program was developed in 2012 in partnership with Core Bio Services and has prevented thousands of pounds of Styrofoam waste from coming to campus. This program continues to improve year over year and has sent back and reused more than 1,375 coolers.

This existing strategy is anticipated to continue with implementation of the Update to the 2018 LRDP. Therefore, the Update to the 2018 LRDP would not conflict with the Sustainable Procurement provisions of the UC Sustainable Practices Policy.

UC Sustainable Practices Policy – Sustainable Foodservices

UC San Diego is working to achieve the goals of the UC Sustainable Practices Policy to procure 25 percent sustainable food products by the year 2030. As of fiscal year 2022-2023, UC San Diego has achieved 18 percent sustainable food spend and 23 percent plant-based food spend. Actions taken by UC San Diego include the sale of Fair Trade Certified coffee and sugar at the markets and dining locations, cage-free eggs, and seafood sourced from certified Marine Stewardship Council or certified by the Monterey Bay Aquarium Seafood Watch. UC San Diego launched the Triton2Go Mobile Ordering App and Reusable Container Program in the Fall Quarter 2020 resulting in the diversion of more than 945,000 single-use containers from the landfill. Markets and dining hall kitchens have been composting pre-consumer food waste since 2009 and launched post-consumer

food waste collection Fall Quarter 2020. These existing strategies are anticipated to continue with implementation of the Update to the 2018 LRDP. Therefore, the Update to the 2018 LRDP would not conflict with the Sustainable Foodservices provisions of the UC Sustainable Practices Policy.

UC Sustainable Practices Policy – Sustainable Water Systems

UC San Diego saves millions of gallons of water annually through implementation of a comprehensive Water Action Plan. Per the UC Sustainable Practices Policy, locations will reduce the growth-adjusted potable water consumption 36 percent by 2025, when compared to a three-year average baseline of fiscal years 2005/06, 2006/07, and 2007/08. This target has already been achieved with UC San Diego observing a 38 percent reduction in water use from baseline in 2023 and a 59 percent reduction in water use from baseline in 2024. The campus will continue to incorporate design features, technological adaptations, and/or planning principles into future campus projects to conserve resources and minimize waste products. Consistent with the UC Sustainable Practices Policy, the Update to the 2018 LRDP promotes the efficient use of water and contains goals such as minimizing water use by further extending reclaimed water infrastructure and through innovative water capture techniques. The Update to the 2018 LRDP is therefore consistent with the Sustainable Water Systems provisions of the UC Sustainable Practices Policy.

2021 Regional Plan – 5 Big Moves

The Update to the 2018 LRDP proposes a land use and growth pattern consistent with the 5 Big Moves of the 2021 Regional Plan: Complete Corridors, Transit Leap, Mobility Hubs, Flexible Fleets, and Next OS. UC San Diego creates complete streets throughout campus to allow for safe and efficient circulation via walking, biking, and public transportation. While the Update to the 2018 LRDP does not propose specific new transit infrastructure, the recent opening of the San Diego Trolley stations on campus and the continued service of the UC San Diego shuttle system would provide public transit throughout campus consistent with the Transit Leap big move. The Gilman Transit Center in the heart of the campus also provides direct access to several local and regional public bus routes. As a result of the robust public transportation system available to and from campus, the majority of the campus is within a Mobility Hub; therefore, the proposed growth within this area is consistent with the strategy of the 2021 Regional Plan to focus growth where high-quality transit is available. As described further in Section 3.10, Transportation and Circulation, UC San Diego supports flexible fleets via its TDM program, which includes support for shared scooter and car programs on campus. UC San Diego provides shuttle alerts and real-time updates via the TransLoc mobile application. The Update to the 2018 LRDP would support the 5 Big Moves identified in the 2021 Regional Plan, thereby contributing to the GHG reduction strategy for the region.

Level of Significance Before Mitigation

As described above, the Update to the 2018 LRDP would be consistent with the following aspects of the UC Sustainable Practices Policy: Green Building Design and Sustainable Operations, Sustainable Building and Laboratory Operations for Campuses; Zero Waste; Sustainable Procurement; Sustainable Foodservices; Sustainable Water Systems; and Sustainable Transportation.

With regards to the Clean Energy and Climate Action components of the UC Sustainable Practices Policy, impacts would be potentially significant, due in part to the former GHG Reduction Action that required a switch to biogas for the cogeneration plant being removed as part of the Update to

the 2018 LRDP because it was superseded by the goal in the 2024 Decarbonization Study to replace the natural gas boilers at the cogeneration facility with electrode boilers.

The Update to the 2018 LRDP SEIR would be consistent with the 2021 Regional Plan.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

No mitigation was included.

Revised mitigation measures for the Update to the 2018 LRDP:

Mitigation measures GHG-1A and GHG-1B would be required, as listed above under Issue 1.

Level of Significance After Mitigation

With implementation of the above mitigation measures, impacts would be reduced to a less than significant level.

3.6.4 CUMULATIVE IMPACTS AND MITIGATION

Greenhouse Gas Emissions Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative greenhouse gas emissions impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Generate GHG Emissions.	Significant.	Not cumulatively considerable.	Significant.	Not cumulatively considerable with GHG-1A and GHG-1B.
Consistency with Applicable Plan.	Significant.	Not cumulatively considerable.	Significant.	Not cumulatively considerable with GHG-1A and GHG-1B.

The geographic scope of consideration for GHG emissions is on a global scale as such emissions contribute, on a cumulative basis, to global climate change. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies evaluate the cumulative impacts of GHGs, even relatively small additions, on a global basis. By their nature, GHG evaluations under CEQA are a cumulative study (see *Center for Biological Diversity v. California*

Department of Fish and Wildlife (2015) 62 Cal.4th 204.) The GHG emissions impact analysis contained in this section constitutes a cumulative analysis, in that it considers both global, statewide and regional projections of GHG emissions, as well as the contribution of the Update to the 2018 LRDP, to GHG emission impacts. Therefore, the significance conclusions for Issue 1 and Issue 2 also constitute this SEIR's significance conclusions with regard to cumulative GHG emissions impacts. The Update to the 2018 LRDP would not have a cumulatively considerable contribution to a significant cumulative GHG impact due to the generation of GHG emissions or inconsistency with applicable plans for the reduction of GHG emissions with the implementation of mitigation measures GHG-1A and GHG-1B.

3.6.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under GHG emissions are evaluated above. There are no CEQA issues where there is no potential for a significant effect related to GHG emissions.

3.6.6 REFERENCES

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3.7 NOISE

This section describes the noise environment of the UC San Diego campus and surrounding area and evaluates whether new or substantially more severe environmental impacts related to noise would result from the proposed Update to the 2018 LRDP compared to those identified in Section 3.10 of the 2018 LRDP EIR. Information in this section is based on the Supplemental Noise Analysis prepared by HELIX Environmental Planning, Inc. (HELIX 2024) for the proposed Update to the 2018 LRDP, which can be found in Appendix G of this SEIR. The Noise Technical Report prepared by AECOM for the 2018 LRDP EIR is incorporated by reference (AECOM 2018).

3.7.1 ENVIRONMENTAL SETTING

3.7.1.1 FUNDAMENTALS OF ENVIRONMENTAL NOISE

Section 3.10.1.1 of the 2018 LRDP EIR provides an overview of noise, including descriptors of noise levels, noise levels of typical sources, and background on the addition of noise sources, among other topics. The background provided in the 2018 LRDP EIR applies to the analysis provided herein and has not changed since certification of the 2018 LRDP EIR; however, a brief summary of noise level terms and concepts most relevant to this analysis is provided below as context for the following analysis of noise impacts.

Noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ}, with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours between 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours between 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. Sound levels expressed in CNEL are always based on dBA.

Because decibels are logarithmic units, they cannot be added or subtracted through standard arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than from one source under the same conditions. A 10 dBA increase in the level of continuous noise represents a perceived doubling of loudness. With respect to traffic noise, increases of 3 dBA are barely perceptible to people, while a 5 dBA increase is readily noticeable.

3.7.1.2 FUNDAMENTALS OF ENVIRONMENTAL VIBRATION

Section 3.10.1.2 of the 2018 LRDP EIR provides an overview of vibration units of measurement and typical responses for both humans and buildings. Similar to the discussion of noise fundamentals above, this information has not changed from the description provided in the 2018 LRDP EIR but a brief overview of key descriptors is provided here for reference.

Vibration is an oscillatory motion through a solid medium that can be described in terms of displacement, velocity, or acceleration. Typically, this is described as either the peak particle velocity (PPV) or root-mean-square (RMS) velocity in inches per second (in/sec). PPV is a measure of an instantaneous peak and, therefore, typically most appropriate for evaluating the potential for building damage. On the other hand, RMS velocity describes the average vibration amplitude and is

more appropriate for gauging human response to typical ground vibration. The RMS velocity is often expressed in dB notation as vibration dB (VdB). Groundborne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels.

3.7.1.3 EXISTING NOISE CONDITIONS

This SEIR is intended to provide a comparison of the Update to the 2018 LRDP to the baseline level, which is considered the 2018 LRDP. The existing conditions presented below are provided for context and informational purposes. The outdoor ambient sound environment within and surrounding the UC San Diego campus is similar to the conditions identified in the 2018 LRDP EIR, which were broadly characterized as an urban setting mixed with naturally occurring open spaces and varied terrain that provide conditions for a wide range of possible noise levels that are highly dependent on listener location. Specific changes in existing noise sources are described further below. As identified in the 2018 LRDP EIR, noise-sensitive land uses (NSLUs) are receptors associated with activities that may be subject to stress and/or significant interference from noise, and include the following types of development on and off campus:

- Campus housing or residential dwellings;
- Temporary lodging;
- Classrooms;
- Child development center;
- Libraries (and related learning spaces); and
- Inpatient medical care facility.

Existing Noise Sources

Following certification of the 2018 LRDP EIR, changes in the environmental setting include changes in the built environment both on- and off-campus. Mobile noise sources include both on- and off-campus vehicular traffic noise, which can vary depending on the volume, speed, vehicle types, and other physical conditions of a given roadway. The proximity to I-5, which bisects UC San Diego's La Jolla Campus, is a contributor to outdoor noise. Noise from roadway traffic is generally similar to the conditions identified in the 2018 LRDP EIR. The Mid-Coast Extension of the San Diego Trolley's UC San Diego Blue Line was completed in November 2021; noise related to the light rail vehicles, such as train pass-bys and train horns, are now audible within portions of East and West Campus. Although it was not complete before certification of the 2018 LRDP EIR, noise levels from the San Diego Trolley were anticipated and analyzed at that time.

Although the UC San Diego campus is not located within two miles of a public airport or public use airport, approved aircraft departure flight patterns from the nearby Marine Corps Air Station (MCAS) Miramar are located within one-half mile north of the campus. Based on the noise contour map prepared by MCAS Miramar, noise levels within campus resulting from MCAS Miramar aircraft traffic average less than 60 dBA CNEL on a daily basis, although individual flyovers may result in noise levels that exceed 60 dBA. The noise contours for this airport have been updated since the certification of the 2018 LRDP EIR but the campus remains outside of the 60 dBA CNEL noise contour (MCAS Miramar 2020). Similar to what was described in the 2018 LRDP EIR, medical

helicopter operations also continue to occur within UC San Diego, on the roof of the Jacobs Medical Center on East Campus. Medical helicopter operations also occur at the nearby Scripps Memorial Hospital, just north of East Campus.

As described in the 2018 LRDP EIR, UC San Diego contains numerous stationary noise sources not related to transportation, such as power plants, heating, ventilation, and air conditioning (HVAC) systems, and mechanically ventilated parking structures. While new stationary noise sources have been added or moved on campus as a result of development since certification of the 2018 LRDP EIR, no substantial change in the type of stationary noise sources has occurred. Due to the size of the campus and implementation of the 2018 LRDP, individual construction projects may also be occurring, which contribute to overall noise.

3.7.1.4 EXISTING VIBRATION CONDITIONS

Section 3.10.1.4 of the 2018 LRDP EIR identifies groundborne vibration occurring on and around campus resulting from vehicular and rail traffic, stationary noise sources, and construction activities. Construction activities continue to be temporary sources of vibration but generally produce higher magnitude vibrations than other sources. No substantial change in the sources of vibration generated on campus or in the surrounding area has occurred, though the locations of temporary construction continue to change.

3.7.2 REGULATORY FRAMEWORK

Section 3.10.2 of the 2018 LRDP EIR provides the regulatory framework related to noise applicable to development under the 2018 LRDP. As described therein, UC San Diego is not subject to local noise ordinances but is required to comply with Chapter 12, Section 1207, "Sound Transmission Control" of the CCR. The following regulatory framework focuses on new or updated regulations and guidance that have occurred since certification of the 2018 LRDP EIR.

3.7.2.1 FEDERAL

Federal Transit Administration

The Federal Transit Administration (FTA) guidance described in the 2018 LRDP EIR relied on a 2006 version of the FTA's Transit Noise and Vibration Impact Assessment Manual, which was updated in September 2018 (FTA 2018). However, the thresholds described in the 2018 LRDP EIR were not altered in the 2018 manual. As noted in the 2018 LRDP EIR, FTA thresholds vary with the existing outdoor sound level at the noise-sensitive receptor of concern. Generally, when the existing ambient sound level is relatively quiet, the allowable ambient increment due to noise contribution from a project is several dB whereas when the existing sound level is already loud, the allowable ambient increment can be modest or even zero.

3.7.2.2 STATE

California Assembly Bill 1307

AB 1307 was approved by Governor Newsom on September 7, 2023, after certification of the 2018 LRDP EIR. The bill adds Section 21085 to the PRC relating to environmental quality. PRC Section

21085 states that for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment under CEQA.

California Building Code

As was the case in the 2018 LRDP EIR, the UC has adopted the California Building Code (CBC) as its building code for campus development. The CBC is updated regularly with the most recent update being the 2022 version contained in CCR Title 24, Part 2. Requirements for sound transmission between adjacent dwelling or sleeping units, and between public areas and dwelling units or sleeping units have been moved to Part 2, Volume 1, Chapter 12, Section 1206 of the 2022 CBC (ICC 2022). However, the allowable interior noise level attributed to external sound sources remains 45 dB CNEL (or L_{DN}).

Section 1206.5 of the CBC directs the reader to the California Green Building Standards Code, Chapter 5, Division 5.5 for additional sound transmission requirements (as they relate to non-residential land uses). Consistent with the regulatory framework provided in the 2018 LRDP EIR, CCR Title 24, Part 11, Section 5.507 specifies building requirements for environmental comfort with regard to noise exposure for non-residential buildings. The requirements for interior acoustical control provided therein have not been altered from those described in the 2018 LRDP EIR, including wall and roof assemblies with sound transmission class (STC) ratings of at least 50 (or a composite outdoor-indoor transmission class [OITC] rating of not less than 40) and exterior windows rated with a minimum STC of 40 (or OITC of 30) when occupied structures are planned with a 65 dBA CNEL contour of an airport, railroad, highway traffic, or industrial noise source. The alternative performance method requires that the interior noise environment attributable to outdoor noise sources not exceed an hourly L_{EQ} of 50 dBA, as demonstrated by an acoustical analysis. For public schools and community colleges, Section 5.507.4 is applied only to new construction.

California Code of Regulations Section 65302(f)

CCR Section 65302 was amended by SB 932 in 2022; however, the revisions to Section 65302(f) were minor, consisting of revisions to text referencing other sections of this regulation, and the changes were not substantive and do not affect the analysis. In addition, it remains the case that a General Plan Noise Element is not required for UC campuses.

California Environmental Quality Act Guidelines

In 2019, the CEQA Guidelines were updated within the Noise section of Appendix G, which consolidated noise and vibration issues into three main questions. The question that required an analysis of the placement of new uses near existing noise sources (i.e., an analysis of the existing noise environment on the proposed project land uses), is no longer considered as a project impact under the revised Appendix G Guidelines.

3.7.2.3 LOCAL (NON-REGULATORY)

City of San Diego Noise-Land Use Compatibility Limits

As described above, the UC is constitutionally autonomous and hence exempt from municipal regulations. Nevertheless, City of San Diego standards are pertinent for establishing guidelines and

evaluating impacts from implementation of the Update to the 2018 LRDP as adjacent off-campus uses are located within the City of San Diego limits. UC San Diego has chosen to develop standards of significance, which are set forth in Table 3.7-1, *Noise Impact Significance Thresholds*, below, based, in part, on City of San Diego standards. City of San Diego Municipal Code Section 59.5.0404 sets a construction noise standard, which prohibits construction from 7 p.m. to 7 a.m. during weekdays and Saturdays except for extenuating circumstances, and anytime on Sundays or legal holidays. When construction activity is allowed, its noise shall not exceed 75 dBA L_{EQ} during the 12-hour period from 7 a.m. to 7 p.m. The 2018 LRDP EIR also provides guidance from Section 59.5.0401 of the City of San Diego Municipal Code, which restricts operational noise sources to nearby land uses, and the noise compatibility guidelines for traffic noise established in the City of San Diego General Plan Noise Element (City of San Diego 2008, as amended in 2015). These guidelines are reproduced in the 2018 LRDP EIR as Tables 3.10-6 and 3.10-7 and no change has occurred from the regulations described therein.

3.7.3 PROJECT IMPACTS AND MITIGATION

3.7.3.1 ISSUE 1 — EXCEED NOISE STANDARDS

Noise Issue 1 Summary

Would implementation of the Update to the 2018 LRDP result in generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Stationary Noise Source Screening Distances (Noi-1C), Stationary Noise Source Preliminary Assessment (Noi-1D), Stationary Noise Source Project-Specific Analysis (Noi-E), and Construction Noise Screening Distance (Noi-1F).

Summary of Analysis in the 2018 LRDP EIR

Vehicle Traffic and Rail Noise

The 2018 LRDP EIR identified impacts based on an assessment of whether transportation noise exceeded the criteria listed in Table 3.10-8 of the 2018 LRDP EIR. The analysis concluded that increased traffic volumes on local roadways would not result in substantial increases (3 dBA) in vehicular traffic noise. However, future NSLUs constructed under the 2018 LRDP could be exposed to excessive noise levels, resulting in potentially significant impacts. Similarly, the 2018 LRDP would not result in increased rail noise levels but could locate NSLUs where rail noise would exceed compatibility criteria.

Mitigation measures Noi-1A and Noi-1B require noise analyses for new on-campus NSLUs which may be exposed to elevated vehicle and rail noise levels, respectively. Implementation of the 2018 LRDP EIR's mitigation measures was determined to reduce vehicular noise impacts to less than significant levels.

Stationary Sources

The 2018 LRDP EIR identified impacts based on an assessment of whether stationary noise exceeded the criteria listed in Table 3.10-8 the 2018 LRDP EIR. The analysis concluded that new stationary noise sources would potentially expose NSLUs to excessive noise levels, resulting in potentially significant impacts.

Mitigation measure Noi-1C identified screening distances for new or modified stationary noise sources (i.e., electrical substations, parking structures, and major outdoor HVAC equipment). Noi-1D required project-specific preliminary noise assessments for noise sources proposed within the screening distances identified in Noi-1C. Noi-E required noise analyses if the preliminary noise assessment identified potential impacts. If the interior noise standards cannot be achieved through standard construction techniques, noise reduction measures shall be specified in the noise assessment and incorporated into the stationary noise source or NSLU to ensure compliance with the stated standards. With implementation of the 2018 LRDP EIR's mitigation measures, impacts were determined to be less than significant.

Construction Equipment Sources

The 2018 LRDP EIR identified impacts based on an assessment of whether construction noise exceeded the criteria listed in Table 3.10-8 of the 2018 LRDP EIR. The analysis concluded that construction activities would potentially expose NSLUs to excessive noise levels, resulting in potentially significant impacts.

Mitigation measure Noi-1F identified construction noise screening distance and noise reduction measures. Implementation of this mitigation measure was determined to reduce construction noise impacts to levels that are less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Vehicle trips generated under the Update to the 2018 LRDP would be increased in comparison to those analyzed in the 2018 LRDP EIR as shown in Table 3.7-2, *Year 2016 and Future (Year 2040) Traffic Volumes* below (LLG 2025); therefore, the focus of this subsequent noise analysis is vehicular traffic noise.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP is undertaken or new information of substantial importance.

Standards of Significance

In 2019, Appendix G of the state CEQA Guidelines was updated, which identified three questions related to noise and vibration that replaced the four questions in the previous version of the CEQA Guidelines. The questions were revised to combine construction and operational issues into a single question and to remove a question related to the environment's impact on a project. Issue 1 of this SEIR combines Issues 1, 3, and 4 from the 2018 LRDP EIR.

Implementation of the Update to the 2018 LRDP may have a significant impact if it would result in new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR, in terms of the generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, applicable standards of other agencies. As described above, UC San Diego is a constitutionally autonomous State entity and is exempt from municipal regulations; however, City of San Diego standards may be pertinent for establishing thresholds and evaluating impacts from campus development. As such, the 2018 LRDP EIR established standards of significance based, in part, on City of San Diego standards. These standards are provided in the 2018 LRDP EIR as Table 3.10-8, *Summary of Applicable Noise Impact Significance Criteria*. Table 3.7-1, simplifies the prior table for the Update to the 2018 LRDP by combining on- and off-campus land uses, and providing other minor clarifications. As a result of implementation of the Update to the 2018 LRDP, a significant impact would occur if transportation, stationary, or construction noise were to exceed the criteria listed in Table 3.7-1.

Table 3.7-1
Noise Impact Significance Thresholds

Noise Source	Land Uses	Significance Threshold
Transportation Noise Sources (vehicular traffic)	Campus Housing, Temporary Lodging, Inpatient Medical Care Facilities, Single-family Residences, Multi-family Residences, Hospitals, Day Care, Hotels, Motels, Parks, Convalescent Homes	65 dBA CNEL (exterior), or 3 dBA CNEL increase if existing noise level meets or exceeds 65 dBA CNEL 45 dBA CNEL (interior)*

Noise Source	Land Uses	Significance Threshold
	Classrooms, Child Development Center, Schools, Libraries	65 dBA CNEL (exterior) 50 dBA CNEL (interior)*
	Offices, Churches, Business, Professional Uses	70 dBA CNEL at exterior usable spaces or 3 dBA CNEL increase if existing noise level meets or exceeds 70 dBA CNEL; no interior space noise level criterion
	Commercial, Retail, Industrial, Outdoor Spectator Sports Uses	75 dBA CNEL at exterior usable spaces or 3 dBA CNEL increase if existing noise level meets or exceeds 75 dBA CNEL; no interior space noise level criterion
Stationary Noise Sources (e.g., HVAC equipment, electrical substations, ventilated parking structures)	Campus Housing, Temporary Lodging, Inpatient Medical Care Facilities	65 dBA CNEL (exterior), or 3 dBA CNEL increase if existing noise level meets or exceeds 65 dBA CNEL 45 dBA CNEL (interior)*
	Classrooms, Child Development Center, Libraries (and related Learning Spaces)	65 dBA CNEL (exterior), or 3 dBA CNEL increase if existing noise level meets or exceeds 65 dBA CNEL 50 dBA CNEL (interior)*
	Single-Family Residence	40 dBA L_{EQ} (nighttime) at residential property line or 65 dBA CNEL at residential property line
	Multi-Family Residential **	45 dBA L_{EQ} (nighttime) at residential property line
	All Other Residential**	50 dBA L_{EQ} (nighttime) at residential property line
Construction	Housing, Temporary Lodging, Inpatient Medical Care Facilities All Residentially-Zoned Properties	75 dBA L_{EQ} averaged over a 12-hour period between 7:00 a.m. and 7:00 p.m. Monday through Saturday (exterior)

Source: HELIX 2024

* Interior criteria only applicable to designated areas of land use where residences, inpatient beds, temporary lodging, and comparable project/building purposes are anticipated

** Consistent with the City of San Diego Noise Ordinance

Analysis of the Update to 2018 LRDP

Assumptions and Methodology

Vehicular Noise

Existing and future exterior noise levels along major roadways within and surrounding campus were modeled using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) Version 2.5. Updated existing and future traffic volumes based on the building space and population changes proposed by the Update to the 2018 LRDP were provided by LLG (2024). Traffic levels are presented in terms of ADT, which describes the average number of vehicles on a given roadway segment on a given day. A traffic distribution of 96 percent automobiles, 2 percent medium trucks, and 2 percent heavy trucks on local roads was used in this analysis, to replicate the assumptions used in the 2018 LRDP EIR. The Update to the 2018 LRDP SEIR does not propose uses which would cause changes to the traffic distribution. Table 3.7-2, *Year 2016 and Future (Year 2040) Traffic*

Volumes, summarizes the ADT data for nearby roadway's future conditions in 2040. This includes the 2018 LRDP Buildout ADT from the 2018 LRDP EIR and the future conditions from the Update to the 2018 LRDP, which are based on revised methodology for counting trips now being used by UC San Diego (LLG 2025). Although the future ADT is less than what was identified in the 2018 LRDP, this methodology provides a more accurate description of trip generation of campus land uses. In addition, the 2016 conditions from the 2018 LRDP EIR are provided for contextual purposes.

Table 3.7-2
Year 2016 and Future (Year 2040) Traffic Volumes

Roadway Segment	Year 2016 ADT[1]	Year 2040 ADT with 2018 LRDP Buildout[2]	Year 2040 ADT with Update to the 2018 LRDP[3]
Genesee Avenue			
North Torrey Pines Road to Science Center Drive	36,320	50,060	47,290
Science Center Drive to I-5 SB Ramps	40,170	62,790	60,020
I-5 NB Ramps to Scripps Hospital Drive	39,900	61,200	58,120
Scripps Hospital Drive to Campus Point Drive	33,720	67,510	64,430
Campus Point Dr to Regents Rd	34,260	65,600	60,300
North Torrey Pines Road			
Genessee Ave to Northpoint Driveway	21,940	25,630	22,690
Northpoint Driveway to Torrey Pines Scenic Drive	20,410	28,840	26,490
Torrey Pines Scenic Dr to Salk Institute Road	20,750	27,080	24,730
Salk Institute Rd to Pangea Dr	22,390	26,930	23,400
Pangea Dr to Muir College Dr	22,390	26,930	23,400
Muir College Dr to La Jolla Shores Dr	25,240	30,060	24,760
La Jolla Shores Dr to Expedition Wy	23,770	35,320	22,680
Expedition Wy to S Torrey Pines Rd	23,770	35,320	22,680
La Jolla Shores Drive			
Shellback Way to Downwind Way	10,670	13,420	12,990
Downwind Way to El Paseo Grande	10,670	13,420	12,990
Regents Road			
Genesee Avenue to Health Science Drive	5,680	11,870	9,240
Health Science Drive to Eastgate Mall	13,760	24,490	19,220
Eastgate Mall to Executive Drive	14,100	26,090	19,160
Executive Drive to Regents Park Row	15,640	24,510	17,440
Regents Park Row to La Jolla Village Drive	16,700	25,110	18,040
La Jolla Village Drive to Nobel Drive	16,470	21,460	18,650
South of Nobel Drive	10,920	12,000	11,570
La Jolla Village Drive			
Torrey Pines Road to La Jolla Scenic Drive	42,450	63,920	51,450
La Jolla Scenic Drive to Villa La Jolla Drive	44,790	63,690	51,380
Villa La Jolla Drive to I-5 SB Ramps	59,540	86,590	73,400
I-5 NB Ramps to Lebon Drive	52,360	57,710	49,020
Lebon Drive to Regents Road	40,290	58,710	50,610
Gilman Drive			
East of Villa La Jolla Drive	16,990	26,030	21,150
Villa La Jolla Drive to La Jolla Village Drive	15,470	22,620	24,140
Villa La Jolla Drive			
La Jolla Village Drive to Nobel Drive	17,620	28,020	20,660
Nobel Drive to Gilman Drive (South)	14,030	17,460	17,040

Roadway Segment	Year 2016 ADT[1]	Year 2040 ADT with 2018 LRDP Buildout[2]	Year 2040 ADT with Update to the 2018 LRDP[3]
Interstate 5			
Nobel Drive to La Jolla Village Drive	156,470	187,580	181,090
La Jolla Village Drive to Genesee Avenue	170,980	207,550	205,000

Source: LLG 2025

1 Existing ADT from 2016 conducted for the 2018 LRDP EIR.

2 Future conditions assume full buildout of the 2018 LRDP based on the 2018 LRDP EIR's calculations for 2035 plus a year-over-year incremental increase from the buildout year 2035 until 2040.

3 Future conditions with the Update to the 2018 LRDP assume full buildout of the Update based on revised methodology for counting trips generated by UC San Diego. This results in a more accurate, but lower, ADT than what was modeled in the 2018 LRDP EIR.

SB = southbound; NB = northbound

Noise levels were modeled for the following scenarios: 2016 conditions from the 2018 LRDP EIR and future conditions in 2040 with the 2018 LRDP Buildout and the total inclusive of the incremental increase from the Update to the 2018 LRDP. The roadway noise modeling represents a conservative analysis that does not consider topography or attenuation provided by existing structures. Similar to the methodology in the 2018 LRDP EIR, noise levels for off-site NSLUs were calculated at a standard distance of 50 feet from each roadway segment.

Peak-hour traffic volumes are estimated based on the assumption that approximately 10 percent of the average daily traffic would occur during a peak hour. The one-hour L_{EQ} noise level is calculated utilizing this peak-hour traffic. To analyze traffic noise against the standards of significance, hourly noise levels must be converted to the CNEL 24-hour average. The L_{EQ} can then be converted to CNEL using the following equation, where $L_{EQ}(h)pk$ is the peak hour L_{EQ}, P is the peak hour volume percentage of the ADT, d and e are divisions of the daytime fraction of ADT to account for daytime and evening hours, and N is the nighttime fraction of ADT:

$$CNEL = L_{EQ}(h)pk + 10\log10\ 4.17/P + 10\log10(d + 4.77e + 10N)$$

The model-calculated one-hour L_{EQ} noise output is therefore approximately equal to the CNEL (Caltrans 2013).

Rail Noise

Rail noise was analyzed in the 2018 LRDP EIR and no changes are expected to be directly generated by the Update to the 2018 LRDP. The Trolley may increase or decrease headways depending on ridership, but headways would be limited to the physical infrastructure of the rail lines and the Update to the 2018 LRDP would does not affect this infrastructure. Rail noise is not further analyzed in this SEIR.

Stationary Noise

Although stationary noise sources such as HVAC systems, electrical substations, events, and parking structures may be sited in new locations, changes in types of stationary sources are not proposed. The noise levels of these sources are therefore assumed to be similar to those analyzed under the 2018 LRDP EIR, as standard equipment technologies have not changed substantially in the intervening years. No additional modeling or analysis is proposed or assumed to be required.

Student Residents

Noise generated from residents of student housing are exempt from CEQA per AB 1307 and are not further analyzed in this SEIR.

Construction Equipment

As standard construction equipment technologies have not changed substantially in the intervening years, noise sources are assumed to be similar to those analyzed under the 2018 LRDP EIR. No additional modeling or analysis is proposed or assumed to be required.

Impact Analysis

Vehicle Traffic Noise

Using FHWA TNM 2.5, future roadway traffic noise was modeled for the set of roadway segments presented in Table 3.7-2. Input data was provided from the 2016 data used in the 2018 LRDP EIR, and updated data for 2040 provided by LLG. The 2040 scenario with the 2018 LRDP assumes full buildout of the 2018 LRDP with an incremental increase from the ambient growth between 2035 and 2040. The 2040 scenario with the Update to the 2018 LRDP is based on revised methodology which provides a lower, but more accurate, ADT calculation. The model provides the sound level at 50 feet from the roadway pavement edge, and at the approximate line-of-sight distance to noise contours at 60, 65, and 70 dBA CNEL.

Table 3.7-3, *2018 LRDP Future (2040) Roadway Traffic Noise Levels*, identifies the noise levels generated by nearby roadways in 2040 without implementation of the Update to the 2018 LRDP, based on the ADT identified in the 2018 LRDP EIR. Table 3.7-4, *Update to the 2018 LRDP Future (2040) Roadway Traffic Noise Levels*, identifies the noise levels with implementation of the Update to the 2018 LRDP using the updated methodology. Table 3.7-5, *Comparison of Year 2016 and Future Roadway Traffic Noise Levels*, compares the two scenarios and provides the change in noise due to the updated methodology and implementation of the Update to the 2018 LRDP.

As shown in Table 3.7-5, the change in vehicular traffic resulting from implementation of the Update to the 2018 LRDP and updated methodology would decrease future noise levels by varying levels at 50 feet from the nearest roadway pavement edge or curb line. A change of less than 3 dBA would generally not be considered perceptible by the average human ear. Because the roadway noise levels for all on- and off-campus roads would decrease compared to the analysis conducted in the 2018 LRDP EIR, the proposed Update to the 2018 LRDP would not generate increased traffic noise compared to what was analyzed previously in a manner that would cause a substantial permanent on- or off-campus increase in traffic-related ambient noise levels above levels existing without the project.

Although the noise levels have been updated due to new information, traffic attributable to the Update to the 2018 LRDP would not result in significant impacts to roadway traffic noise. This is the same conclusion that was made for the roadway traffic analysis for the 2018 LRDP detailed in Section 3.10 of the 2018 LRDP EIR. No significant vehicular traffic noise impacts to existing or future on-campus or off-campus NSLU receptors would occur as a result of the proposed Update to the 2018 LRDP.

Table 3.7-3
2018 LRDP Future (2040) Roadway Traffic Noise Levels

Roadway Segment	ADT	% MT	% HT	Speed Limit (mph)	CNEL at 50 feet (dBA)	Distance to 65 CNEL Noise Contour
Genesee Avenue						
North Torrey Pines Rd to Science Center Dr	50,060	2	2	45	74.5	135 feet
Science Center Dr to I-5 SB Ramps	62,790	2	2	45	75.5	155 feet
I-5 NB Ramps to Scripps Hospital Dr	61,200	2	2	45	75.4	150 feet
Scripps Hospital Dr to Campus Point Dr	67,510	2	2	45	75.8	160 feet
Campus Point Dr to Regents Rd	65,600	2	2	45	75.7	155 feet
North Torrey Pines Road						
Genessee Ave to Northpoint Driveway	25,630	2	2	45	71.6	100 feet
Northpoint Driveway to Torrey Pines Scenic Dr	28,840	2	2	45	72.2	105 feet
Torrey Pines Scenic Dr to Salk Institute Rd	27,080	2	2	45	71.9	100 feet
Salk Institute Rd to Pangea Dr	26,930	2	2	45	71.9	100 feet
Pangea Dr to Muir College Dr	26,930	2	2	45	71.9	100 feet
Muir College Dr to La Jolla Shores Dr	30,060	2	2	45	72.3	105 feet
La Jolla Shores Dr to Expedition Wy	35,320	2	2	45	73.0	115 feet
Expedition Wy to S Torrey Pines Rd	35,320	2	2	45	73.0	115 feet
La Jolla Shores Drive						
Shellback Way to Downwind Way	13,420	2	2	30	64.4	45 feet
Downwind Way to El Paseo Grande	13,420	2	2	30	64.4	45 feet
Regents Road						
Genesee Avenue to Health Science Drive	11,870	2	2	25	63.1	30 feet
Health Science Drive to Eastgate Mall	24,490	2	2	25	66.2	65 feet
Eastgate Mall to Executive Drive	26,090	2	2	40	70.7	145 feet
Executive Drive to Regents Park Row	24,510	2	2	40	70.5	140 feet
Regents Park Row to La Jolla Village Drive	25,110	2	2	40	70.6	140 feet
La Jolla Village Drive to Nobel Drive	21,460	2	2	40	70.0	125 feet
South of Nobel Drive	12,000	2	2	40	67.4	80 feet
La Jolla Village Drive						
Torrey Pines Road to La Jolla Scenic Drive	63,920	2	2	45	75.6	165 feet
La Jolla Scenic Drive to Villa La Jolla Drive	63,690	2	2	45	75.6	165 feet
Villa La Jolla Drive to I-5 SB Ramps	86,590	2	2	45	77.4	420 feet
I-5 NB Ramps to Lebon Drive	57,710	2	2	45	75.6	330 feet
Lebon Drive to Regents Road	58,710	2	2	45	75.7	330 feet
Gilman Drive						
East of Villa La Jolla Drive	26,030	2	2	25	66.5	70 feet
Villa La Jolla Drive to La Jolla Village Drive	22,620	2	2	25	65.9	60 feet
Villa La Jolla Drive						
La Jolla Village Drive to Nobel Drive	28,020	2	2	25	64.8	70 feet
Nobel Drive to Gilman Drive (South)	17,460	2	2	25	64.8	50 feet
Interstate 5						
Nobel Drive to La Jolla Village Drive	187,580	2.32	1.78	65	85.2	400 feet
La Jolla Village Drive to Genesee Avenue	207,550	2.32	1.78	65	85.6	420 feet

[1] Future noise levels assume full buildout of the 2018 LRDP, without the Update.
ADT = average daily traffic; MT = medium truck; HT = heavy truck; mph = miles per hour; CNEL = community equivalent noise level; dBA = A-weighted decibel; SB = southbound; NB = northbound

Table 3.7-4
Update to the 2018 LRDP Future (2040) Roadway Traffic Noise Levels[1]

Roadway Segment	ADT	% MT	% HT	Speed Limit (mph)	CNEL at 50 feet (dBA)	Distance to 65 CNEL Noise Contour
Genesee Avenue						
North Torrey Pines Rd to Science Center Dr	47,290	2	2	45	74.3	135 feet
Science Center Dr to I-5 SB Ramps	60,020	2	2	45	75.3	150 feet
I-5 NB Ramps to Scripps Hospital Dr	58,120	2	2	45	75.2	150 feet
Scripps Hospital Dr to Campus Point Dr	64,430	2	2	45	75.6	155 feet
Campus Point Dr to Regents Rd	60,300	2	2	45	75.4	150 feet
North Torrey Pines Road						
Genessee Ave to Northpoint Driveway	22,690	2	2	45	71.1	95 feet
Northpoint Driveway to Torrey Pines Scenic Dr	26,490	2	2	45	71.8	100 feet
Torrey Pines Scenic Dr to Salk Institute Rd	24,730	2	2	45	71.5	100 feet
Salk Institute Rd to Pangea Dr	23,400	2	2	45	71.3	95 feet
Pangea Dr to Muir College Dr	23,400	2	2	45	71.3	95 feet
Muir College Dr to La Jolla Shores Dr	24,760	2	2	45	71.5	100 feet
La Jolla Shores Dr to Expedition Wy	22,680	2	2	45	71.1	95 feet
Expedition Wy to S Torrey Pines Rd	22,680	2	2	45	71.1	95 feet
La Jolla Shores Drive						
Shellback Way to Downwind Way	12,990	2	2	30	64.2	45 feet
Downwind Way to El Paseo Grande	12,990	2	2	30	64.2	45 feet
Regents Road						
Genesee Avenue to Health Science Drive	9,240	2	2	25	61.9	25 feet
Health Science Drive to Eastgate Mall	19,220	2	2	25	65.2	50 feet
Eastgate Mall to Executive Drive	19,160	2	2	40	69.4	115 feet
Executive Drive to Regents Park Row	17,440	2	2	40	69.1	105 feet
Regents Park Row to La Jolla Village Drive	18,040	2	2	40	69.2	125 feet
La Jolla Village Drive to Nobel Drive	18,650	2	2	40	69.3	115 feet
South of Nobel Drive	11,570	2	2	40	67.3	75 feet
La Jolla Village Drive						
Torrey Pines Road to La Jolla Scenic Drive	51,450	2	2	45	74.7	150 feet
La Jolla Scenic Drive to Villa La Jolla Drive	51,380	2	2	45	74.7	150 feet
Villa La Jolla Drive to I-5 SB Ramps	73,400	2	2	45	76.7	380 feet
I-5 NB Ramps to Lebon Drive	49,020	2	2	45	75.1	300 feet
Lebon Drive to Regents Road	50,610	2	2	45	75.1	300 feet
Gilman Drive						
East of Villa La Jolla Drive	21,150	2	2	25	65.6	55 feet
Villa La Jolla Drive to La Jolla Village Drive	24,140	2	2	25	64.5	45 feet
Villa La Jolla Drive						
La Jolla Village Drive to Nobel Drive	20,660	2	2	25	65.5	55 feet
Nobel Drive to Gilman Drive (South)	17,040	2	2	25	64.7	55 feet
Interstate 5						
Nobel Drive to La Jolla Village Drive	181,090	2.32	1.78	65	85.0	400 feet
La Jolla Village Drive to Genesee Avenue	205,000	2.32	1.78	65	85.5	420 feet

[1] Future noise levels assume full buildout of the 2018 LRDP plus the incremental increase from the Update to the LRDP.
ADT = average daily traffic; MT = medium truck; HT = heavy truck; mph = miles per hour; CNEL = community equivalent noise level; dBA = A-weighted decibel; SB = southbound; NB = northbound

Table 3.7-5
Comparison of Year 2016 and Future Roadway Traffic Noise Levels

Roadway Segment	Year 2016 CNEL (dBA)	Year 2040 with 2018 LRDP Buildout[1] CNEL (dBA)	Year 2040 with Update to the 2018 LRDP Buildout[2] CNEL (dBA)	Change in CNEL from Year 2016 to Year 2040 with 2018 LRDP Buildout (dBA)	Change in CNEL from Year 2040 with 2018 LRDP Buildout to Year 2040 with Update to 2018 LRDP Buildout (dBA)[2]
Genesee Avenue					
North Torrey Pines Rd to Science Center Dr	73.2	74.5	74.3	1.3	-0.2
Science Center Dr to I-5 SB Ramps	73.6	75.5	75.3	1.9	-0.2
I-5 NB Ramps to Scripps Hospital Dr	73.6	75.4	75.2	1.8	-0.2
Scripps Hospital Dr to Campus Point Dr	72.9	75.8	75.6	2.9	-0.2
Campus Point Dr to Regents Rd	73.0	75.7	75.4	2.7	-0.3
North Torrey Pines Road					
Genessee Ave to Northpoint Driveway	71.0	71.6	71.1	0.6	-0.5
Northpoint Driveway to Torrey Pines Scenic Dr	70.7	72.2	71.8	1.5	-0.4
Torrey Pines Scenic Dr to Salk Institute Rd	70.8	71.9	71.5	1.1	-0.4
Salk Institute Rd to Pangea Dr	71.1	71.9	71.3	0.8	-0.6
Pangea Dr to Muir College Dr	71.1	71.9	71.3	0.8	-0.6
Muir College Dr to La Jolla Shores Dr	71.6	72.3	71.5	0.7	-0.8
La Jolla Shores Dr to Expedition Wy	71.4	73.0	71.1	1.6	-1.9
Expedition Wy to S Torrey Pines Rd	71.4	73.0	71.1	1.6	-1.9
La Jolla Shores Drive					
Shellback Way to Downwind Way	63.4	64.4	64.2	1.0	-0.2
Downwind Way to El Paseo Grande	63.4	64.4	64.2	1.0	-0.2
Regents Road					
Genesee Avenue to Health Science Drive	59.9	63.1	61.9	3.2	-1.2
Health Science Drive to Eastgate Mall	63.8	66.2	65.2	2.4	-1.0
Eastgate Mall to Executive Drive	68.2	70.7	69.4	2.5	-1.3
Executive Drive to Regents Park Row	68.6	70.5	69.1	1.9	-1.4
Regents Park Row to La Jolla Village Drive	68.9	70.6	69.2	1.7	-1.4

Roadway Segment	Year 2016 CNEL (dBA)	Year 2040 with 2018 LRDP Buildout[1] CNEL (dBA)	Year 2040 with Update to the 2018 LRDP Buildout[2] CNEL (dBA)	Change in CNEL from Year 2016 to Year 2040 with 2018 LRDP Buildout (dBA)	Change in CNEL from Year 2040 with 2018 LRDP Buildout to Year 2040 with Update to 2018 LRDP Buildout (dBA)[2]
La Jolla Village Drive to Nobel Drive	68.8	70.0	69.3	1.2	-0.7
South of Nobel Drive	67.1	67.4	67.3	0.3	-0.1
La Jolla Village Drive					
Torrey Pines Road to La Jolla Scenic Drive	73.9	75.6	74.7	1.7	-0.9
La Jolla Scenic Drive to Villa La Jolla Drive	74.1	75.6	74.7	1.5	-0.9
Villa La Jolla Drive to I-5 SB Ramps	75.8	77.4	76.7	1.6	-0.7
I-5 NB Ramps to Lebon Drive	75.3	75.6	74.9	0.3	-0.7
Lebon Drive to Regents Road	74.1	75.7	75.1	1.6	-0.6
Gilman Drive					
East of Villa La Jolla Drive	64.7	66.5	65.6	1.8	-0.9
Villa La Jolla Drive to La Jolla Village Drive	64.3	65.9	64.5	1.6	-1.4
Villa La Jolla Drive					
La Jolla Village Drive to Nobel Drive	64.8	64.8	65.5	0.0	-1.3
Nobel Drive to Gilman Drive (South)	63.9	64.8	64.7	0.9	-0.1
Interstate 5					
Nobel Drive to La Jolla Village Drive	84.8	85.2	85.0	0.4	-0.2
La Jolla Village Drive to Genesee Avenue	85.2	85.6	85.5	0.4	-0.1

[1] Future conditions assume full buildout of the 2018 LRDP plus the incremental increase from ambient growth from 2035 to 2040.

[2] Future conditions with the Update to the 2018 LRDP assume full buildout of the Update based on revised methodology for counting trips generated by UC San Diego. This results in a lower, but more accurate, ADT than what was modeled in the 2018 LRDP EIR.

ADT = average daily traffic; MT = medium truck; HT = heavy truck; mph = miles per hour; CNEL = community equivalent noise level; dBA = A-weighted decibel; SB = southbound; NB = northbound

Stationary Sources

As discussed above, noise related to stationary sources would remain similar to what was described in the 2018 LRDP EIR. The Update to the 2018 LRDP SEIR proposes stationary noise sources similar to what was identified in the 2018 LRDP EIR. All future stationary noise sources would continue to be required to adhere to the noise impact significance thresholds outlined in Table 3.7-1. Similar to the conclusions of the 2018 LRDP EIR, new stationary noise sources would potentially expose NSLUs to excessive noise levels, resulting in potentially significant impacts.

Construction Equipment Sources

Additional construction activities would occur from implementation of the Update to the 2018 LRDP. While the location and timing of construction projects may be different from what was proposed under the 2018 LRDP, the noise sources and equipment types would be similar. Nighttime construction may be required for specific extenuating circumstances, such as infrequent instances to accommodate concrete pours, to reduce conflicts with traffic or operation of nearby uses, and other case-by-case scenarios. These scenarios, if required, would adhere to the nighttime standards found in Table 3.7-1 to ensure noise levels do not exceed 40 or 45 dBA L_{EQ} at nearby off-site single-family or multi-family residences, respectively. Noise impacts related to construction would remain similar to what was described in the 2018 LRDP EIR; construction activities would potentially expose NSLUs to excessive noise levels.

Level of Significance Before Mitigation

Similar to the conclusions identified in Section 3.10.3.1 of the 2018 LRDP EIR, vehicular traffic noise impacts would be less than significant. As shown in Table 3.7-5, the decrease in vehicular traffic resulting from implementation of the Update to the 2018 LRDP would not increase future noise levels by more than 3 dBA CNEL where the existing noise level exceeds the applicable land use compatibility threshold. An increase of 3 dBA CNEL would generally not be considered perceptible by the average human ear. As described above, this decrease in traffic is based on revised methodology for assessing trip generation, which is a more accurate method for counting trip generation based on travel behaviors associated with a university context.

The Update to the 2018 LRDP would lead to additional construction and stationary sources on campus, but these sources would be largely similar to those described in the 2018 LRDP EIR. Similar to the conclusions identified in the 2018 LRDP EIR, potentially significant impacts related to stationary sources and construction would occur.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Due to the change in significance standards in Appendix G of the state CEQA Guidelines, the potential effects of an existing environment's noise levels on a project are no longer considered a noise impact. The compatibility of a proposed NSLU with noise levels in a specific location is addressed through compliance with planning guidelines such as the CBC referenced in the Regulatory Framework section above. Therefore 2018 LRDP EIR mitigation measures Noi-1A and Noi-1B from the 2018 LRDP EIR are no longer required.

Revised mitigation measures for the Update to the 2018 LRDP:

Revisions to the 2018 LRDP EIR's mitigation measures account for the revised CEQA Appendix G Guidelines, updated table references, and clarification of requirements. This includes clarifying text for nighttime construction. Changes have been tracked below with strikeout and underlined text denoting text removals and additions, respectively, as compared to the mitigation measure language found in the 2018 LRDP EIR.

Noi-1C **Stationary Noise Source Screening Distances.** If new or modified stationary noise sources (including major HVAC systems, electrical substations, ventilated parking structures, or similar facilities with noise-producing operating mechanical equipment) are proposed in the vicinity of NSLUs (existing and future) ~~or NSLUs are proposed in the vicinity of existing stationary sources~~, the project shall incorporate the following screening distances between the NSLU and the stationary noise source to avoid potential noise impacts:

i. Constructing new ventilated electrical substations at least 500 feet from existing or proposed NSLUs

ii. Constructing new ventilated parking structures at least 250 feet from existing or proposed NSLUs

iii. Positioning new and renovated major outdoor HVAC equipment, not shielded by a noise-reducing barrier or other means, at least 100 feet from existing or proposed NSLUs.

Should the NSLU already be exposed to noise in excess of stated thresholds in Table ~~3.10-8~~3.7-1, then the new or renovated stationary noise source(s) shall be evaluated in a preliminary noise assessment as noted in Noi-1D.

Noi-1D **Stationary Noise Source Preliminary Assessment.** If the screening distances noted in Noi-1C cannot be achieved, a preliminary noise assessment shall be conducted by a qualified acoustician to determine if there would be the potential for exterior noise impacts to NSLUs using ~~the sample analysis techniques contained in this report or comparably equivalent~~ methods for assessing the potential for exceeding the noise criteria outlined in Table ~~3.10-8~~3.7-1. If the preliminary noise assessment predicts the potential for impacts, a project-specific noise analysis shall be conducted in accordance with Noi-1E:

Noi-1E **Stationary Noise Source Project-Specific Analysis.** If the potential for noise impacts is determined in accordance with Noi-1D, a project-specific noise analysis shall be conducted by a qualified acoustician to determine if the future stationary source would expose NSLU(s) to noise in excess of 65 dBA CNEL at the building façade.

i. The analysis shall ~~also~~ demonstrate that the sound level in all habitable rooms will be 45 dBA CNEL or less and/or that the interior noise level within classrooms shall also not exceed 50 dBA CNEL.

ii. If the stated interior noise standards cannot be achieved through standard construction techniques, noise reduction measures shall be specified in the detailed noise analysis and incorporated into the stationary noise source or NSLU to ensure compliance with the stated standards.

Noi-1F **Construction Noise Screening Distance.** If project construction activities resulting from implementation of the Update to the 2018 LRDP are proposed within less than 150 feet of an NSLU, or may involve the use of vibratory or impact-type pile drivers, impact-type equipment (including, but not limited to, clam shovels, hydra break rams, hoe rams, and jackhammers), concrete saws, pavement scarifiers, sand blasters, or vibrating

hoppers, mitigation shall be integrated into the project's construction specifications to minimize temporary noise caused by construction activities to less than significant levels:

i. Require the construction contractor to work with proper administrative controls on equipment operation periods so as not to exceed a 12-hour average sound level of 75 dBA L_{EQ} at any NSLU between 7:00 a.m. and 7:00 p.m. Monday through Saturday, except for infrequent, extenuating circumstances when nighttime work is required for short periods of time, such as to accommodate concrete pours, to reduce conflicts with traffic or operation of nearby uses, and other case-by-case scenarios. These activities shall be approved by UC San Diego Campus Planning and other applicable campus departments prior to occurrence.

ii. Outfit construction equipment with properly maintained, manufacturer-approved or recommended sound abatement means on air intakes, combustion exhausts, heat dissipation vents, and the interior surfaces of engine hoods and power train enclosures.

iii. Locate (to the extent practical) steady-state, continuously operating stationary construction equipment such as generators, pumps, and air compressors at least 150 feet from nearby NSLUs. If this screening distance cannot be achieved in the field, additional attenuation would be required. This may include deployment of temporary noise walls or acoustical blankets/curtains that would block direct sound paths between the operating equipment and the receptor(s) of concern.

iv. Position (to the extent practical) construction laydown and vehicle staging areas as far from NSLUs as feasible.

v. Inform, whenever possible and preferably with at least a two-week advanced notice, all neighboring NSLUs expected to be exposed to elevated noise levels that a construction project would commence.

vi. Where NSLUs are expected to be less than 100 feet away, schedule anticipated loud construction activities, which could involve impact-type equipment and processes such as pile driving, jackhammering, pavement breaking, compactors, etc., to not coincide with any final exams week and recognized holidays. Adjust hours or days of the construction activity to occur before or after these noise-sensitive periods of the UC San Diego academic year.

New mitigation measures for the Update to the 2018 LRDP:

Because no additional impacts were identified following implementation of the Update to the 2018 LRDP as compared to the 2018 LRDP, no additional mitigation measures are required.

Level of Significance After Mitigation

Implementation of mitigation measures Noi-1C through Noi-1F would reduce impacts to a level that is less than significant, consistent with the conclusion of the 2018 LRDP EIR.

3.7.3.2 ISSUE 2 — EXCESSIVE GROUNDBORNE VIBRATION OR NOISE

Noise Issue 2 Summary

Would implementation of the Update to the 2018 LRDP result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Construction vibration screening distance (Noi-2B).

Summary of Analysis in the 2018 LRDP EIR

Summary of 2018 LRDP EIR

The 2018 LRDP EIR identified impacts based on an assessment of whether groundborne vibration or noise exceeded the criteria listed in Tables 3.10-3, 3.10-4, and 3.10-5 of the 2018 LRDP EIR. The analysis concluded that vibration-sensitive receptors' proximity to the San Diego Trolley and construction equipment would result in a potentially significant impact depending on the type and vibration sensitivity of the receiver.

Mitigation measure Noi-2A requires vibration analyses for new vibration-sensitive receptors within the applicable screening distance of the Trolley per Table 3.10-16 of the 2018 LRDP EIR. Mitigation measure Noi-2B requires implementation of a construction vibration mitigation program to reduce vibration resulting from construction activities to the maximum extent practicable. Implementation of the 2018 LRDP EIR's mitigation measures were determined to reduce vibration impacts to less than significant levels.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

There are no changes due to implementation of the Update to the 2018 LRDP that would require major revisions to the 2018 LRDP EIR.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP is undertaken or new information of substantial importance.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels, or if the Update presents new or substantially more significant impacts than those identified in the 2018 LRDP EIR.

As listed in Table 3.7-6, *Caltrans Guidance on Maximum Vibration Levels for Construction Equipment*, the Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans 2013) provides guidance for the analysis of vibratory impacts generated by transportation and construction projects by providing thresholds for structural damage risk. Table 3.7-7, *Federal Transit Administration Construction Vibration Criteria*, presents similar guidance from the FTA (2018), which offers vibration criteria comparable to that of Caltrans for continuous or steady sources of vibration but suggests a more stringent threshold for historic buildings.

Table 3.7-6
Caltrans Guidance on Maximum Vibration Levels for Construction Equipment

Building Category	Potential Damage Thresholds (PPV)	
	Transient* Sources (in/s)	Continuous/Frequent** Intermittent Sources (in/s)
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial and commercial buildings	2.0	0.5

Source: Caltrans 2013.
Notes:
* Transient sources generate a single vibratory event, such as blasting.
** Continuous/frequent sources include pile driving equipment and other construction activities generating multiple vibration-intensive events across a given period.
in/s = inches per second; PPV = peak particle velocity.

Table 3.7-7
Federal Transit Administration Construction Vibration Criteria

Building Category	Thresholds	
	PPV (in/s)	Approximate L_v (VdB)*
I. Reinforced concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: FTA 2018.
Notes:
* RMS velocity in decibels (VdB) referenced to 1 micro-inch per second.
in/s = inches per second; PPV = peak particle velocity.

With respect to human annoyance, FTA guidance sets a threshold of 80 VdB for residential land uses and other buildings where people normally sleep (FTA 2018). This standard applies to campus housing, temporary lodging, and inpatient medical care facilities. For classrooms, libraries (and related learning spaces), and child development centers that would be considered "institutional land uses" per FTA guidance that feature primarily daytime and evening use, a less stringent 83 VdB would apply.

A third category of vibration sensitivity relates to the potential for disruption of laboratory research, medical procedures, or commercial processes and activities. Table 3.7-8, *Interpretation of Vibration Criteria for Detailed Analysis*, presents FTA guidance with respect to activity vibration sensitivity levels for a variety of land uses and receptor types. This guidance provides VdB thresholds for disruption sensitivity based on the type of equipment at issue.

Table 3.7-8
Interpretation of Vibration Criteria for Detailed Analysis

Space Usage or Vibration Criterion (VC)	Maximum Level (VdB)[1]	Description of Use or Receptor
Computer equipment	78	Adequate for computer equipment and low- power optical microscopes (up to 20X).
Operating rooms	72	Suitable for medium-power optical microscopes (100X) and other equipment of low sensitivity.
VC-A	66	Adequate for medium- to high-power optical microscopes (400X), microbalances, optical balances, and similar specialized equipment.
VC-B	60	Adequate for high-power optical microscopes (1000X), inspection and lithography equipment to 3 micron line widths.
VC-C	54	Appropriate for most lithography and inspection equipment to 1 micron detail size.
VC-D	48	Suitable in most instances for the most demanding equipment, including electron microscopes operating to the limits of their capability.
VC-E	42	The most demanding criterion for extremely vibration-sensitive equipment.

Source: FTA 2018.
1 As measured in 1/3-octave bands of frequency over the frequency range 8 to 80 hertz.
VC = vibration criterion

Construction activities would also have the potential to generate levels of groundborne vibration that could adversely affect nearby sensitive land uses, buildings that are structurally sensitive to groundborne vibration, and facilities where equipment and/or activities may be sensitive to vibratory influences. The level of vibration experienced by these land uses would depend both on the vibrational energy-generating capability of the construction equipment or process, and the type of surface soils and strata through which the vibration transmits from the source to the receiver. By way of examples, Table 3.7-9 identifies screening distances for two construction activity samples: (1) a vibratory roller, which likely represents the largest source of typical construction site vibration magnitude without using impact or vibratory-type pile driving equipment, and (2) an impact-type pile driver.

Table 3.7-9
Screening Distances per Vibration-Sensitive Receptor Type and Vibration Source

Receptor Type	VdB Threshold	Distance from Vibration Source (feet)	
		Construction (vibratory roller[1])	Construction (impact pile driver[2])
FTA type IV – Buildings extremely susceptible to vibration damage	90	35	75
Classrooms, libraries (and related learning spaces), and child development centers	83	60	125
Campus housing, temporary lodging, inpatient medical care facilities	80	75	155
Computer equipment rooms	78	85	185
Operating rooms	72	135	300
VC-A	66	215	450

[1] per FTA (2006), with reference 94 VdB at 25 feet
[2] typical per FTA (2006), with reference 104 VdB at 25 feet
VC = vibration criterion

Analysis of the Update to 2018 LRDP

Assumptions and Methodology

Rail vibration is not expected to be generated by the Update to the 2018 LRDP. Vibration from the Trolley may increase or decrease depending on the frequency of headways, but vibration from individual train pass-bys would not increase compared to the analysis presented in the 2018 LRDP. Rail vibration is not further analyzed in this SEIR. Furthermore, the Trolley's tracks within the vicinity of campus are elevated on aboveground guideways, which results in reduced groundborne vibration as compared to at-grade rail.

Operational vibration levels from vehicular traffic would not be expected to generate substantial levels of vibration or groundborne noise. Operating vehicles have inflated tires and vibration-dampening suspension systems to help minimize roadway roughness and engine operation vibration transmission to the roadway surface. Operational vibration from vehicular traffic would not increase compared to the analysis presented in the 2018 LRDP and is not further analyzed in this SEIR.

Stationary sources, typified by HVAC and other electromechanical systems, would also not be expected to generate substantial levels of vibration or groundborne noise and are not further

analyzed in this SEIR. Such equipment is typically designed, manufactured, and operated with reciprocating or rotational moving parts that are well balanced and create negligible vibration. The Update to the 2018 LRDP does not propose additional stationary sources that would produce substantial vibration above what was analyzed in the 2018 LRDP EIR.

Because individual buildings and development projects under the Update to the 2018 LRDP would not differ greatly from those analyzed in the 2018 LRDP EIR, construction vibration would be generated by equipment similar to those previously identified and analyzed. As anticipated in the 2018 LRDP EIR, the use of pile driving equipment and a vibratory roller continue to represent the largest sources of construction vibration that would be required for implementation of the Update to the 2018 LRDP.

Impact Analysis

As described in the 2018 LRDP EIR, construction activities would have the potential to generate levels of groundborne vibration that could adversely affect nearby NSLU's, buildings that are structurally sensitive to groundborne vibration, and facilities where equipment and/or activities may be sensitive to vibratory influences. With implementation of the Update to the 2018 LRDP, construction activity is expected to increase, but sources of construction vibration would remain consistent with what was described in the 2018 LRDP EIR.

The level of vibration experienced by land uses would depend both on the vibrational energy-generating capability of the construction equipment or process, and the type of surface soils and strata through which the vibration transmit from the source to the receiver. Vibration-sensitive land uses in the vicinity include residences, laboratories, and medical facilities that use vibration-sensitive equipment. Consistent with the analysis in the 2018 LRDP EIR, construction activities could generate vibration during construction that would expose vibration-sensitive land uses to excessive vibration. These activities would be similar to construction techniques anticipated in the 2018 LRDP EIR. Vibration would not be greater than what was previously analyzed.

Level of Significance Before Mitigation

Similar to the conclusions identified in Section 3.10.3.2 of the 2018 LRDP EIR, impacts would be potentially significant.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Due to the change in significance standards in Appendix G of the state CEQA Guidelines, the potential effects of an existing environment's vibration levels are no longer considered an impact. The compatibility of a proposed vibration-sensitive land use with noise levels in a specific location is addressed through compliance with planning guidelines. Therefore, mitigation measure Noi-2A from the 2018 LRDP EIR is no longer required.

Revised mitigation measure for the Update to the 2018 LRDP:

Edits to the following mitigation measure from the 2018 LRDP EIR have been made below to reflect updated table references (as indicated in strikeout/underlined text).

Noi-2B **Construction Vibration Screening Distance.** Prior to the commencement of construction of projects that would involve heavy earth-moving equipment or impact-type pile driving within the applicable screening distance per Table ~~3.10-16~~3.7-9, or if the existing receptor involves activities that are vibration sensitive at a level more stringent than VC-A as appearing in Table ~~3.10-15~~3.7-8, UC San Diego shall retain a qualified acoustician to prepare a construction vibration mitigation program to be implemented by the construction contractor(s). The construction vibration mitigation program shall identify and require measures to reduce vibration resulting from construction activities to the maximum extent practicable, as well as detail construction activity notification and monitoring processes that include, but are not limited to, the following:

i. Vibration monitoring shall be performed during construction to establish the level of vibration produced by high impact activities. Monitoring shall be conducted when any construction activity would occur within the above-described screening distances noted in Table ~~3.10-16~~3.7-9. Monitoring shall be conducted using portable vibration-monitoring instrumentation that provides a calibrated record of local ground movement/accelerations. If construction vibration exceeds the appropriate threshold, work should be stopped and resumed when alternative work methods and equipment can be implemented. Baseline vibration levels at specified locations shall be established prior to the construction activity.

ii. Building occupants of vibration-sensitive land uses within the applicable screening distance per Table ~~3.10-16~~3.7-9 shall be notified at least two weeks prior to the start of construction.

New mitigation measures for the Update to the 2018 LRDP:

Because no additional vibration impacts were identified following implementation of the Update to the 2018 LRDP as compared to the 2018 LRDP, no additional mitigation is required.

Level of Significance After Mitigation

Implementation of mitigation measure Noi-2B would reduce impacts to a level that is less than significant, consistent with the conclusion of the 2018 LRDP EIR related to vibration.

3.7.4 CUMULATIVE IMPACTS AND MITIGATION

Noise Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative noise impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Exceed Noise Standards.	Potentially significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with Noi-1C through Noi-1F.
Excessive groundborne vibration or noise.	Potentially significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with Noi-2B.

The geographic context for the analysis of cumulative noise impacts varies based on the type of noise impact being analyzed. For construction-related and operational stationary source noise impacts, only the area in the vicinity of an individual project site associated with implementation of the Update to the 2018 LRDP could contribute to the cumulative impacts, as noise impacts are typically localized. For example, construction noise dissipates/attenuates quickly with increased distance between the construction site and the receptor, and intervening structures provide noise reduction. For an operational mobile-source (i.e., roadway), the geographic context for cumulative noise impacts is the immediate area surrounding the roadways that would be affected by implementation of the Update to the 2018 LRDP, as well as cumulative development (e.g., as forecasted by the traffic analysis reflecting regional growth). For groundborne vibration, the geographic context for cumulative groundborne vibration impacts is generally limited to buildings and structures located close to the construction or operation activity.

Substantial Temporary or Permanent Increase in Noise Levels That Exceed Noise Standards

The 2018 LRDP EIR concluded that construction and non-traffic operational noise levels from cumulative projects would largely be localized within their immediate vicinities and that compliance with noise regulations would reduce noise levels. Traffic-related noise was considered in the context of impacts to future NSLUs. Mitigation to address non-traffic operational noise was identified, which included Noi-1A, through Noi-1E. Mitigation measure Noi-1F addressed construction noise. These measures were identified to reduce impacts to a less than significant level. The 2018 LRDP EIR concluded traffic-related noise impacts would not be cumulatively considerable.

Depending on their distances to a common receiving NSLU, activity concurrency, and intensity of construction equipment and processes, construction activities from one or more of the on-campus cumulative projects listed in Table 3-1 may generate noise in conjunction with implementation of the Update to the 2018 LRDP. Projects near the boundary of campus would be the most likely to have construction noise in the vicinity of off-site projects. If constructed concurrently, they would potentially cause temporary cumulative construction noise to exceed 12-hour 75 dBA L_{EQ}, the construction noise threshold shared by the City and campus. The geographic locations of off-campus projects would generally be expected to result in varying distances to both off-campus NSLUs, on-campus NSLUs, and other on-campus projects. Due to their distances from the campus, their construction-related acoustic contribution to the relevant cumulative noise level would likely not be influential to the campus. Additionally, because the timing of the construction activities for these off-campus cumulative projects might only be estimated, a quantitative analysis that includes them in a set of multiple, concurrent construction projects would be speculative. Furthermore, campus projects would be required to adhere to UC San Diego's thresholds and off-campus cumulative projects would be required to comply with the City of San Diego Municipal Code noise ordinance limits.

The potential cumulative operational impacts related to roadway noise have been analyzed in Section 3.7.3.1 for the 2040 buildout year with the Update to the 2018 LRDP scenario as presented in Tables 3.7-4 and 3.7-5, in which the latter presents the Update's anticipated increase of ambient sound levels over the levels without implementation of the Update. The acoustic contribution due to noise from long-term traffic in Year 2040, aside from influence due to implementation of the Update to the 2018 LRDP, includes consideration of vehicular transportation changes due to regional growth and developments. Impacts were identified as less than significant, and no mitigation is required.

As discussed in Section 3.7.3.1, implementation of the proposed Update to the 2018 LRDP would result in a potentially significant impact to future NSLUs related to stationary noise sources; however, with implementation of mitigation measures Noi-1C through Noi-1E, impacts would be reduced to a less than significant level and would not be cumulatively considerable.

Implementation of the Update to the 2018 LRDP may have a cumulatively considerable effect on the sound environment at the exterior of a given NSLU only if it and one or more concurrent on-campus projects would, in aggregate, cause sound exposure at the exterior of an NSLU to exceed the 12-hour 75 dBA L_{EQ} limit. For example, implementation of the Update to the 2018 LRDP and a concurrent nearby on-campus construction project could each demonstrate 72 dBA 12-hour L_{EQ} at an NSLU, and the resulting logarithmic sum of 75 dBA would be considered a less than significant impact. But if three such concurrent projects were to take place and have the same individual acoustic contribution of 72 dBA, the resulting logarithmic sum would be 77 dBA and thus exceed the impact threshold. Under such a scenario, with implementation of mitigation measure Noi-1F, the construction noise generated from projects associated with the proposed Update to the 2018 LRDP in conjunction with on- and off-campus cumulative projects would be reduced to less than significant and not cumulatively considerable.

In addition, off-campus cumulative projects are required to undergo environmental review and any potentially significant construction noise impacts resulting from their implementation would be required to be mitigated at their respective property lines. Also, as noted above, the off -campus cumulative projects would be required to comply with the City of San Diego Municipal Code noise ordinance limit for construction activities. Therefore, no significant cumulative noise impacts are

anticipated and implementation of the proposed Update to the 2018 LRDP would not result in a cumulatively considerable contribution related to construction noise.

In summary, implementation of the proposed Update to the 2018 LRDP, with the mitigation measures noted above, in conjunction with past, present, and reasonably foreseeable future projects in the UC San Diego campus vicinity, would not result in cumulatively considerable impacts related to exceedance of noise standards or creating substantial temporary and permanent increase of ambient noise levels.

Excessive Groundborne Vibration or Groundborne Noise Levels

The 2018 LRDP EIR concluded that implementation of the proposed 2018 LRDP in conjunction with past, present, and reasonably foreseeable future projects in the UC San Diego campus vicinity would not result in a cumulatively considerable impact related to operational vibration and would not result in a cumulatively considerable impact related to construction vibration. The Update to the 2018 LRDP would not add or change operational sources of vibration from those considered in the 2018 LRDP EIR, and would therefore not result in a cumulatively considerable impact related to operational vibration.

Potential vibration impacts attributable to construction activities such as pile driving are generally limited to buildings and structures located close to the construction site. Hence, unless multiple projects are concurrent and in close proximity to a common vibration-sensitive land use, cumulative vibration impacts are generally not anticipated. However, if implementation of the Update to the 2018 LRDP coincides with one or more of the projects listed in Table 3-1, the same screening distances can be utilized to predict the vibration emission from the equipment or process having the highest expected vibration source energy from each project under consideration.

For example, implementation of the Update to the 2018 LRDP and a concurrent on-campus project could each involve impact pile-driving activity, and the one for which distance to the common NSLU is shortest would likely be the dominant vibration source of concern. Also, as discussed in Section 3.7.3.2, with implementation of Noi-2B, potentially significant construction-related vibration impacts would be mitigated to less than significant and, therefore, not cumulatively considerable.

3.7.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

The following section discusses the other Standard of Significance related to Noise contained in Appendix G of the CEQA Guidelines wherein the proposed Update to the 2018 LRDP was determined to not cause a significant effect.

For a project located within the vicinity of a private airstrip or within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would implementation of the Update to the 2018 LRDP expose people residing or working in the project area to excessive noise levels?

Conditions related to aircraft noise at UC San Diego remain unchanged from what was analyzed in the 2018 LRDP EIR. As discussed in Section 3.7.1.3, the UC San Diego campus is currently subject to periodic overflights by civil and commercial aviation. These conditions are expected to continue into the foreseeable future. While the noise contours for MCAS Miramar were updated since

certification of the 2018 LRDP EIR, the campus remains outside of the 60 CNEL contours of a public airport or public use airport. Implementation of the Update to the 2018 LRDP would therefore not expose people residing or working in the project area to excessive noise levels related to aircraft.

The 2018 LRDP EIR concluded that no potential for significant effect related to proximity to a private airstrip would occur. Based on the above, no new significant impacts or a substantial increase in previously identified impacts would occur with respect to excessive levels of aircraft noise as a result of the Update to the 2018 LRDP. Mitigation measures would not be required, consistent with the conclusions in the 2018 LRDP EIR.

3.7.6 REFERENCES

AECOM. 2018. Noise Technical Report for the 2018 Long Range Development Plan Environmental Impact Report. July 9.

California Department of Transportation (Caltrans). 2013. Caltrans Transportation and Construction Vibration Guidance Manual. September.

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LLG. 2025. Trip Generation Calculations Memorandum. March 14, 2025.

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3.8 POPULATION AND HOUSING

This section describes the existing population and housing conditions on the UC San Diego campus and surrounding areas, including the La Jolla and University communities, the City of San Diego, the County of San Diego, and the State of California. This section also describes the growth in population (students, faculty, staff, and their families) directly and indirectly related to the implementation of the Update to the 2018 LRDP, and the potential population and housing impacts that could result from implementation of the Update to the 2018 LRDP. This section then evaluates whether new or substantially more severe environmental impacts related to population and housing would result from the proposed Update to the 2018 LRDP compared to those identified in Section 3.11, Population and Housing, of the 2018 LRDP EIR.

Changes in population, employment, and housing demand are social and economic effects, not environmental effects. According to CEQA, these effects should be considered in an EIR only to the extent that they create adverse impacts on the physical environment. According to Section 15382 of the CEQA Guidelines, "An economic or social change by itself shall not be considered a significant effect on the environment."

This section is based on UC San Diego population and housing estimates in comparison with the Population and Housing Report for the 2018 UC San Diego Long Range Development Plan, San Diego County, California prepared by AECOM (2018).

3.8.1 ENVIRONMENTAL SETTING

UC San Diego's population and housing quantities and trends are described in Section 3.11 of the 2018 LRDP EIR. This section focuses on changes from the information disclosed in the 2018 LRDP EIR, including updated population forecasts and housing quantities for the UC San Diego campus, the San Diego region, and the state of California. The existing conditions and projections for statewide, regional, and local data are based on the best available data to adequately evaluate potential impacts; however, the data comes from different sources, and as a result, may utilize different timeframes. See table details and footnotes for more information.

3.8.1.1 STATEWIDE SETTING

Population

Statewide population projections have changed since the 2018 LRDP EIR was completed. As shown in Table 3.8-1, *California Population Estimates, 2020-2040*, the population is expected to continue to grow in the coming decades, but at a slower rate. According to the most recent State of California Department of Finance (DOF) projections published in 2022, the total population is anticipated to peak at 40,152,224 in 2044 before gradually declining in the years to follow. Despite a slower growth rate, the state stands to add approximately 586,662 people from 2020 through 2040. Growth projections have decreased from the projections in Section 3.11.1.1 of 2018 LRDP EIR; at that time, the DOF anticipated a population of approximately 45.5 million by 2035.

Table 3.8-1
California Population Estimates, 2020-2040

Year	Population	Population Change	Percent Change
2020	39,520,071	--	--
2025	39,024,054	-496,017	-1.26%
2030	39,430,871	406,817	1.04%
2035	39,872,787	441,916	1.12%
2040	40,106,449	233,662	0.59%

Source: DOF 2023
Note: Population change is the incremental change in the projected statewide population from the previous five-year period. Similarly, the percent change is the projected change in percent of the population from the previous five-year period.

DOF population projections also illustrate a substantial change in the age composition of California's future population. As shown in Table 3.8-2, *California Population Forecast by Age Group, 2020-2040*, the state's population is projected to continue to get older in the coming decades with the largest growth rates in the 65 years and above age group. The youngest age groups, from 0 to 34, are estimated to decline, while those between the ages of 35 to 44 are likely to experience stable growth. At the time, the 2018 LRDP EIR was prepared, all age groups above 19 were expected to experience a positive growth rate.

Table 3.8-2
California Population Forecast by Age Group, 2020-2040

Age Group	2020	2025	2030	2035	2040	Population Change	Percent Change
0-4 Years	2,314,428	2,039,080	2,034,398	2,014,993	1,967,887	-346,541	-15.00%
5-19 Years	7,772,586	7,292,973	6,833,630	6,405,198	6,192,111	-1,580,475	-20.33%
20-34 Years	8,358,058	8,435,568	8,272,131	8,246,547	8,013,062	-344,996	-4.13%
35-44 Years	5,005,700	4,774,457	5,061,553	5,448,304	5,376,776	371,076	7.41%
45-64 Years	9,713,515	9,175,849	9,049,138	8,963,621	9,369,266	-344,249	-3.54%
65+ Years	6,355,784	7,306,127	8,180,021	8,794,124	9,187,347	2,831,563	44.55%

Source: DOF 2023
Note: Population change is the incremental change in projected statewide population of an age group from 2020 through 2040. Similarly, the percent change is the projected change in percent of the population of each age group from 2020 through 2040.

Housing

Every eight years, the state sets a target for the number of homes needed for each income level to meet the housing needs of all Californians; these targets and plans for implementation are called the Regional Housing Needs Assessment (RHNA). From 2015 to 2025, the California Department of Housing and Community Development (HCD) anticipated a need for 1.2 million new housing units to keep up with demand (HCD 2022). As of 2020, only 588,244 units were added to the state's housing supply. The most recent RHNA cycle projects a need for 2.5 million new housing units by 2040, and no less than one million of those homes must meet the needs of lower-income households—this is more than double the housing planned for in the last eight-year cycle, which was current at the time the 2018 LRDP EIR was prepared.

University of California

Enrollment at schools within the UC system has increased from 280,380 in 2018 to nearly 300,000 in 2024. In Fall 2024, the UC system enrolled more students than any previous year, with undergraduate enrollment increasing by 1.2 percent and graduate enrollment increasing by 1.6 percent compared to 2023 (UC 2025). The demand for higher education statewide has increased for the last four years, with California undergraduate enrollment increasing, while out-of-state enrollment has decreased.

3.8.1.2 REGIONAL SETTING

Population

The San Diego region's (i.e., County of San Diego) population growth rate is projected to slow in the coming decades, as shown in Table 3.8-3, *County of San Diego Population Estimates, 2020-2040*. Despite this slower growth, the regional population is expected to increase by approximately 115,266 from 2020 through 2040 and reach 3.4 million. The regional growth trends follow a similar pattern as the state, with a declining growth rate but a steadily increasing overall population. Like the statewide population projections, current regional forecasts are lower than the data included in the 2018 LRDP EIR.

Table 3.8-3
County of San Diego Population Estimates, 2020-2040

Year	Population	Population Change	Percent Change
2020	3,301,513	--	--
2025	3,320,866	19,353	0.59%
2030	3,373,792	52,926	1.59%
2035	3,403,354	29,562	0.88%
2040	3,416,779	13,425	0.39%

Source: DOF 2024
Note: Population change is the incremental change in the projected County population from the previous five-year period. Similarly, the percent change is the projected change in percent of the population from the previous five-year period.

In 2020, the population of the San Diego region was approximately 8.4 percent of the overall California population. According to the state and regional projections, the region's share of the state population would increase slightly to 8.5% in 2040. Due to land constraints, state policies and goals, the County of San Diego General Plan, and general plans of incorporated cities in the County, the majority of future regional population and employment growth is expected to occur largely through increased density rather than continued sprawl. The City of San Diego had a total population of approximately 1.37 million in 2022, about 42 percent of the regional total. Based on the SANDAG Series 15 Regional Growth Forecast, the City's population is expected to reach nearly 1.44 million by 2035, still approximately 42 percent of the regional total (SANDAG 2024a).

Housing

Housing production at the regional level is not projected to keep pace with population growth in the coming years. The most recent SANDAG RHNA identified a total demand for 171,685 new housing units from 2021 through 2029 (SANDAG 2024b), while the SANDAG Series 15 Regional Growth Forecast projects that the region will produce an incremental supply of approximately

84,368 new housing units between 2022 and 2029. Note that the RHNA factors in the housing needs generated by universities in the region. Based on these numbers, there is a total annual projected demand of 19,076 new units, while only 10,546 units are projected to be delivered (SANDAG 2024a). Assuming the annual housing production rate for 2021, this would result in a 76,771-unit regional housing deficit during this time period (i.e., 2021 through 2029). This gap between housing demand and supply is consistent with recent historical trends and is larger than the 36,980-unit gap identified in the 2018 LRDP EIR for the 2010 through 2020 time period.

At the subregional level, SANDAG projects that most of the regional housing production from 2022 through 2050 will occur in the City of San Diego (SANDAG 2024a). By 2050, the City of San Diego is expected have a total of 606,452 households or approximately 45 percent of the regional total. This is lower than the projections at the time of the 2018 LRDP EIR, which predicted a total of 640,668 households in the City of San Diego by 2035. Similarly, current projections anticipate that average household size peaked at 2.73 persons per household in 2022, while the 2018 LRDP EIR anticipated a peak of 2.82 persons per household in 2035. Housing trends mimic the population trends described above; comparatively, slower growth and lower total housing numbers are expected at the time of the Update to the 2018 LRDP SEIR than at the time of the 2018 LRDP EIR.

3.8.1.3 LOCAL SETTING

On the local scale, population and housing characteristics relevant as background to the proposed Update to the 2018 LRDP are those for the two City of San Diego community planning areas (CPAs) that encompass the campus, the University CPA and the La Jolla CPA, and the campus itself. As a constitutionally created entity, the University is not subject to local land-use regulation. Information about the CPAs is provided for informational purposes only.

Adjacent Community Plan Areas

The University and La Jolla communities comprise the CPAs around the UC San Diego campus. The University CPA encompasses the areas adjacent to the East Campus and West Campus, the Gliderport, and the La Jolla del Sol properties. The La Jolla CPA abuts the SIO portion of the university.

The City of San Diego does not have land use authority or jurisdiction over the UC San Diego campus or its properties, but UC San Diego growth affects these CPAs and is factored into the plans. One of the overall goals of the City's University CPA is to "[c]reate a physical, social, and economic environment complementary to UC San Diego and its environs and the entire San Diego Metropolitan area." Both community plans have been revised and amended various times over the years and the UC San Diego campus (including the growth projected by the 2018 LRDP) is still featured and accounted for in the plans; however, the UC San Diego planning process is separate from and not under the authority of the CPA planning process.

Population and Housing in Adjacent Planning Areas

Very little undeveloped land is available to accommodate future growth in either the University CPA or La Jolla CPA. Nearly all of the increase in population in both areas is expected to be achieved through redevelopment, increased density and multi-family housing. As shown in Table 3.8-4, *Projected Adjacent CPA Population Growth*, both CPAs are expected to experience a shrinking population and negative growth rate. This is different than the projections that were available for

the CPAs at the time the 2018 LRDP EIR was prepared, which anticipated increasing populations and positive growth rates for both CPAs. In both CPAs, multi-family development is estimated to account for approximately 88 percent of the overall housing growth, as shown in Table 3.8-5, *Projected Adjacent CPA Housing Growth*. Housing quantities are slightly lower for the most recent update in the Update to the 2018 LRDP SEIR than in the 2018 LRDP EIR, though the positive growth rate remains consistent.

Table 3.8-4
Projected Adjacent CPA Population Growth

CPA	2022	2029	2035	2040	Population Change	Percent Change
La Jolla	29,467	28,762	28,675	28,488	-979	-3.32%
University	75,485	73,571	75,686	74,967	-518	-0.69%
Total	**104,952**	**102,333**	**104,361**	**103,455**	**-1,497**	**-1.43%**

Source: SANDAG 2024a
Notes:
- The most recent data available via SANDAG Series 15 is 2022.
- Population change is the incremental change in the projected CPA population growth from 2022 through 2040. Similarly, the percent change is the projected change in percent of the population growth from 2022 through 2040.

Table 3.8-5
Projected Adjacent CPA Housing Growth

CPA	2022	2029	2035	2040	Housing Change	Percent Change
La Jolla	**15,355**	**15,832**	**16,010**	**16,162**	**807**	**5.26%**
Single Family	11,129	11,482	11,479	11,479	350	3.14%
Multi-family	4,226	4,350	4,531	4,683	457	1.08%
University	**27,125**	**27,208**	**28,899**	**28,973**	**1,848**	**6.81%**
Single Family	5,213	5,222	5,222	5,222	9	1.72%
Multi-family	21,912	21,986	23,677	23,751	1,839	8.39%
Total	**42,480**	**43,040**	**44,909**	**45,135**	**2,655**	**6.25%**

Source: SANDAG 2024a
Notes:
- The most recent data available via SANDAG Series 15 is 2022.
- Housing change is the total incremental housing unit change from 2022 through 2040 for each CPA. Similarly, the percent change is the projected change in percent of housing from 2022 through 2040.

UC San Diego Population and Housing

The 2018 LRDP EIR baseline year 2015 UC San Diego campus population and zip code distribution of campus population living off campus has not substantially changed since the 2018 LRDP EIR and can be found in Section 3.11.1.3 of that document. UC San Diego continues to house a substantial number of its total population in housing owned and operated by UC San Diego. As of Fall 2023, the UC San Diego campus had a total supply of 20,325 beds available for students, faculty, and staff, with approximately 3,700 beds in construction, an increase of approximately 9,000 beds that have been added since 2015. As of Fall 2023, enrollment at UC San Diego totaled 42,400, including both graduate and undergraduate students, but excluding clinical residents (UC San Diego 2024a)

Local and Regional Employment Characteristics

Another characterization of the UC San Diego campus population is employment data. In the fall of 2015, total UC San Diego campus employment was 16,000 consisting of faculty and staff. Under the Update to the 2018 LRDP, UC San Diego projects an additional 17,100 employees by 2040. This is an increase from the 2018 LRDP EIR, which expected a 45 percent increase in employees by 2035. Table 3.8-6, *Local and Regional Employment Characteristics, 2022-2040*, illustrates total employment growth in the La Jolla and University CPAs and includes education and healthcare jobs. UC San Diego's employment growth projections are above regional projections, as growth under the Update to the 2018 LRDP is anticipated in the healthcare and research areas which are more employee intensive and require more in-person employee participation.

Table 3.8-6
Local and Regional Employment Characteristics, 2022-2040

CPA	2022	2029	2035	2040	Employment Change	Percent Change
La Jolla	24,807	25,064	25,280	25,567	760	3.06%
University	113,749	114,428	115,118	115,977	2,228	1.96%
County	2,139,083	2,181,532	2,231,573	2,289,762	150,679	7.04%

Source: SANDAG 2024a
Notes:
- The most recent data available via SANDAG Series 15 is 2022.
- Employment change is the total incremental projected employment change from 2022 through 2040 for each geography. Similarly, the percent change is the projected change in the percentage of employment from 2022 through 2040.

3.8.2 REGULATORY FRAMEWORK

As with the 2018 LRDP EIR, there are no federal or state regulations specifically applicable to the Update to the 2018 LRDP regarding population and housing. Applicable regional and non-regulatory local regulations, policies, and programs are described in detail in Section 3.11.2, Regulatory Framework, of the 2018 LRDP EIR. The following section focuses on new or updated regulations and guidance that have occurred since certification of the 2018 LRDP EIR.

3.8.2.1 REGIONAL

San Diego Association of Governments 2021 Regional Plan

SANDAG's Regional Plan was updated since the 2018 LRDP EIR, with the 2021 Regional Plan adopted by the SANDAG Board of Directors on December 10, 2021. The 2021 Regional Plan is a regional transportation and sustainability plan that aims to provide a blueprint for a more livable, equitable, and innovative future (SANDAG 2021). It combines and updates two previous plans, the Regional Comprehensive Plan and the RTP/SCS, into one document that looks towards 2050. As such, the 2021 Regional Plan must comply with specific state and federal mandates, including an SCS per SB 375 that achieves GHG emission reduction targets set by the California Air Resources Board; compliance with federal civil rights requirements (Title VI); and environmental justice considerations, air quality conformity, and a public participation process. The 2021 Regional Plan incorporates five transformational strategies known as the 5 Big Moves, which include:

- Complete Corridors: Roadways that offer dedicated, safe space for everyone, including people who walk, bike, drive, take transit, and use Flexible Fleets, as well as those who drive freight vehicles. Complete Corridors use technology to dynamically manage the flow of traffic.

- Transit Leap: A complete network of fast, convenient, and reliable transit services that connect people from where they live to where they want to go.

- Mobility Hubs: Vibrant centers of activity where transit and on-demand travel options, supported by safe streets, connect people with their destinations and businesses with their customers. Mobility Hubs are also planned to accommodate future growth and development.

- Flexible Fleets: Transportation services of many forms, varying in size from bikes to scooters to shuttles, that offer first- and last-mile connections to transit and alternatives to driving alone.

- Next Operating System: The underlying technology that allows people to connect to transportation services and a digital platform that allows for dynamic management of roadways and transit services.

Every four years, SANDAG prepares an update to the Regional Plan. SANDAG is currently in the process of preparing a Draft 2025 Regional Plan. The updated draft plan and associated EIR is anticipated to be released for public feedback in 2025, with adoption in late 2025 (SANDAG 2024).

Regional Housing Needs Assessment

SANDAG is required by state law to complete a RHNA in consultation with the HCD to determine the region's housing needs in four income categories—very low, low, moderate, and above moderate. The current adopted RHNA for the San Diego region covers the eight-year period from April 15, 2021 through April 15, 2029. The RHNA allocates housing needs in the four income categories for each of the cities and the County to use in their housing element. The cities and County are required to update their housing elements to include RHNA allocations every eight years; updates can be required every four years if updated housing elements are not adopted by certain timelines. The RHNA factors in the housing needs generated by universities in the region, including UC San Diego.

3.8.2.2 LOCAL (NON-REGULATORY)

As discussed in other sections of this supplemental EIR, UC San Diego is part of the UC, a constitutionally created entity of the State of California, with "full powers of organization and government" (Cal. Const. Art. IX, Section 9). As a constitutionally-created State entity, the UC is not subject to municipal regulations of surrounding local governments, such as the City of San Diego General Plan or land use ordinances, for uses on property owned or controlled by the UC that are in furtherance of the UC's education, research, and public-service purposes. However, UC San Diego may consider, for coordination purposes, aspects of local plans and policies for the communities surrounding the campus when it is appropriate and feasible, but it is not bound by those plans and policies in its planning efforts. Thus, UC San Diego has voluntarily reviewed municipal plans for general consistency with the proposed Update to the 2018 LRDP; however, none of the following plans have jurisdiction over UC San Diego.

As discussed above, the University and La Jolla communities comprise the CPAs around the UC San Diego campus. The 2008 City of San Diego General Plan is the comprehensive planning document and vision for the entire City (City of San Diego 2008), while the University and La Jolla CPAs have individual planning documents that experience more frequent updates. The La Jolla Community Plan was last updated in 2014. On July 23, 2024, the City adopted an amended General Plan called Blueprint SD (City 2024). Blueprint SD addresses both the adopted City CAP and SANDAG's 2021 Regional Plan (Regional Plan). The Regional Plan (SANDAG 2021) is a comprehensive regional transportation strategy that encompasses the entire San Diego County area, including UC San Diego. The relevant elements to population and housing in these various plans are described in greater detail in this section.

City of San Diego General Plan

The 2021-2029 Housing Element of the City of San Diego General Plan serves as a policy guide to address the comprehensive housing needs of the City of San Diego (City of San Diego 2021). State law mandates that local governments outline the housing needs of their community, the barriers or constraints to providing that housing, and actions proposed to address these concerns over an eight-year period. The Housing Element includes the following six major goals:

1. Facilitate the construction of quality housing
2. Improve the existing housing stock
3. Provide new affordable housing
4. Enhance quality of life
5. Exemplify sustainable development and growth
6. Publicize housing needs and resources

The Housing Element also encourages universities to partner with others to provide as much student housing as possible on and adjacent to campuses and transit. The Housing Element was not updated as part of the Blueprint SD amendment to the City General Plan.

University Community Plan

The 2016 University Community Plan is described in Section 3.11.2.1 of the 2018 LRDP EIR. The University Community Plan was amended multiple times since the 2018 LRDP EIR to allow increased development densities on certain parcels in the CPA, none of which are included in the planning area of the Update to the 2018 LRDP. On July 30, 2024, the University Community Plan Update was approved by the City of San Diego and it became effective on December 1, 2024 for areas not included in the Coastal Zone.

The following general community goals address housing to accommodate the increased expected population growth in the area:

- Increase the overall capacity of homes across the community to promote a better balance of jobs and housing.

- Revitalize shopping centers into mixed-use areas that provide quality neighborhood amenities alongside multi-family housing stock, while continuing to provide local goods and services.

Specific plan policies addressing population and housing are identified in the Community Plan's Implementation chapter. These policies include the following:

- Establish mixed-use villages throughout the University Community to create opportunities for more homes and jobs, especially in areas that are served by transit, and further the City of Villages strategy.
- Increase the homes available to meet the diverse needs of the University Community.
- Focus higher density housing opportunities near public transit, job centers, and within Sustainable Development Areas.
- Facilitate the development of homes that are affordable to a range of household income levels, sizes, and tenure patterns, including families, employees, and students.
- Encourage affordable housing to be built on-site and make units available to meet the diverse needs of the community, including families, employees, and students.
- Promote housing options that can be comfortably occupied by seniors, including stacked flats, units without internal staircases, and with limited stairs on external paths.
- Encourage a diverse mix of unit sizes and types, such as three-bedroom, shopkeeper, home occupations, residential-work units, and micro-units to accommodate many lifestyles, family sizes, employees, and students.
- Support the development of a variety of building formats to provide functional and visual diversity of housing options throughout the community while maintaining stylistic compatibility.
- Support the development of housing that is affordable to and meets the needs of the employees in the University Community to attract employees, support reduced commute times, increase active transportation, and minimize transportation costs.
- Provide additional affordable housing through new development within the University Community above the citywide requirement.
- Strive to affirmatively further fair housing by providing access to services, resources, jobs, and housing opportunities within walking distance to transit.
- Work with development applicants to provide dwelling units affordable to households whose income does not exceed 80 percent of the area median income in all residential development rather than paying an in-lieu fee, to the maximum extent feasible.

In addition, the University Community Plan Update's general requirement SDR-J.1 includes an affordable homes requirement, where development projects with residential uses must incorporate onsite affordable dwelling units, provide offsite units within the area, or pay an Inclusionary Affordable Housing In-Lieu Fee.

3.8.3 PROJECT IMPACTS AND MITIGATION

3.8.3.1 ISSUE 1 —INDUCEMENT OF SUBSTANTIAL UNPLANNED POPULATION GROWTH

Population and Housing Issue 1 Summary

Would implementation of the Update to the 2018 LRDP induce substantial unplanned population growth in an area, either directly or indirectly?

2018 LRDP EIR Significance Conclusion	Significant and unavoidable (direct); less than significant (indirect).
Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Significant and unavoidable (direct); less than significant (indirect).
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts	No feasible mitigation is available for direct inducement of substantial population growth in the area.

Summary of Analysis in the 2018 LRDP EIR

Section 3.11.3.1 of the 2018 LRDP EIR concluded that the population increase resulting from the proposed 2018 LRDP (consisting of four percent of the 462,423 regional population increase) would be considered substantial; therefore, implementation of the proposed 2018 LRDP would result in direct impacts relating to substantial inducement of population growth in the area. However, the 2018 LRDP was found to not result in an indirect impact associated with inducement of substantial population growth in the area. The impact was considered significant and unavoidable for direct impacts and less than significant for indirect impacts.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP projects a higher campus population than the 2018 LRDP, warranting a reanalysis of the project's impacts.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Regional and local population projections have changed since the 2018 LRDP EIR; the San Diego region anticipates slower population growth and a smaller total population than was predicted in the 2018 LRDP EIR. As a result, UC San Diego's proportional contributions to regional populations may have changed, warranting a reanalysis of the project's impacts.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the 2018 LRDP may have a significant impact if it would induce substantial unplanned 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).

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

Statewide, regional, and local population and employment data and growth projections are used to assess the Update to the 2018 LRDP's impacts on population and housing. A comparison of campus growth proposed under the 2018 LRDP and the Update to the 2018 LRDP is provided.

Impact Analysis

Table2-3, *Total Projected Campus Population Growth Comparison*, details the UC San Diego campus population as of fall 2024, projected population by 2040 under the proposed Update to the 2018 LRDP, and the difference in projected growth between the 2018 LRDP and the Update to the 2018 LRDP. The total population includes two categories:

- Students – undergraduate, general graduate, masters, and health sciences students.
- Staff and Faculty – faculty, researchers, general academic, medical residents, and other non-instructional employees.

As of 2015, the UC San Diego campus had a total population of 48,850 students, faculty, and staff, as shown in Table 2-3. The proposed Update to the 2018 LRDP increases the 2018 LRDP's total projections by 2035 (65,600 persons) by 30,700 individuals, for a total of 96,300 students, faculty, and staff by 2040.

As noted earlier in this section, the UC San Diego population growth assumed by the 2018 LRDP is accounted for in SANDAG's population projections for San Diego County and in the City of San Diego's General Plan, University Community Plan, and La Jolla Community Plan and Local Coastal Program Land Use Plan. Specifically, the City General Plan (Blueprint SD), SANDAG's projections, and University Community Plan Update have been updated with projections from the 2018 LRDP. However, the population increase projected by the Update to the 2018 LRDP has not yet been accounted for in existing regional and local plans, though UC San Diego staff have coordinated the increased projections of the proposed Update with both the City of San Diego and SANDAG planning

staff. If approved, the Update to the 2018 LRDP's new projections would be incorporated into future regional and local planning efforts.

The regional population is expected to increase by approximately 115,266 from 2020 through 2040 and reach 3.4 million, which is a smaller increase than what was projected during preparation of the 2018 LRDP. The 2018 LRDP anticipated that campus growth would account for approximately 4 percent of regional growth by 2035. Due to reduced regional population projections and increased UC San Diego population projections, the population increase resulting from the proposed Update to the 2018 LRDP would bring UC San Diego's share of the regional population growth by 2040 to approximately 26 percent. This would be a larger proportion of the regional increase from what was evaluated in the 2018 LRDP EIR due to both the increased UC San Diego population forecasts and the reduced regional forecasts since 2018. It should be noted that UC San Diego's projected population growth numbers include future students, staff, and faculty who already reside in the region. Therefore, UC San Diego's share of the regional population growth would likely be lower than 26 percent. In addition, the Update to the 2018 LRDP provides an additional 12,780 beds to help accommodate the housing needs for future student populations. Regardless, UC San Diego would induce substantial unplanned population growth, resulting in a significant impact. The impact would be consistent with the conclusion in the 2018 LRDP EIR. The consequences of this population growth in the area (e.g., its effects on the environment) are analyzed in this EIR.

Increasing campus housing is a key driver of the Update to the 2018 LRDP. The proposed Update to the 2018 LRDP includes additional student housing that would, in part, address the effects of the anticipated population growth on the surrounding region. The increased housing under the Update to the 2018 LRDP would allow the campus to continue to house approximately 65 percent of its projected student enrollment by 2040, reducing demand for off-campus student housing. Still, the increased population would incrementally increase the demand for local and regional housing supply. However, the campus would continue to implement its TDM programs to reduce the traffic and associated air quality and GHG emissions impacts of additional students, faculty, and staff commuting to and from campus. In addition, UC San Diego has also updated its Master Utility Studies (Latitude 33 2025) alongside the proposed Update to the 2018 LRDP to ensure that the campus' utility infrastructure is adequate to serve the increased growth. This SEIR includes mitigation measure Util-1 and Util-2 which will also ensure that no downstream impacts on the City's sewer system occur (see Section 3.12, Utilities, Service Systems, and Energy, of this SEIR).

Regarding indirect inducement of population growth, development under the proposed Update to the 2018 LRDP would consist of infill development and redevelopment of existing low-density sites and/or structures on campus to accommodate the population growth and expanded program needs. No new off-campus roads would be required and utility improvements, including those that may be required by mitigation measures Util-1 and Util-2, would be sized appropriately for projected campus growth. Therefore, the proposed Update to the 2018 LRDP would not result in indirect inducement of substantial population growth in the area.

Level of Significance Before Mitigation

Direct impacts would be potentially significant, while indirect impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

The 2018 LRDP resulted in a significant impact related to direct inducement of substantial population growth. Because the 2018 LRDP included campus population growth as an essential objective, no mitigation was found to be feasible to avoid or reduce this impact. Therefore, the impact was considered significant and unavoidable.

The 2018 LRDP was found to have a less than significant impact related to indirect inducement of substantial population growth; therefore, no mitigation measures were required.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

Similar to what was determined in the 2018 LRDP EIR, no mitigation would be feasible to avoid or reduce the impact to direct inducement of substantial population growth. However, mitigation measures, such as Util-1 and Util-2, would be implemented as part of the Update to the 2018 LRDP which would address and reduce impacts related to population growth.

Level of Significance After Mitigation

The direct impact related to inducement of substantial population growth would remain significant and unavoidable, consistent with the conclusion in the 2018 LRDP EIR. In addition, although the population increase due to implementation of the Update to the 2018 LRDP would be larger than what was identified under the previous 2018 LRDP, the provision of additional housing for the increased growth would alleviate the effects of this increased growth.

Indirect impacts related to inducement of substantial population growth would be less than significant, similar to the 2018 LRDP EIR.

3.8.3.2 ISSUE 2 — DISPLACEMENT OF HOUSING

Population and Housing Issue 2 Summary

Would implementation of the Update to the 2018 LRDP displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes Result in New Significant Impacts or Substantially More Severe Significant Impacts?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

Section 3.11.3.2 of the 2018 LRDP EIR concluded that implementation of the proposed 2018 LRDP would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere. The impact would be considered less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated development densities and land use designations have changed since preparation of the 2018 LRDP EIR, warranting revisions to the 2018 LRDP EIR.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

No substantial changes with respect to circumstances or new information of substantial importance have occurred with respect to housing displacement.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

This section provides updated data on the existing housing (beds) and planned growth of housing through the 2040 horizon year to determine whether the Update to the 2018 LRDP SEIR would result in substantial displacement of existing people or housing, necessitating the construction of replacement housing elsewhere.

Impact Analysis

Of the 38,620 student beds projected for 2040, which includes beds to accommodate family housing, 36,500 beds would be provided directly for students. As noted in the Project Description, the projected 2040 student enrollment would be 56,000, which includes an additional 13,600 students from what was previously analyzed (See Table 2-3). Therefore, in line with the LRDP objective and the University's goals, 65 percent of the student population would be housed on campus. This is a higher percentage compared to the 2018 LRDP EIR, which included 25,843 student beds for a projected population of 42,400 (61 percent).

The remaining 35 percent of students that are not housed on-campus would seek nearby housing in off-campus communities. Housing quantities in the surrounding area are anticipated to increase, mainly through the addition of medium- and high-density housing as part of existing City plans, such as the University City Community Plan update. This includes the allowed addition of 29,000 housing units within the University City CPA from what was previously authorized by the preexisting community plan (City 2024). In addition, the San Diego Trolley's Blue Line now provides reliable transit access to the campus from more distant communities and neighborhoods, such as Downtown San Diego, Mission Valley, Pacific Beach, and cities in the South Bay. Furthermore, off-campus housing would not be removed due to implementation of the Update to the 2018 LRDP. Although more students would live off-campus, with the anticipated increase in housing in the University CPA and dispersion of off-campus student population within the region, implementation of the Update to the 2018 LRDP would not displace a substantial number of people in the La Jolla or University CPAs.

Existing campus housing could at times be displaced temporarily as a result of redevelopment or renovations of UC San Diego housing facilities; however, it is likely that redevelopment and/or renovations would be timed to occur or begin over the summer months, when student and employee populations would be temporarily reduced. This practice is in line with previous redevelopment projects at UC San Diego, such as the Pepper Canyon West and Ridge Walk North Living and Learning Neighborhoods. Furthermore, consistent with existing practice, UC San Diego would monitor the on-campus population and stagger opening of new housing facilities as development occurs within the campus to maximize the amount of on-campus housing and reduce the probability of a single-year decrease in housing. Therefore, implementation of the proposed Update to the 2018 LRDP would not displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere.

Level of Significance Before Mitigation

The impacts would be considered less than significant, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

3.8.4 CUMULATIVE IMPACTS AND MITIGATION

Population and Housing Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative population and housing impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Direct inducement of substantial population growth in an area.	Significant (Direct); Less than Significant (Indirect).	Cumulatively considerable (Direct); Not cumulatively considerable (Indirect).	Significant (Direct); Less than Significant (Indirect).	Cumulatively considerable (Direct); Not cumulatively considerable (Indirect).
Indirect inducement of substantial population growth in an area.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Regional displacement of housing and people.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.

The geographic context for cumulative impacts on population and housing is the San Diego region.

Direct Inducement of Substantial Population Growth in an Area

Section 3.11.4 of the 2018 LRDP EIR concluded that direct impacts to population growth would be significant and cumulatively considerable. The region's population growth is accounted for in

SANDAG's population projections for San Diego County and within the City of San Diego, including the individual municipalities' General Plans and community plans. Within the San Diego region, the population is expected to increase by approximately 115,266 people from 2020 through 2040 and reach 3.4 million people, which is considered to be cumulatively significant without the project.

With implementation of the proposed Update to the 2018 LRDP, the UC San Diego campus population is projected to increase by an additional 30,700 students, faculty, and staff over what was assumed in the 2018 LRDP for a total of 96,300 people by 2040. Some of the students, faculty, and staff would be from the San Diego region; however, it is possible that a large percentage would be from outside the San Diego region. Approximately one quarter of enrolled undergraduate students originate from the San Diego region; about half of the students originate from elsewhere in California and approximately 25 percent are out-of-state or international students (UC San Diego 2022). As described in Section 3.8.3.2, the Update would include additional housing for students, thereby reducing the effects of the additional growth. In addition, a large proportion of the additional staff and faculty population would be drawn from the existing regional workforce. Regardless, the proposed Update to the 2018 LRDP would result in direct inducement of substantial population growth in the area. The increase in UC San Diego population growth from the 2018 LRDP was accounted for in SANDAG's population projections for San Diego County; however, the additional 30,700 people proposed in the Update beyond what was projected in the 2018 LRDP was not assumed. The Update would be incorporated in SANDAG's 2025 projections. Because the regional population increase would be less than what was projected in the 2018 LRDP and UC San Diego's population is anticipated to increase, the population increase resulting from the proposed Update to the 2018 LRDP would be a much higher proportion of the regional total increase from what was evaluated by the 2018 LRDP (4 percent). With the proposed projections included in the Update to the 2018 LRDP, UC San Diego's increased population would be approximately 26 percent of the regional total increase and would be considered substantial. Therefore, the impact is considered cumulatively considerable and unavoidable.

Indirect Inducement of Substantial Population Growth in an Area

Section 3.11.4 of the 2018 LRDP EIR concluded that indirect impacts would be less than significant and not cumulatively considerable. Regarding cumulative indirect inducement of substantial population growth in an area, the San Diego region would contribute to the indirect inducement of population growth as people move into the region for jobs, colleges, or a choice to relocate to San Diego. Projects off campus would be required to comply with city or county requirements to provide new roads or utility improvements, as needed, to service the new population. Off campus, construction of new roads or utility projects would be subject to environmental review documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies, and recommendations of General Plans. In general, compliance with federal, state, and local regulations would address impacts associated with new construction of, or improvements to, roads or utility projects. These standard practices would then help reduce the incremental effects of indirect population growth in the region. Development under the proposed Update to the 2018 LRDP would consist of infill development and redevelopment of existing low-density sites and/or structures on campus to accommodate the population growth and expanded program needs. No new roads would be constructed, and utility improvements would be sized to accommodate projected campus growth, including the sewer infrastructure improvements that may be required by mitigation measures Util-1 and Util-2. Therefore, the proposed Update to the 2018 LRDP would not result in cumulative indirect inducement of substantial population growth in the area. The impact would not be cumulatively considerable, consistent with the conclusion in the 2018 LRDP EIR.

Regional Displacement of Housing and People

Section 3.11.4 of the 2018 LRDP EIR concluded that impacts related to the regional displacement of housing and people would be less than significant and not cumulatively considerable. Regarding regional displacement of housing and people under the Update to the 2018 LRDP SEIR, development in the region is likely to result in the displacement of housing and people, as regional population growth is expected to continue to outpace housing production. However, as noted in Section 3.8.1.2, regional population forecasts indicate a slowing of population growth in the region, as compared to what was analyzed in the 2018 LRDP EIR, where the regional population was anticipated to grow by 462,423 people to 3.7 million by 2035. Current forecasts indicate that the region will only grow by approximately 115,266 people, with a population of 3.4 million by 2040. The proposed Update to the 2018 LRDP projects that UC San Diego would grow by 30,700 by 2040. While this would be an increase over what was analyzed in the 2018 LRDP EIR, due to the decreased regional projections, it would not result in an increase in the regional population above what was analyzed in the 2018 LRDP EIR. Furthermore, the Update to the 2018 LRDP would provide an additional 12,780 net new beds to accommodate the increase in students and staff. The Update to the 2018 LRDP would not contribute to the regional displacement of housing and people. Impacts would not be cumulatively considerable, consistent with the conclusion in the 2018 LRDP EIR. For discussion of cumulative impacts related to off-campus housing demand resulting from implementation of the proposed Update to the 2018 LRDP, refer to Section 4.3, *Growth Inducement*, of this SEIR.

3.8.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under population and housing are evaluated above. There are no CEQA issues where there is no potential for a significant effect related to population and housing.

3.8.6 REFERENCES

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3.9 PUBLIC SERVICES

This section of the SEIR evaluates the potential for impacts to public services associated with implementation of the Update to the 2018 LRDP. This section characterizes existing and proposed public services and evaluates whether new or substantially more severe significant environmental impacts related to public services would result from the proposed Update to the 2018 LRDP SEIR compared to those identified in Section 3.9 of the previous EIR. Effects associated with recreation services, such as parks, are evaluated in Section 4.1.7, Recreation, of this SEIR.

3.9.1 ENVIRONMENTAL SETTING

The public services offered at UC San Diego and the surrounding areas are described in detail in Section 3.12, Public Services, of the 2018 LRDP EIR, including discussion of fire protection services, police services, schools, and relevant state regulations. This section focuses on changes from information disclosed in the 2018 LRDP EIR and provides an updated analysis of impacts on public services relative to revisions proposed in the Update to the 2018 UC San Diego LRDP and current regulations.

3.9.1.1 FIRE PROTECTION

UC San Diego Fire Protection

UC San Diego does not have its own fire department and therefore relies on the City of San Diego Fire-Rescue Department (SDFR) to respond to all applicable emergencies, as discussed below. However, UC San Diego does employ a Fire Marshal and staff who are responsible for campus-wide fire prevention and safety. Section 3.12.1.1 of the 2018 LRDP EIR discusses the Fire Marshal's responsibilities, which include providing services such as plan review and construction inspections of new construction and alterations or renovations to existing buildings and facilities.

As discussed in Section 3.12.1.1 of the 2018 LRDP EIR, UC San Diego is responsible for amending the campus emergency evacuation planning to ensure that adequate fire protection equipment access is maintained on campus at all times when new development, redevelopment, or site improvements occur at UC San Diego. The City Deputy Fire Marshal meets with the UC San Diego Fire Marshal as needed to review and revise site access plans to adequately serve the campus. See Section 3.12.1.1 of the 2018 LRDP EIR for additional information regarding brush management techniques and regulations, and facilities management, as well as Section 3.9.2.2 regarding the UC San Diego Emergency Operations & Incident Management Plan.

City of San Diego Fire-Rescue Department

The SDFR is responsible for responding to emergencies that occur in the communities that surround the UC San Diego campus as well as on the campus itself. Section 3.12.1.1 of the 2018 LRDP EIR identifies the most likely fire station facilities to respond to incidents on the UC San Diego campus, as well as fire station facilities within the vicinity of the UC San Diego campus and provides their distance and approximate drive time to campus. In addition, the 2018 LRDP EIR identifies the SDFR response times within the vicinity of the UC San Diego Campus.

According to the Fire Services Deployment Planning Study prepared by the City of San Diego and discussed in Section 3.12.1.1 of the 2018 LRDP EIR, there were insufficient fire crews and stations to allow the City to meet its desired services response times in many areas, specifically within the northern portion of UC San Diego and areas north of campus. To mend this gap in coverage, a new fire station on the UC San Diego campus was proposed on the east side of North Torrey Pines Road, south of Genesee Avenue. The Final Mitigated Negative Declaration (State Clearinghouse Number 2018061017) for the fire station project was adopted on August 30, 2018, and was subsequently approved. Construction of the Torrey Pines Fire Station 52 began on October 17, 2022, and became operational in October 2024. The two-story facility comprises more than 14,000 square feet of space. Torrey Pines Fire Station 52 is located within SDFD's Battalion 5 and serves the University City area and surrounding communities (City 2022). The 2018 LRDP EIR concluded that once the new Fire Station 52 was operational, in combination with Station 50 on Nobel Drive, the entire community and campus would be adequately served by the SDFR (refer to Section 3.12.3 of the 2018 LRDP EIR).

As discussed in Section 3.12.1.1 of the 2018 LRDP EIR, SDFR Fire Station Number 56 operated as a Fast Response Squad, which did not have the full capability of a fire station or traditional fire engine; it carried a two-person fire crew, consisting of a Fire Captain/EMT and a Firefighter/ Paramedic. In December 2020, following the certification of the 2018 LRDP EIR, Fire Station Number 50 became operational. The opening of this new station eliminated the need for Fire Station Number 56 Fast Response Squad (University City News 2020) which was subsequently shut down.

Table 3.9-1, *Fire Protection Facilities and Response Times in the Vicinity of the UC San Diego Campus,* describes the six SDFR fire station facilities within the vicinity of the UC San Diego campus and updates Table 3.12-1 from the 2018 LRDP EIR. As shown in Table 3.9-1, Fire Station Number 52 was constructed at the northwest corner of campus and would therefore be the most likely to respond to incidents on the UC San Diego campus.

Table 3.9-1
Fire Protection Facilities and Response Times in the Vicinity of the UC San Diego Campus

SDFR Fire Station	Address	Staffing/ Equipment	Distance to UC San Diego*	Drive Time to UC San Diego**
9	7870 Ardath Lane, La Jolla, CA 92037	Four-person engine company, two-person Paramedic Unit	3.5 miles	6.6 minutes
16	2110 Via Casa Alta, La Jolla, CA 92037	Four-person engine company	5.2 miles	9.49 minutes
35	4285 Eastgate Mall, La Jolla, CA 92037	Four-person engine company, four-person brush engine, chemical pickup rig and Battalion Chief vehicle	2.2 miles	4.39 minutes
41	4914 Carroll Canyon Road, San Diego, CA 92138	Four-person engine company, two-person medic rig, and Urban Search and Rescue rig	3.8 miles	7.11 minutes
50***	7177 Shoreline Dr, San Diego, CA 92112	Ten-person crew	4.4 miles	10 minutes

SDFR Fire Station	Address	Staffing/ Equipment	Distance to UC San Diego*	Drive Time to UC San Diego**
52***	East side of North Torrey Pines Road, south of Genesee Avenue	Nine-person crew, three apparatus bays	Located at the northwest corner of the UC San Diego campus	0 minutes
56	3034 Governor Drive	Two-person EMT/ Paramedic crew, tools, equipment and supplies, and small quantity of water and foam.	4.6 miles	8 minutes

Source: Citygate Associates 2017; City 2022.
Notes:
*Distance measured to northwest corner of UC San Diego campus
** Assumes travel to the primary project's farthest end from each SDFR fire station, a 35 miles per hour travel speed, and does not include donning turnout gear and fire dispatch time
***This table is updated to reflect the additional SDFR facilities that have been added in the vicinity of campus since the certification of the 2018 LRDP, including Fire Station Number 50, which has been operational since December 2020, and Fire Station Number 52, which became operational in October 2024.

The SDFR continues to use the Citygate Report (2017) to address the deployment of fire resources within its jurisdiction. Specifically, this includes: (1) the initial response of fire suppression recourse, consisting of a four-person engine company, within four minutes; and (2) an effective fire force, consisting of 15 firefighters, within eight minutes. Based on the Citygate Report, the City adopted the performance measure that first due units to treat medical patients and control small fires should arrive within 7.5 minutes 90 percent of the time from the receipt of the 911 call in fire dispatch (Citygate 2017). According to 2023 response time data from the SDFR, actual response times average 8:02 minutes 90 percent of the time across all stations in the City (SDFR 2024).

Based on the SDFR data mentioned above, the stations currently closest to campus (i.e., 9 and 35) average response times over eight minutes 90 percent of the time (SDFR 2024). As mentioned in Section 3.12.1.1 of the 2018 LRDP EIR, the City of San Diego prepared a Fire Services Deployment Planning Study (later updated in 2016) that concluded there are insufficient fire crews and stations to allow the City to meet its desired services response times in many areas (Citygate 2011). The study results identified that the northern portion of UC San Diego and areas north of the campus were underserved by existing fire protection services. As a result, the University provided land and funding for the construction of Fire Station 52, which is now operational. During Fiscal Year 2023, only 3.3 percent of citywide incidents in which the fire department responded to an emergency call were fire related. Of the remaining 96.7 percent, 95.5 percent were medical/rescue related, 0.1 percent were event related, and 1.1 percent were characterized as "other" (City 2024a).

3.9.1.2 POLICE SERVICES

As discussed in Section 3.12.1.2 of the 2018 LRDP, UC San Diego provides its own police services for the campus as well as other off-campus properties, such as La Jolla del Sol. Pursuant to California Education Code Section 67381, the UC San Diego Police Department and the San Diego Police Department (SDPD) have adopted and signed, as of January 6, 1999, a written agreement that clarifies and affixes operational responsibilities for the investigation of violent and non-violent crimes occurring on UC San Diego property. The UC San Diego Police Department has primary jurisdiction over all UC San Diego-administered properties and has enforcement capabilities up to

one mile surrounding the campus; however, both agencies continue to provide mutual aid assistance as appropriate, when requested.

UC San Diego Police Department

As discussed in Section 3.12.1.2 of the 2018 LRDP EIR, the UC San Diego Police Department is empowered pursuant to Section 830.2 (b) of the California Penal Code and fully subscribes to the standards of the California Commission on Peace Officer Standards and Training. For a detailed analysis of services provided by the UC San Diego Police Department, facility locations, and department organization, see Section 3.12.1.2 of the 2018 LRDP EIR.

Currently, the UC San Diego Police Department employs 50 sworn police officers, 48 non-sworn employees, and 75 UC San Diego students (under the campus community service officers [CSO] program) (UC San Diego 2024); this is a slight increase from the 44 sworn police officers at the time the 2018 LRDP EIR was prepared. The UC San Diego Police Department has not adopted response time goals or standards.

As shown in Table 3.9-2, *Average Officer Response Times for the 2023-2024 Academic Year*, the average response time for the UC San Diego Police Department was 7 minutes and 18 seconds during the 2023-2024 Academic Year, a substantial improvement over the 9 minute and 43 second average response time cited in the 2018 LRDP EIR for the 2015-2016 Academic Year.

Table 3.9-2
Average Officer Response Times for the 2023-2024 Academic Year

Month	Response Time (minutes)
September 2023	7:02
October 2023	7:12
November 2023	7:31
December 2023	6:44
January 2024	7:22
February 2024	7:33
March 2024	7:28
April 2024	7:09
May 2024	8:36
June 2024	6:24
2023-2024 Average	**7:18**

Source: Olaiz-Cano 2024

According to the *UC San Diego Annual Security & Fire Safety Report* (2023), which provides a summary of criminal activity reported to the UC San Diego Police Department, a total of 416 crimes were reported in 2022 (UC San Diego 2023). According to the 2023 UC San Diego Annual Security & Fire Safety Report, this represents a 126 percent increase from the number of crimes reported in 2021 (184 reported crimes) and a 240 percent increase from the number of crimes reported in 2020 (122 reported crimes). This increase is primarily attributed to higher motor vehicle thefts, the majority of which are electric scooters and electric bicycles, which have become more prevalent on campus in recent years (UC San Diego 2023). The UC San Diego Police Department has also seen an increase in some criminal incidents as expanding regional public transportation opportunities, such as the UC San Diego Blue Line Trolley, have improved accessibility to the campus for the broader population (UC San Diego 2023).

City of San Diego Police Department

As discussed in the 2018 LRDP, the SDPD's Northern Division is responsible for police protection services in the communities surrounding the UC San Diego La Jolla campus. The Northern Division headquarters are located at 4275 Eastgate Mall, approximately 0.2 miles east of the southeast corner of campus. This division serves the neighborhoods of Bay Ho, Bay Park, Carmel Valley, Clairemont Mesa East, Clairemont Mesa West, La Jolla, Mission Bay Park, Mission Beach, North Clairemont, Pacific Beach, Torrey Pines, and University City.

The SDPD sets response time goals for different levels of emergencies. According to the San Diego General Plan, average response time guidelines are as follows: Priority E Calls (imminent threat to life) within seven minutes; Priority 1 Calls (serious crimes in progress) within 12 minutes; Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes; Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes; Priority 4 Calls (minor requests for police service) within 90 minutes (City 2022).

As discussed above, the UC San Diego Police Department has primary jurisdiction over crimes that occur on UC San Diego-owned property and would be the first to respond to any on-campus situation, with the exception of homicide/manslaughter. Although SDPD would assist the UC San Diego Police Department in certain scenarios, SDPD is rarely required to respond to on-campus calls for police services.

3.9.1.3 SCHOOLS

As discussed in Section 3.12.1.3 of the 2018 LRDP EIR, SDUSD provides kindergarten through 12th grade educational services to approximately 80 percent of the City of San Diego (City 2024b). The 2018 LRDP EIR utilized data from the 2015-16 school year in its analysis, which can be found in detail in Section 3.12.1.3 of the 2018 LRDP EIR. The analysis assumed that demand for kindergarten through 12th grade public education facilities generated by the UC San Diego on-campus population was associated primarily with married students, faculty, and staff.

As of the 2023-24 school year, SDUSD consists of 117 active elementary schools, 46 active secondary schools (including 24 middle/junior high schools and 22 high schools), and 13 active atypical/alternative schools. In addition, there are 49 charter schools and 5 additional program sites (SDUSD 2024). Total SDUSD student enrollment for all district and charter schools was 112,790 students in the 2022-23 school year (Ed Data 2024). Pursuant to the California Department of Education regulations, SDUSD applies the following guidelines in the planning of school facilities: (1) Elementary schools may have a maximum enrollment of 700 students and 7 acres of space is required; (2) Junior high/middle schools may have a maximum enrollment of 1,500 students and 15 acres of space is required; and (3) Comprehensive senior high schools may have a maximum enrollment of 2,000 students and 25 acres of space is required (City 2024b).

As described in Section 3.12.3.3 of the 2018 LRDP EIR, there are bond measures that are used to fund repairs, renovations and revitalizations of existing schools within SDUSD. In addition to Proposition S that was passed in 2008 and Proposition Z that was passed in 2012, another measure passed in 2018, Measure YY, is a $3.5 billion bond that focuses on further infrastructure and safety upgrades, emphasizing seismic retrofitting, fire safety, and ADA compliance, ensuring schools are safe and equipped for diverse needs. Proposition 2 ($10B) approved in 2024 would fund modernization and new construction for Transitional Kindergarten [TK] through 12th grade schools.

Section 3.12.1.3 of the 2018 LRDP EIR discusses the SDUSD facilities that would accommodate most school aged children that reside in the UC San Diego housing areas, which are the same schools expected to accommodate children residing in housing areas with implementation of the Update per SDUSD. The Instructional Facilities Planning Department (IFPD) at SDUSD provided a letter dated August 6, 2024, which included a summary of existing student enrollment information for students residing in UC San Diego La Jolla Campus housing in 2023 (Oviatt 2024). According to SDUSD, as of 2023, 185 school-aged children (TK through 12th grade) resided on campus.

3.9.1.4 PARKS AND RECREATION SERVICES AND FACILITIES

Refer to Section 4.1.7 of this SEIR for a discussion of on- and off-campus park and recreation facilities and services.

3.9.2 REGULATORY FRAMEWORK

Similar to the 2018 LRDP EIR, there are no federal or non-regulatory (e.g., City of San Diego) public services regulations that apply to the Update to the 2018 LRDP. Applicable state regulations are discussed below.

3.9.2.1 STATE

California Building Code

The CBC, contained in Part 2 of Title 24 of the CCR, was last updated in 2022 and identifies building design standards, including those for fire safety. Typical fire safety requirements of the CBC include the installation of fire sprinklers in all new high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas; and use of fire-resistant plants and drip irrigation in landscaping, particularly near buildings.

Chapter 7A of the CBC, Materials and Methods for Exterior Wildfire Exposure, prescribes building materials and construction methods for new buildings in a Fire Hazard Severity Zone, which portions of the campus are located in (see also Section 3.13, Wildfire). Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures.

California Fire Code

The California Fire Code (CFC) was last updated in 2022 and incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California, including the University of California.

California Building Standards Code

The California Building Standards Code (CBSC), also known as Title 24, was last updated in 2022 and contains regulations that govern structural safety and sustainability. The CBSC includes the CBC and CFC, described above, and standards regarding electrical and mechanical design; energy conservation and green building standards; and historic preservation.

3.9.2.2 UC SAN DIEGO

UC San Diego Fire Marshal

As part of the EH&S department, the Campus Fire Marshal supports the enforcement of fire safety and response measures across the campus through a combination of fire prevention, inspection, and emergency planning activities. The Fire Marshal operates in collaboration with the EH&S department and local fire agencies such as SDFR to ensure compliance with the California Fire Code and other regulatory standards. The Fire Marshal ensures campus fire protection systems are inspected, tested, and maintained in accordance with applicable regulations and nationally recognized standards. Responsibilities include reviewing building plans to ensure adherence to fire prevention building codes, developing fire prevention programs and conducting training on fire safety protocols, working with campus departments to develop and implement emergency response plans and creating building-specific evacuation procedures for emergency preparedness, incident investigation, and wildfire risk management.

Emergency Operations & Incident Management Plan

UC San Diego's Emergency Operations & Incident Management Plan provides the framework for an organized and trained response to various human-caused and natural emergency situations including fires, hazardous spills, earthquakes, flooding, explosion, and civil disorders. The Plan is activated when a “state of emergency” is declared whenever there is a threatened or actual condition of disaster or extreme peril which cannot be managed by ordinary campus procedures. The Plan is reviewed periodically and is implemented by campus emergency response staff in four phases: mitigation, preparedness, response, and recovery. The mitigation phase is used to evaluate hazards and risks and provide for the development of hazard mitigation and contingency plans. The preparedness phase focuses on identifying actions that increase emergency preparedness. This includes testing of alert systems, training of personnel, and public information efforts to raise awareness of emergency services programs. The response phase identifies immediate response activities needed within the first few hours to deal with medical issues, containment of hazardous materials releases, assessment of building damage, etc. The recovery phase identifies procedures to restore University functions to pre-event conditions and secure reimbursement grants to cover physical damage to the campus. The Emergency Operations & Incident Management Plan is not a published plan, but is administered by the UC San Diego Emergency Management & Business Continuity Team to address campus emergencies.

3.9.3 PROJECT IMPACTS AND MITIGATION

3.9.3.1 ISSUE 1 — FIRE PROTECTION FACILITIES

Public Services Issue 1 Summary

Would implementation of the Update to the 2018 LRDP result in substantial adverse physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire services?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

Section 3.12.3.1 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. The 2018 LRDP was determined not to directly increase demand to a level that would require new facilities or substantial alterations to existing facilities beyond the new facilities that the City of San Diego had already planned to address the cumulative demand for facilities across the whole of the City. Consequently, the impact was determined to be less than significant and no mitigation measures were required.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes growth in population that could increase the need for public services that would require new or altered fire protection facilities, in the campus vicinity.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to circumstances under which the Update to the 2018 LRDP would be undertaken, and no substantial new information regarding fire protection facilities has been identified since the certification of the 2018 LRDP EIR.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP could have a significant impact if demand for fire capacity would result in substantial adverse physical impacts associated with the need or provision of new or physically altered governmental facilities. Such changes would be considered significant if they lead to substantial adverse environmental impacts. The need for new or altered facilities would be evaluated based on the ability of existing facilities and services to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

As discussed above, the 2018 LRDP identified the need for additional fire protection facilities to serve the UC San Diego campus and surrounding community based on response times not meeting the identified City standards. This section is updated to evaluate the changes proposed under the Update and reflect the additional SDFR facilities that have been added in the vicinity of campus since the certification of the 2018 LRDP. These facilities include Fire Station Number 50, which has been operational since December 2020, and Fire Station Number 52, which became operational in October 2024. The analysis below is based on updated response times for fire protection services within the vicinity of campus.

Impact Analysis

Implementation of the Update to the 2018 LRDP would result in the construction of 8.3 million GSF of net new development on-campus, including 12,780 net new resident housing beds, and serving a campus population of 96,300 (an increase of 30,700 persons compared to the total campus population of 65,600 at buildout evaluated for the 2018 LRDP) through horizon year 2040. Campus population growth could also affect fire protection facilities off campus where commuting students, faculty and staff would reside in other established communities throughout the City. Despite this growth, the proposed Update to the 2018 LRDP would not be expected to directly increase demand to a level that would require new facilities or substantial alterations to existing facilities. The addition of Fire Station 52 provides additional support for campus growth under the Update to the 2018 LRDP and Fire Station 50 has been sized to accommodate future expansion of an existing bay to accommodate future demand.

Furthermore, the Campus Fire Marshal currently reviews and approves all development plans to ensure adequate fire access and fire prevention measures are implemented for each new project in accordance with current California building and fire codes. In addition, consistent with the California Health and Safety Code, UC San Diego would equip all new on-campus academic,

residential, medical, research, and support facilities with emergency fire sprinkler systems and would continue to retrofit older existing buildings with fire sprinklers, as necessary. The campus would also continue to implement the UC San Diego Emergency Operations & Incident Management Plan, which addresses emergency access and emergency response procedures on the campus. The Campus Fire Marshal and their staff would also continue to implement campus-wide fire prevention programs. These actions, mandated by state law, would limit the number of incidents requiring the SDFR to respond to on-campus calls, thus further minimizing additional demand for fire protection services.

Implementation of the Update to the 2018 LRDP would incrementally increase demand but not directly necessitate the construction of a new fire station, nor would it result in substantial adverse physical impacts beyond those already analyzed in the 2018 LRDP EIR.

Level of Significance Before Mitigation

Impacts would be less than significant before mitigation, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

3.9.3.2 ISSUE 2 — POLICE PROTECTION FACILITIES

Public Services Issue 2 Summary

Would implementation of the Update to the 2018 LRDP result in substantial adverse physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

Section 3.12.3.2 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities. The analysis determined that although implementation of the 2018 LRDP could result in some increases in response times for police services, it would not require the construction of new public service facilities or substantial alteration of existing facilities related to police services and associated adverse physical impacts would not occur. Therefore, the impact was determined to be less than significant, and no mitigation measures were required.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes increases in population that could increase the need for public services that would require new or altered police protection facilities in the campus vicinity.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to circumstances under which the Update to the 2018 LRDP would be undertaken, and no substantial new information regarding police protection facilities has been identified since the certification of the 2018 LRDP EIR.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if demand for police capacity would result in substantial adverse physical impacts associated with the need or provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for police protection.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The following section has been modified to reflect updates to UC San Diego Police Department response times, City of San Diego response time standards, and criminal activity trends and statistics on campus.

Impact Analysis

Under the proposed Update to the 2018 LRDP, the UC San Diego Police Department would continue to have primary jurisdiction over all UC San Diego-administered properties and would have enforcement capabilities in a one-mile radius surrounding the campus. Implementation of the Update to the 2018 LRDP would result in the construction of 8.3 million GSF of net new development on-campus, including 12,780 net new resident housing beds, and serving a campus population of 96,300 (an increase of 30,700 persons compared to the total campus population of 65,600 evaluated for the 2018 LRDP at buildout) through horizon year 2040. Campus population growth could also affect police protection facilities off campus where commuting students, faculty, and staff would reside. Increases in campus population and activities associated with the implementation of the Update to the 2018 LRDP could result in an increased demand for police services on the campus.

Based on five years of data provided in the UC Police Department Annual Report and Crime Statistics for UC San Diego (University of California 2016) and review of the 2023 *UC San Diego Annual Security & Fire Safety Report* (UC San Diego 2023), there has been an increase in crime since preparation of the 2018 LRDP EIR. As stated in Section 3.9.1.2 above, this increase is attributed to more frequent electric scooter/bicycle theft in recent years, while rates of other types of crimes have remained relatively stable. The UC San Diego Police Department evaluates the need for new officers and adds new hires as necessary due to campus population increase. This would continue through the implementation of the Update to the 2018 LRDP to ensure that adequate levels of on-campus police services are provided. The existing Campus Services Complex that was constructed in 1991 was cited in the 2018 LRDP EIR to be able to accommodate anticipated future growth of the UC San Diego Police Department. Currently, building renovations and/or space consolidation are anticipated to accommodate an increase in staffing needed to accommodate growth anticipated under the Update to the 2018 LRDP (Horwat 2025).

As stated in Section 3.9.1.2, the average response time for the UC San Diego Police Department in 2015-2016 was 9 minutes and 43 seconds. Response times have improved substantially, with response times during the 2023-2024 Academic Year averaging 7 minutes and 18 seconds. This meets the City of San Diego standards for Priority 1 Call response times and there are no current plans for additional police substations in the project area. The UC San Diego Police Department has primary jurisdiction on campus and handles most incidents independently, while the SDPD

primarily responds on rare occasions to major emergencies or assists in cases requiring additional support. The City employs a number of strategies to manage demand for additional police services, including adjusting staffing needs and leveraging technology and partnerships with other local law enforcement agencies to share resources and personnel during peak times and emergencies. While the Update to the 2018 LRDP may result in some increases in demand and response times for police services, it is not anticipated to require the construction of new police protection facilities due to the overall low demand for SDPD services.

As described in Section 3.8.3.1, current regional population growth projections would result in a smaller increase than what was projected during preparation of the 2018 LRDP. UC San Diego's projected population growth numbers include future students, staff, and faculty who already reside in the region, which are already factored into existing demand for police services. The Update to the 2018 LRDP would provide an additional 12,780 beds to help accommodate the housing needs for 65 percent of the projected future student population, which would be largely served by the UC San Diego Police Department, as described above. Students, faculty, and staff that do not live on campus reside throughout the County, thus incrementally increasing demand within different police service areas. There are currently 12 SDPD facilities in the City and three new facility projects planned in its Fiscal Year 2024-2028 Five-Year Capital Infrastructure Planning Outlook (City 2023). The increase in off-campus population associated with the Update to the 2018 LRDP within the various jurisdictions where students, faculty, or staff would reside would not be concentrated in any one service area, thus the impact on any one division would be minor. Although actual police protection needs and potential locations would be determined in the future as development occurs, if new facilities are needed in the future as a result of Countywide growth, such facilities would undergo their own environmental review pursuant to CEQA when details about the project are known. In general, compliance with federal, state, and local regulations would preclude incremental impacts associated with new construction of, or improvements to, facilities infrastructure. Therefore, implementation of the Update to the 2018 LRDP would not directly result in the need for additional new police protection facilities or substantial alterations to existing facilities.

Level of Significance Before Mitigation

Impacts to police protection facilities would be less than significant before mitigation, consistent with the conclusion in the LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts to police protection facilities would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

3.9.3.3 ISSUE 3 — PUBLIC SCHOOLS FACILITIES

Public Services Issue 3 Summary

Would implementation of the Update to the 2018 LRDP result in substantial adverse physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

Section 3.12.3.3 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP would not result in substantial adverse physical impacts associated with the provision of new or physically altered public school facilities or need for new or physically altered public school facilities, the construction of which could cause significant environmental impacts, in order to maintain performance objectives for public schools. These conclusions were based on input from SDUSD at the time the 2018 LRDP EIR was prepared, which concluded that existing and planned facilities would be able to accommodate school-aged students expected to be generated by growth under the 2018 LRDP through redistricting (Hudson 2018). The impact would be less than significant, and no mitigation measures were required.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes increases in population that could increase the need for public services such as public school facilities in the campus vicinity.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Regional and local population projections have changed since the 2018 LRDP EIR; the San Diego region anticipates slower population growth and a smaller total population than was predicted in

the 2018 LRDP EIR. As a result, UC San Diego's proportional contributions to an increase in school-aged children and demand for schools may have changed, warranting a reanalysis of the project's impacts.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if demand for school capacity would result in substantial adverse physical impacts associated with the need or provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for public schools.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

This analysis contains information provided in coordination with the IFPD at SDUSD, which provided a letter dated August 6, 2024, summarizing its review of the proposed Update to the 2018 LRDP and estimation of school-aged children (TK through 12th grade) that would potentially be generated under the Update. The focus of the following analysis is based on students generated from on-campus housing. Students generated off-campus from growth under the Update to the 2018 LRDP would be dispersed throughout the City of San Diego as well as other San Diego County communities. SDUSD utilized housing projections provided by UC San Diego for the buildout of the 2018 LRDP and proposed Update to the 2018 LRDP to calculate the estimate number of students that would attend SDUSD schools at the 2040 horizon year. UC San Diego's Graduate and Family Housing and Staff and Faculty Housing facilities are the only on-campus housing facility that would house families with school-aged children. Therefore, SDUSD student generation rates are based on the number of SDUSD students who resided in these facilities during the 2023-24 school year, and were increased according to the projected growth in UC San Diego Graduate and Family Housing and Staff and Faculty Housing facilities to create a 2040 projection. Student generation rates for faculty and staff housing are based on SDUSD students who resided in La Jolla Del Sol faculty and staff housing project in the 2023-24 school year. Generation rates are provided below in Table 3.9-3, *SDUSD Student Generation Projections Under the Update to the 2018 LRDP*.

Table 3.9-3
SDUSD Student Generation Projections Under the Update to the 2018 LRDP

Grades	Graduate and Family Housing		Faculty and Staff Housing		Total Students Generated
	Student (Percent)	Student Generation (Estimated Total)	Student Generation Rate (Percent)	Student Generation (Estimated Total)	
TK-5*	1.58	80	1.06	37	117
6-8	0.29	15	0.29	10	25
9-12	0.19	10	0.46	16	26
TK-12*	**2.06**	**105**	**1.83**	**63**	**168**

Source: SDUSD 2024.
Notes:
*TK may experience an increase in enrollment upon full implementation.

Impact Analysis

Implementation of the proposed Update to the 2018 LRDP would result in an increase in the UC San Diego campus population, including students, faculty, and staff. Some of the new students, faculty, and staff would live on campus and have school-age children, which would create additional demand for local public school capacity.

Based on coordination and input from the IFPD at SDUSD for the 2018 LRDP EIR, it was anticipated that 1,280 children (infant to high school) would live on campus in the 2035 horizon year. This represented an increase of approximately 860 children by 2035 over 2015-2016 levels, almost half (450) of which would be less than five years of age, and therefore would not require public school services. When compared to the total number of students enrolled in the SDUSD educational system as of 2015-16 (130,324 students), the number of school-aged children residing on campus that were expected to result from full implementation of the 2018 LRDP was 507 children.

Comparatively, as shown in Table 3.9-3, the Update to the 2018 LRDP, combined with the 2018 LRDP buildout, was estimated to result in an increase of 168 students from the 185 students currently (as of 2023) enrolled at SDUSD schools at the 2040 horizon year buildout. This is a substantially smaller number of students compared to what was estimated for the 2018 LRDP. Although the increase in students under the Update is expected to almost double the population of SDUSD students living on the UC San Diego La Jolla campus as of the 2023-24 school year, SDUSD indicates that the current facilities could physically accommodate this number of additional students (168), assuming the student-aged population in the surrounding University area remains stable through 2040 (Oviatt 2024). For school-aged students that would reside off campus, the demand for school facilities is expected to be dispersed throughout the City of San Diego and other San Diego County communities. Students, faculty, and staff that are homeowners would pay property taxes, a portion of which goes toward funding of local K-12 public schools. Therefore, impacts related to schools would be less than significant. Therefore, new or expanded school facilities would not result directly from the projected UC San Diego growth and impacts would be less than significant. The cumulative condition including growth in the surrounding area projected by the University City Community Plan Update is addressed below in Section 3.9.4.

Level of Significance Before Mitigation

Impacts to schools would be less than significant before mitigation, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are anticipated for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

3.9.4 CUMULATIVE IMPACTS AND MITIGATION

Public Services Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative public services impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Potential adverse physical impacts from new fire protection facilities.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Potential adverse physical impacts from new police protection facilities.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Potential adverse physical impacts from new school facilities.	Less than significant.	Not cumulatively considerable.	Potentially significant.	Cumulatively considerable, even with PS-1.

As described in Section 3.8.3.1, current regional population growth projections would result in a smaller increase than what was projected during preparation of the 2018 LRDP. UC San Diego's projected population growth numbers include future students, staff, and faculty who already reside in the region, which are already factored into existing demand for public services. Overall, given the projected decreases in City and regional population growth from that analyzed in the 2018 LRDP EIR, the cumulative impact on all public services would be less than disclosed and analyzed in the 2018 LRDP EIR. Analysis of fire protection, police protection, and school facilities is provided below.

Fire Protection Facilities

The geographic context for the cumulative analysis of fire protection facilities is the City of San Diego. This geographic context was selected because, as explained above, UC San Diego does not have its own fire department and therefore relies on the City's SDFR to respond to all applicable emergencies. As described in Section 3.9.1.1 above, the 2018 LRDP EIR stated that with the provision of two additional fire protection facilities, Fire Station 52 and Fire Station 50, the entire community and campus would be adequately served by the SDFR. Section 3.12.4 of the 2018 LRDP EIR concluded that impacts to fire protection facilities would be less than significant and the LRDP

contribution would not be cumulatively considerable. Implementation of the Update to the 2018 LRDP may result in a slight increase in occurrences that require fire protection services due to an increase in on-campus development; however, the existing SDFR facilities have been sized to address service gaps anticipated with regional growth, which is expected to decrease compared to what was evaluated in the 2018 LRDP EIR. Therefore, the existing fire facilities would be adequate to serve the increased campus population, and implementation of the Update to the 2018 LRDP would not have a cumulatively considerable contribution to adverse physical impacts from the construction of new fire protection facilities or substantial alterations to existing fire protection facilities, consistent with the conclusion in the 2018 LRDP EIR.

Police Protection Facilities

The geographic context for the analysis of cumulative demand for police service and facilities is the City of San Diego, which is the same context used for the 2018 LRDP EIR. This geographic context was selected because although the campus largely relies on UC San Diego Police Department for police protection and enforcement within and immediately surrounding the campus, anticipated growth and development within the surrounding communities could result in increased demand for SDPD services. As discussed in Section 3.9.1.2 above, UC San Diego provides its own police services for the UC San Diego campus and rarely requires assistance from the SDPD. Section 3.12.4 of the 2018 LRDP EIR concluded that impacts to police protection facilities would be less than significant and the LRDP contribution would not be cumulatively considerable. There are currently 12 SDPD facilities in the City and three new facility projects planned in its Fiscal Year 2024-2028 Five-Year Capital Infrastructure Planning Outlook (City 2023). While implementation of the Update to the 2018 LRDP may result in a slight increase in occurrences that require assistance from the City of San Diego due to an increase in on-campus development at buildout, compared to the 2018 LRDP at buildout, the existing campus police facilities would be adequate to serve the increased campus population, so it is not likely that SDPD facility expansions would be required as a result of the proposed changes under the Update to the 2018 LRDP. Additionally, regional growth is expected to decrease compared to what was evaluated in the 2018 LRDP EIR, resulting in reduced overall demand for police protection services compared to what was evaluated in the 2018 LRDP EIR. Therefore, implementation of the Update to the 2018 LRDP would not have a cumulatively considerable contribution to adverse physical impacts from the construction of new police facilities or substantial alterations to existing police facilities, consistent with the conclusion in the 2018 LRDP EIR.

School Facilities

The geographic context for cumulative effects associated with demand for school facilities is the San Diego region, specifically the service area of SDUSD that serves the La Jolla and University City communities surrounding the campus. Section 3.12.4 of the 2018 LRDP EIR concluded that impacts to school facilities would be less than significant and the LRDP contribution would not be cumulatively considerable. Growth within the San Diego region would contribute more school-aged children that would enroll in the public school system managed by SDUSD. As noted in Section 3.9.1.3, SDUSD has four bond measures that are used to fund repairs, renovations and revitalizations of existing schools within SDUSD. These upgraded school facilities would contribute to the provision of facilities to serve regional growth in San Diego. SDUSD would conduct an environmental review of all new school facilities required to accommodate regional growth within their district. Compliance with federal, state and local regulations would be required prior to the construction of the new facilities. SDUSD indicates that although the current facilities could

physically accommodate the projected number of additional students under the Update to the 2018 LRDP at the 2040 horizon year if the student-aged population in the surrounding University area were to remain stable, when the increase of 168 students is considered in conjunction with the student population projected in the recently updated University City Community Plan, SDUSD determined that the existing facilities would likely need to be expanded to accommodate the cumulative population increases planned in Northern University City (Oviatt 2024). This is particularly applicable at the elementary level, as children in grades TK through 5 make up a majority of the students likely to be generated by the 2018 LRDP and Update to the 2018 LRDP (117 students) and the elementary schools that would serve these students, and others in the area, currently offer minimal excess capacity. Therefore, implementation of the Update to the 2018 LRDP would likely contribute to the need for construction of new or expanded facilities at the elementary level. Compared to what was evaluated in the 2018 LRDP, although the overall increase in students at the 2040 horizon buildout is substantially lower than the 2035 horizon projections, the currently considered cumulative impacts are reflective of changes now planned for the neighborhoods surrounding the campus as disclosed in the Blueprint SD PEIR for the University City Community Plan that was finalized in 2024 (City 2024b). As noted in Blueprint SD PEIR Section 4.12.4 under "Schools," the University Community Plan Update buildout is expected to add approximately 30,480 multi-family dwelling units, with no change anticipated for single-family dwelling units in the University Community Plan Update area (City of San Diego 2024b). SDUSD estimated that the increase in housing would generate approximately 1,576 TK through 5th grade students, 546 6th through 8th grade students, and 667 9th through 12th grade students (City of San Diego 2024b). While the payment of fees would provide funding for SDUSD to address future school capacity needs, the potential increase in students from implementation of the University Community Plan Update could impact the capacity of existing schools and could require the construction of new school facilities. Therefore, when considered with the potential impacts of other development within the study area, the proposed Update could result in a cumulatively considerable contribution to the impact to school facilities.

Given the number of estimated students, faculty, and staff with school-aged children expected to be living on campus by 2040, UC San Diego will continue to collaborate and consult with SDUSD as plans for new UC San Diego buildings and facilities arise through the ongoing implementation of the Update to the 2018 LRDP. With regards to collaboration, UC San Diego's Center for Research on Educational Equity, Assessment & Teaching Excellence (CREATE) is an equity-focused, community-facing research-practice-partnership center committed to supporting equitable educational opportunities for San Diego's K-12 students. CREATE supports hundreds of schools across the region through programming and ongoing systemic partnerships with the region's major school districts, including the San Diego Unified School District. UC San Diego would also continue to regularly participate in community meetings and conduct outreach regarding upcoming projects to ensure issues of potential neighborhood concern are made known and considered during the planning process of future development. In addition to these standard procedures that will be continued as implemented under the 2018 LRDP, a new mitigation measure PS-1 has been identified to address the Update's potential to result in a cumulatively considerable contribution to a significant cumulative impact to schools.

PS-1 **Consultation with the SDUSD**. UC San Diego will collaborate and consult with the San Diego Unified School District (SDUSD) and provide campus faculty/staff and graduate housing updates to SDUSD for the purpose of facilitating enrollment projections and facility planning to account for UC San Diego-related population changes as a result of implementation of the Update to the 2018 LRDP. These housing updates will be provided throughout the ongoing implementation of the 2018 LRDP and Update to the 2018 LRDP as

facilities that may house families with school-aged children that could potentially attend SDUSD are proposed. Specifically, the University will consult with SDUSD in writing no later than when project documentation is submitted to the UC Regents at the Preliminary Plans approval phase of a project, which aligns with early project programming and conceptual design, to project the estimated number of school-aged students generated related to UC San Diego's project so that these students can be incorporated into SDUSD's projections.

Additional enrollment from implementation of the Update to the 2018 LRDP along with future cumulative projects could result in the need for new and/or expanded public school facilities. If determined by SDUSD to be required to accommodate future growth, including limited UC San Diego-induced growth, future SDUSD school projects would be subject to project-specific environmental review, during which environmental impacts would be identified and addressed by SDUSD. SDUSD would be responsible for expanding existing schools or developing new school facilities. At the present time, no new or expanded school facilities that could serve school-aged students living on the UC San Diego campus due to the Update to the 2018 LRDP implementation are currently planned and the location and future need for these potential schools cannot be determined at this time (Oviatt 2024). While compliance with the existing regulations and additional project-specific mitigation measures for future projects would serve to reduce potential environmental impacts associated with the development of potential school facilities, impacts associated with the construction and operation of such facilities would remain significant as the specific impacts and extent of these impacts are not known at this time. Although the direct impact of the proposed Update on school facilities is below a level of significance due to the limited number of school-aged students anticipated to be generated, when considered in conjunction with other reasonably foreseeable development in the area, the cumulative increase in student enrollment could exceed the capacity of SDUSD school facilities. Therefore, impacts to school facilities would be cumulatively considerable, and significant and unavoidable, even with implementation of mitigation measure PS-1.

3.9.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under public services are evaluated above. There are no CEQA issues where there is no potential for a significant effect.

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3.10 TRANSPORTATION AND CIRCULATION

This section describes the existing traffic and circulation conditions on the UC San Diego campus and surrounding areas. It also identifies applicable plans, policies, and regulations related to transportation, including alternative transportation. This section then evaluates whether new or substantially more severe environmental impacts related to transportation would result from the proposed Update to the 2018 LRDP compared to those identified in Section 3.14 of the 2018 LRDP EIR.

The analysis in this section of the SEIR evaluates potential transportation impacts with respect to VMT in accordance with SB 743. Potential changes related to transportation plan conflicts, hazardous design features, and emergency access are also addressed in this section. Analysis in this section related to VMT is based on the VMT Assessment prepared by LLG (LLG 2025a), which is included as Appendix H of this SEIR.

3.10.1 ENVIRONMENTAL SETTING

The existing transportation network within UC San Diego and the surrounding area is described in detail in Section 3.14.1 of the 2018 LRDP EIR. The UC San Diego transportation network and programs are described below in terms of changes compared to the conditions disclosed in the 2018 LRDP EIR.

3.10.1.1 EXISTING MODES OF TRAVEL IN UC SAN DIEGO VICINITY

Regional Highway and Roadway Network

The existing regional highway and roadway network are described in detail in Section 3.14.1.1 of the 2018 LRDP EIR. As described in the 2018 LRDP EIR, the campus is generally bound by Genesee Avenue to the north and west, La Jolla Village Drive to the south, North Torrey Pines Road to the west, and Regents Road to the east. West and East Campus are separated by I-5 but connected by two vehicular bridges, one on Voigt Drive and one at Gilman Drive, which cross over I-5. SIO is accessible via La Jolla Shores Drive and Expedition Way. These roadways generally remain in the configuration described in the 2018 LRDP EIR. La Jolla Shores Drive is maintained and improved, as needed, by the City of San Diego in accordance with applicable mobility plans.

Transit Network

The majority of the campus is located within a TPA, defined by PRC Section 21064.3 as a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (City of San Diego 2022). See Figure 3.1-1 for an overlay of TPAs within the UC San Diego campus and surrounding areas.

Public transit within and near the campus continues to be provided by bus, light rail, and heavy rail services operated by MTS and NCTD. Specifically, MTS operates Rapid bus and Trolley services, and NCTD operates BREEZE bus, FLEX on-demand transit service, and COASTER heavy rail services. UC

San Diego also operates shuttle service within campus and to select off-campus locations. Notable changes to transit services from those described in the 2018 LRDP EIR are summarized below.

In addition to the specific service enhancements described below, Adaptive Traffic Signal Controls and Transit Priority Signal Controls are being installed along road segments in the vicinity of UC San Diego (Regents Road, La Jolla Village Drive, and North Torrey Pines Road) to help enhance traffic flow and prioritize bus headways. These controls, in addition to bicycle and pedestrian improvements throughout these roadways, were funded and implemented by UC San Diego as part of implementation of 2018 LRDP EIR mitigation measure Tra-1A-OPT2. Once the permitting and inspection process with the City of San Diego is completed in spring 2025, the infrastructure and improvements will be installed/constructed (anticipated completion in fall 2025), with the system being owned and operated by the City of San Diego.

MTS Bus: With the opening of Trolley services, described below, Express Routes 50 and 150, which provided service to downtown San Diego, have been eliminated (MTS 2023). Although these routes have been eliminated, the addition of Trolley services has enhanced transit service to downtown San Diego. The existing MTS bus routes that provide access to and in the vicinity of the campus include the following routes: 30, 31, 41, 60, 101, 105, 201, 202, 204, and 237 (MTS 2023).

MTS Trolley: At the time the 2018 LRDP EIR was certified, no Trolley service was available from campus. An extension of the UC San Diego Blue Line Trolley extension was under construction at the time to connect downtown San Diego to the University City Community. This construction was completed in November 2021 and Trolley service is available from two stations on the UC San Diego campus, one within West Campus and one within East Campus (MTS 2023).

NCTD BREEZE: The NCTD BREEZE Bus Route 101 continues to provide service from Oceanside to University City via Highway 101 (NCTD 2024a). No NCTD BREEZE routes have been established or removed from campus since certification of the 2018 LRDP EIR.

NCTD FLEX: The NCTD FLEX is a public transit service offered by NCTD that provides passengers with flexible service routes. The two service models offered under the FLEX program include the FLEX deviated fixed-route service, which has a set schedule and route but can deviate from the route up to a certain distance to pick-up or drop-off customers; and the FLEX point-deviated fixed-route, which has a set schedule and can deviate to certain points along the route. The service requires reservations for trips not starting or ending at a designated stop. FLEX bus routes which provide access to and in the vicinity of campus include 479, 921, 921A, and 985 (NCTD 2024a).

NCTD COASTER: Effective June 9, 2024, MTS discontinued a partnership with NCTD to provide connections to the NCTD Sorrento Valley COASTER station. This service change eliminated Route 974, which connected to the UC San Diego campus, as well as Routes 972, 973, 978, and 979, which provided service from the Sorrento Valley COASTER station to areas surrounding the campus (MTS 2024). In place of these services, NCTD began providing service to campus via FLEX Route 479, which operates a connection approximately equivalent to the prior Route 974 during weekday, peak commute hours (NCTD 2024b).

UC San Diego Shuttle Service: UC San Diego continues to offer students, faculty, and staff free shuttles that serve campus, medical centers, and key off-campus locations; however, some of these routes have changed since certification of the 2018 LRDP EIR. There are currently seven shuttle routes provided: Health Campus Connector, Regents Express, SIO Shuttle, Inside Loop, Outside

Loop, Mesa South Shuttle, and Grocery Shuttle – Clairemont/Convoy (UC San Diego 2024a). Some of these routes operate with reduced or suspended service during academic breaks and summer.

Bicycle Network

Class I Bike Paths, Class II Bike Lanes, and Class III Bike Routes along with permitted freeway shoulder access and "sharrow" (shared-lane) pavement markings continue to be provided in the campus vicinity. Within campus, bike routes are provided throughout West and East Campus, as well as connections to SIO (UC San Diego 2024b). Since the preparation of the 2018 LRDP EIR, at least four miles of bike routes have been added, or are in the process of being constructed, to enhance connections outside of the campus boundaries, including portions of the regional Coastal Rail Trail connecting campus to Sorrento Valley to the northeast and extending south along Gilman Drive. The Gilman Bridge that was under construction at the time the 2018 LRDP EIR was prepared is now complete and provides a bicycle and pedestrian connection between West and East Campus over I-5. In addition, the Mesa Pedestrian and Bike Bridge, which connects the Mesa Housing developments with the Health Science campus facilities on the north side of Central Canyon, was constructed in 2020. Bicycle parking is provided throughout campus, including cages at the Gilman Parking Structure, South Parking Structure, Bike Barn at the Central Campus Blue Line station, and Torrey Pines Center South Parking Garage. New residential areas that have been developed since the 2018 LRDP EIR was prepared have incorporated additional bicycle parking and connections to bike paths consistent with the 2018 LRDP goals.

Pedestrian Network

Development projects on campus that have occurred since preparation of the 2018 LRDP EIR have incorporated pedestrian-oriented features, including areas with limited vehicular access, consistent with the goals of the 2018 LRDP. There continues to be a robust network of pedestrian features within and surrounding campus, including a mixture of sidewalks, pathways, plazas, and public spaces. As described above, Gilman Bridge now provides a pedestrian connection across I-5, improving the connection between West Campus and East Campus for pedestrians. The Mesa Pedestrian and Bike Bridge now provides a connection across Central Canyon connecting the West Campus with the Mesa Student Housing neighborhood. Other improvements that are currently under construction include a pedestrian corridor along portions of the East Campus Loop Road and improved pedestrian connectivity to new campus buildings such as the Triton Center and new Living Learning Neighborhoods. Overall, these pedestrian improvements have enhanced pedestrian safety and circulation options throughout campus and provided connections to the nearby community.

3.10.1.2 UC SAN DIEGO ALTERNATIVE TRANSPORTATION PROGRAMS

UC San Diego's Transportation Services Department continues to implement its comprehensive TDM program described in further detail in Section 3.14.1.2 of the 2018 LRDP EIR. It is noted that the TDM program described here and in the 2018 LRDP EIR consists of formal programs and policies that aim to decrease SOV use but does not address all factors that contribute to commute modes, such as providing on-campus housing.

A current analysis of trips made to and from campus by the campus population via all modes of transportation including SOV, carpool, transit, biking, walking, and other modes, which accounts for remote workers and on-campus student residents was prepared by LLG (LLG 2025b; attached as

Appendix B2 of this SEIR). The data show that the majority of trips are not made by SOV, and that the TDM program continues to be an effective program for reducing SOV use to and from UC San Diego (LLG 2025b). The UC San Diego TDM program addresses Commuting/Alternative Transportation, Campus Mobility, Shuttle Service, Parking Policies, and Resources and Services. No major changes to the Campus Mobility, Parking Policies, or Resources and Services components of the TDM program described in the 2018 LRDP EIR have occurred. As it relates to Campus Mobility Programs, UC San Diego continues to maintain online resources related to transportation programs as well as provide Triton Mobility Services and Safety Escorts. The use of parking spaces continues to require a paid permit or payment for a pass, thereby discouraging SOV use. Further, permits are not available for undergraduate, on-campus residents (barring extenuating circumstances). A change in shuttle routes has occurred but is described above. Updates to the Commuting/ Alternative Transportation portion of the TDM program are described below.

Commuting/Alternative Transportation

Public Transit Incentive Programs

The U-Pass continues to allow students unlimited access to public transit services (MTS and NCTD bus and Trolley routes) as part of their registration fees for fall, winter, and spring quarters. There is also now a summer version of the U-Pass available for students at a discounted rate. The FaSt Pass program also continues to allow faculty and staff to enroll in pre-tax commuter benefits and receive fare discounts for access to regular MTS and NCTD buses. Beginning in August 2022, the VC-50 for Transit pilot program covers 50 percent of transit pass costs for UC San Diego faculty and staff (UC San Diego 2024c).

Cycling Programs

In place of Pedal Club incentives described in the 2018 LRDP EIR, campus populations may participate in the Triton Commuter Club, which recognizes and incentivizes actions that reduce driving via methods other than cycling, including walking or public transit use (UC San Diego 2024d). A shared electronic scooter program has also replaced the bikeshare program described in the 2018 LRDP EIR but provides similar benefits for campus populations to use shared means of alternative transportation (UC San Diego 2024e). There are currently over 7,000 bike parking locations on campus, and bike commuter program participants have access to free showers and lockers. The bicycle safety program also provides $10 bike helmet vouchers for purchases at the campus bike shop.

Ridesharing

The Lyft FLEX, Zimride, and iCommute programs described in the 2018 LRDP EIR are no longer in service. However, UC San Diego continues to provide registered carpool/vanpool groups with reserved carpool parking and allows permitless parking for Zipcars, which are offered at a discounted membership rate. The trip generation analysis prepared for this SEIR demonstrates the continued success of carpooling (19 percent of campus trips) for commuting to campus (LLG 2025b). In addition, the Emergency Ride Home pilot program offers ridesharing credit in the event of unexpected commute changes, similar to SANDAG's Guaranteed Ride Home program described in the 2018 LRDP EIR (UC San Diego 2024f).

Flexible Work Arrangements

UC San Diego offered flexible work arrangements prior to the COVID-19 pandemic, including alternative work hour, compressed work week, and telecommuting schedules. Since returning to campus following the lifting of COVID-19 pandemic restrictions, an increased number of staff and faculty are able to work remotely from alternative locations (e.g., from home) for all or portions of their work schedules, thereby decreasing commute trips to and from campus compared to those described and analyzed in 2018 EIR (UC San Diego 2024g). According to the mode split data collected by UC San Diego, approximately 18 percent of the campus population reported working remotely, thereby reducing associated worker commute trips to campus (LLG 2025b).

3.10.2 REGULATORY FRAMEWORK

Transportation and traffic on and around the UC San Diego campus are guided by plans and policies developed by the federal government, State of California, and regional/local transportation programs. While many of the UC San Diego TDM programs and policies described above (i.e., parking policies, transit incentives, etc.) influence the modes of transportation used in campus-related commutes, these are not codified regulations for transportation facilities or commutes to campus. Regulations that pertain to the proposed Update to the 2018 LRDP and have been updated from those described in the 2018 LRDP EIR are described below.

3.10.2.1 FEDERAL

Americans with Disabilities Act of 1990

No substantial change to the ADA with respect to the requirement to provide for physical access has occurred since the description provided in the 2018 LRDP EIR. The requirement for places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with the accessibility standards established by ADA Title III Regulation 28 CFR Part 36 remains applicable to UC San Diego. The UC San Diego Disability Access Guidelines described in the 2018 LRDP EIR were updated in 2022 to identify appropriate contacts and policies for facility access problem resolution (UC San Diego 2022).

On April 24, 2024, the Federal Register published the Department of Justice's final rule updating its regulations for Title II of the ADA to include specific requirements to ensure that web content and mobile applications provided by public agencies are accessible to people with disabilities. UC San Diego will be required to update web content and mobile applications provided for transportation services in accordance with the updated ADA rule; however, this update would not result in physical environmental changes.

3.10.2.2 STATE

Senate Bill 743

As described in the 2018 LRDP EIR, SB 743 was signed on September 27, 2013, and changed the way that transportation impacts are analyzed under CEQA by replacing the level of service (LOS) metric with VMT. Therefore, a project's effect on LOS or automobile delay no longer constitutes a significant environmental impact under CEQA. Subsequently, the Governor's Office of Land Use and

Climate Innovation (LCI)[1] amended the CEQA Guidelines to address VMT and developed the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory; LCI 2018). The Technical Advisory was finalized in December 2018 and includes recommendations for assessment of VMT impacts, thresholds of significance, and mitigation measures. A draft version of the Technical Advisory had been released in January 2016 and was utilized in preparation of the 2018 LRDP EIR, which addressed VMT impacts voluntarily, though the revised CEQA Guidelines did not require compliance until July 1, 2020.

California Environmental Quality Act Guidelines

In 2019, the CEQA Guidelines were updated within the Transportation section of Appendix G. The previous threshold of significance question addressing LOS standards was replaced with a question pertaining to VMT impacts in accordance with SB 743. In addition, two questions pertaining to conflicts with circulation and alternative transportation plans and policies were consolidated. Lastly, a question related to air traffic patterns was removed from the Transportation section.

3.10.2.3 REGIONAL

Regional Transportation Plans and Programs

SANDAG serves as the forum for decision-making on regional issues such as growth, transportation, land use, the economy, the environment, and criminal justice. SANDAG builds consensus, makes strategic plans, obtains and allocates resources, and provides information on a broad range of topics pertinent to the region's quality of life. SANDAG is governed by a Board of Directors composed of mayors, council members, and supervisors from each of the San Diego region's 19 local governments. While UC San Diego is not a local government that falls under the umbrella of SANDAG's decision-making processes, the regional transportation and growth planning affect transportation services in the campus vicinity.

The 2018 LRDP EIR provided an overview of the 2015 Regional Plan, 2018 State Transportation Improvement Program, and 2016 Regional Transportation Improvement Program (RTIP). The most relevant plan to the Update to the 2018 LRDP SEIR is the Regional Plan, which has been updated since preparation of the 2018 LRDP EIR and is described below. This plan identifies current transportation plans and policies in the San Diego area but does not directly regulate campus development. In addition, SANDAG has adopted the 2025 RTIP since preparation of the 2018 LRDP SEIR, which updates the previously analyzed 2016 RTIP and is further described below.

San Diego Forward: The 2021 Regional Plan

The SANDAG 2021 Regional Plan is a joint RTP and SCS developed to address the transportation and mobility challenges in San Diego County, including safety and traffic congestion, social inequities, and State and federal requirements to reduce GHG emissions and air pollution. The 2021 Regional Plan details how policies and investments in the transportation system, including infrastructure investments, technological advances, programs, and services, can work together to meet the needs of the San Diego region through 2050 (SANDAG 2021). There are "5 Big Moves" identified in the 2021 Regional Plan, including use of complete corridors; a transit leap to provide a network of high-capacity, high-speed, and high-frequency transit service; mobility hubs where high

[1] Effective July 1, 2024, the Governor's Office of Planning and Research was renamed the Governor's Office of Land Use and Climate Innovation (LCI).

concentrations of people, destinations, and travel choices converge; flexible fleets to provide a variety of on-demand shared vehicles including micro transit, bikeshare, scooters, and other modes of transportation that connect to transit; and "Next Operating System", a digital platform that ties the transportation system together in real time.

UC San Diego West Campus and East Campus are identified in the 2021 Regional Plan as being located within a Mobility Hub, which are vibrant centers of activity where transit and on-demand travel options, supported by safe streets, connect people with their destinations and businesses with their customers. Mobility Hubs are also planned to accommodate future growth and development. As stated above, although UC San Diego is not subject to the 2021 Regional Plan, it is discussed due to its relevance to regional transportation and growth plans and policies.

2025 Regional Transportation Improvement Program

The SANDAG RTIP is a five-year investment plan that identifies the projects and programs proposed for investment within the San Diego region. The primary purpose of the RTIP is to incrementally implement the 2021 Regional Plan, as described above. The RTIP includes a variety of transportation projects, including major highway, arterial, transit, and non-motorized transportation initiatives. These projects aim to enhance mobility, reduce GHG emissions, and improve connectivity throughout the San Diego region The 2025 RTIP covers fiscal year 2025 through fiscal year 2029. The SANDAG Board adopted the 2025 RTIP on September 27, 2024, and the Federal Highway Administration and Federal Transit Administration approved the 2025 RTIP and its air quality determination on December 16, 2024 (SANDAG 2024).

3.10.2.4 LOCAL (NON-REGULATORY)

As previously discussed in Section 1, Introduction, of this SEIR, UC San Diego is part of the UC, a constitutionally created State educational entity, and is not subject to municipal regulations of surrounding local governments, such as the City of San Diego General Plan or land use ordinances, for uses on property owned or controlled by the UC that are in furtherance of the UC's education purposes. However, UC San Diego may consider, for coordination and/or informational purposes, aspects of local plans and policies for the communities surrounding the campus when it is appropriate and feasible, but it is not bound by those plans and policies in its planning efforts. Thus, a summary of City of San Diego plans and policies related to transportation and traffic that have been updated from those described in the 2018 LRDP EIR is provided below. No amendments to the La Jolla Community Plan have occurred; as such, no new discussion of this plan is provided.

City of San Diego General Plan

The Mobility Element of the City of San Diego General Plan has been updated from the version described in the 2018 LRDP EIR to focus on transit connections and connections between land uses and transit in the City. The overall goals of the City of San Diego General Plan Mobility Element remain similar to those described in the 2018 LRDP EIR. In summary, the overall goal is to achieve a balanced, multimodal transportation system where each mode of transportation contributes to an efficient service network that meets varied user needs. To achieve this vision, the Mobility Element provides goals to improve the City of San Diego with walkable communities, bicycle infrastructure, shared use mobility options, transit services, complete streets, intelligent transportation systems, transportation demand management programs, and other emerging transportation technologies (City of San Diego 2024a). Based on the high-level goals of the Mobility Element, individual community plans identify specific circulation networks and improvements.

City of San Diego Mobility Choices Program

To implement SB 743, the City of San Diego adopted the Mobility Choices Program in 2020 to ensure new development mitigates transportation VMT impacts to the extent feasible, while incentivizing development within the City's TPAs and urban areas (City of San Diego 2020). The Mobility Choices Program included adoption of the Mobility Choices Regulations (Chapter 14, Article 3, Division 11 of the San Diego Municipal Code) and adoption of a new CEQA significance threshold for transportation. The Mobility Choices Regulations include the identification of Mobility Zones, VMT Reduction Measures, and an Active Transportation In-Lieu Fee used to mitigate VMT impacts from new development in VMT inefficient areas by collecting funds for implementation of active transportation improvements in VMT efficient areas. Implementation of this program does not apply to campus development but may result in the construction of active transportation improvements near campus given its location in a VMT efficient area (Mobility Zone 2).

City of San Diego Mobility Master Plan

The Mobility Master Plan, adopted by the City Council on April 22, 2025, is a comprehensive transportation planning effort to create a balanced, equitable, and sustainable mobility system for the City of San Diego. The Mobility Master Plan is intended to implement projects, programs, and actions which would make walking, rolling, bicycling, and using transit more convenient, efficient, and affordable. In addition, the Mobility Master Plan advances the climate, equity, and mobility goals outlined in the City's CAP and the General Plan while identifying focus areas with the greatest mobility needs. The 2025 Mobility Master Plan is intended to be dynamic in that it will be updated every four years to align with San Diego's evolving mobility system, to capture and build upon separate plans and improvements taking place, and to take advantage of changes in technology and emerging strategies (City 2025a).

City of San Diego Bicycle Master Plan

The Bicycle Master Plan, last updated in December 2013, is a policy document meant to guide the development and maintenance of the City's bicycle network, including roadways, support facilities, and non-infrastructure programs. The Bicycle Master Plan seeks to make biking a viable travel choice (particularly for trips less than five miles) by establishing a safe and comprehensive bikeway network on both a local and regional level. The plan also addresses environmental quality, public health, recreation, and mobility benefits, while outlining specific bicycling programs, network implementation, and funding strategies (City 2025b).

The City is currently updating its Bicycle Master Plan to propose new bicycle facilities and prioritize transportation projects aligned with the City's Strategic Plan, General Plan, and Climate Action Plan. Additionally, it will place a greater emphasis on equity, focusing on areas with the highest needs (City 2025c).

University Community Plan

The University Community Plan and Local Coastal Plan was updated on July 30, 2024. The University Community Plan has been amended four times from the version described in the 2018 LRDP EIR. While this plan does not regulate campus land uses given UC San Diego's autonomy, it recognizes the connection between development surrounding campus and the 2018 LRDP. The Mobility section of the University Community Plan does not designate changes to the transportation system within the UC San Diego campus but identifies existing mobility features within the campus

and plans for roadway, public transit, bicycle, and pedestrian improvements surrounding the campus. The focus of the University Community Plan as it relates to mobility is to prioritize active transportation and multimodal travel options, providing connections between employment, institutional, residential, and other land uses in the University community (City 2024b).

3.10.3 PROJECT IMPACTS AND MITIGATION

3.10.3.1 ISSUE 1 — COMPLIANCE WITH CIRCULATION SYSTEM PROGRAMS, PLANS, ORDINANCES, OR POLICIES

Transportation and Circulation Issue 1 Summary

Would implementation of the Update to the 2018 LRDP conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

2018 LRDP EIR Significance Conclusion	Significant and unavoidable.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than the 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

Analysis related to transportation plans and policies is provided in Sections 3.14.3.1 and 3.14.3.3 of the 2018 LRDP EIR. Consistent with Appendix G of the current CEQA Guidelines described in Section 3.10.2.2, this topic for both roadways and alternative transportation systems are considered together under Issue 1. While LOS is no longer the applicable metric for identifying transportation impacts under CEQA, it was analyzed in the 2018 LRDP EIR and is therefore summarized here.

The 2018 LRDP EIR concluded that implementation of the 2018 LRDP would not result in conflicts with alternative transportation policies, plans, or programs and the impact would be less than significant. However, the 2018 LRDP EIR concluded implementation of the 2018 LRDP could result in a significant impact related to conflicts with roadway policies related to LOS deficiencies (based on City of San Diego significance thresholds). Mitigation measure Tra-1A-OPT2 was identified in the 2018 LRDP EIR to address potential LOS impacts to the roadway system. Implementation of mitigation measure Tra-1A-OPT2, including installation of adaptive traffic signal controls ("smart

signals") and pedestrian and bicycle crossing safety improvements at key roadway corridors surrounding the campus (La Jolla Village Drive, Regents Road and later expanded to include North Torrey Pines Road), would reduce impacts to the roadway system but the impact would remain significant and unavoidable.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes increases in population/density and land use changes that could increase the use of transit, roadway, bicycle, and pedestrian facilities in the campus vicinity.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Since certification of the 2018 LRDP EIR, mitigation measure Tra-1A-OPT2 has been implemented, thereby reducing the effect of trips generated by the 2018 LRDP on roadway circulation; however, as described above LOS is no longer the appropriate metric for assessing transportation impacts under CEQA. CEQA Guidelines Section 15064.3(a) has been revised to state: "Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact." As such, the standard for assessing roadway impacts in this SEIR described below is not an analysis of LOS, but an assessment of consistency with circulation plans and policies.

Standards of Significance

Based on Appendix G of the CEQA Guidelines, an impact is considered significant if a project would result in a conflict with an applicable plan or policy addressing the circulation system.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The following discussion evaluates the consistency of the proposed Update to the 2018 LRDP with respect to the current RTP/SCS (the 2021 Regional Plan), consistent with the methodology of the 2018 LRDP EIR for alternative transportation impacts. As LOS is no longer evaluated under CEQA, roadways are also evaluated for consistency with the 2021 Regional Plan in this analysis.

Impact Analysis

The proposed Update to the 2018 LRDP was evaluated for consistency with the 2021 Regional Plan as part of the VMT analysis, as detailed further under Issue 2 below and summarized here. The "5 Big Moves" identified in the 2021 Regional Plan promote the use of complete corridors; a provision of high-frequency transit service; development in mobility hubs; flexible modes of transportation that connect to transit; and a digital platform that ties the transportation system together in real time. Overall, the Update to the 2018 LRDP would be consistent with the land use planning principles of the 2021 Regional Plan, as it would focus population growth at a high density within the mixed-use campus within a TPA, providing students, staff, and faculty with housing options in close proximity to school/work as well as numerous transit options. Further discussion of the

consistency of the Update to the 2018 LRDP with the 2021 Regional Plan "5 Big Moves" is provided in the analysis of Issue 2, below.

UC San Diego provides complete streets within the campus circulation network, allowing for safe use of roadways by passenger vehicles, buses, bicycles, and pedestrians. This circulation network in combination with the Spin scooter partnership (with approximately 800 scooters available in key campus locations) and bike storage options on campus contribute to the use of flexible fleets and micro-mobility options on campus. The location of the campus with relation to MTS and NCTD transit systems, including hosting the Gilman Transit Center, UC San Diego Central Campus Trolley Station, and UC San Diego Health La Jolla Trolley Station, in combination with the campus-provided shuttle system, Triton Transit, contributes to the increased use of transit services for the region. The proposed locations for increased residential density on campus are within an identified mobility hub and such housing would be offered to students below market rate. These UC San Diego programs achieve the goals of the 2021 Regional Plan for the transportation network and the Update to the 2018 LRDP would further the smart growth and sustainable development approach from the 2018 LRDP while providing for additional housing and employment opportunities on campus. UC San Diego would continue to implement its comprehensive TDM program and incorporate the recommendations of the 2018 LRDP Transportation Impact Study, adopted as project design features to the 2018 LRDP. These design features include continuing implementation of TDM programs, expanding parking permit restrictions, implementing transit signal priority, prioritizing construction of on-campus housing, constructing bike and pedestrian connections in existing gaps, and creating or continuing opportunities for coordination with transportation agencies. Therefore, the proposed Update to the 2018 LRDP is consistent with the SANDAG 2021 Regional Plan and would not conflict with applicable programs, plans, ordinances, or policies addressing transit, roadway, bicycle, or pedestrian facilities. The Update to the 2018 LRDP also would not cause new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR.

Level of Significance Before Mitigation

As described above, impacts would be less than significant for the Update to the 2018 LRDP. This is a reduction in the level of impact compared to the 2018 LRDP EIR, as the previously significant LOS impact no longer applies under CEQA.

Mitigation Measures

Measure removed from the 2018 LRDP EIR:

The 2018 LRDP EIR measure Tra-1A-OPT2, after close coordination with the City on design review, permitting and other required approvals, is nearing its implementation phase and will be completed by fall 2025. Further, due to the change in significance standards from LOS to VMT, the potential effects of trip generation on congestion are no longer considered a traffic impact under CEQA. Therefore 2018 LRDP EIR mitigation measure Tra-1A-OPT2 from the 2018 LRDP EIR is no longer required.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

No new or revised mitigation measures are required.

Level of Significance After Mitigation

Impacts on the circulation system would remain less than significant without mitigation for the Update to the 2018 LRDP.

3.10.3.2 ISSUE 2 — INDUCE SUBSTANTIAL VEHICLE MILES TRAVELED

Transportation and Circulation Issue 2 Summary

Would implementation of the Update to the 2018 LRDP conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

Analysis of VMT impacts is contained in Section 3.14.3.2 of the 2018 LRDP EIR. The 2018 LRDP EIR concluded that implementation of the 2018 LRDP would not result in a significant VMT impact. This conclusion was based on six tiers of significance thresholds, considering the TDM program; campus proximity to transit; resident, student, employee, and overall per capita VMT of at least 15 percent below the regional average; consistency with the RTP/SCS; and availability of multi-modal transportation networks. No mitigation measures were required, though it was noted UC San Diego would continue to improve multi-modal transportation opportunities.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP proposes changes in population/density and land use designations on the UC San Diego campus that could change VMT generated from vehicular use.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Since certification of the 2018 LRDP EIR, CEQA Guidelines Section 15064.3 became applicable to all CEQA analyses; however, as the 2018 LRDP EIR incorporated an analysis of VMT impacts prior to the change to the CEQA Guidelines becoming effective, no substantial change in circumstances or information related to VMT, as it pertains to the 2018 LRDP EIR, have occurred.

Standards of Significance

An impact is considered significant if implementation of the Update to the 2018 LRDP would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). CEQA Guidelines 15064.3(b)(1) also provides the following screening standard for land use projects: "Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to have a less than significant transportation impact." A "major transit stop" is defined in PRC Section 21064.3 as a site containing "[a]n existing rail transit station,"; "[a] ferry terminal served by either a bus or rail transit service"; or "[t]he intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." A "high-quality transit corridor" is defined by PRC Section 21155(b) as "a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." Per PRC section 21155(b), the definition of a "major transit stop" also includes "major transit stops that are included in the applicable regional transportation plan."

LCI's Technical Advisory (LCI 2018) states the above-described presumption of no significant impact stated in CEQA Guidelines 15064.3(b)(1) would not apply if project-specific or location-specific information indicates that the project will still generate significant levels of VMT (Technical Advisory, at p. 14.). For example, the presumption would potentially not be appropriate if a project:

- Has a FAR of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable SCS (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The following analysis is based on the VMT Assessment prepared by LLG (2025a), which evaluates the transportation effects of the proposed Update to the LRDP based on guidance from the CEQA Guidelines and LCI's Technical Advisory. No updates to the approved 2018 LRDP development projections in SIO, which were analyzed under the 2018 LRDP EIR and associated VMT study, are

proposed. The only land use change proposed in SIO would be to expand the OSP land use designation, which does not generate vehicular trips and does not have an effect on VMT. Therefore, SIO is not a part of the VMT study area described in this analysis.

Impact Analysis

Within the VMT study area, the UC San Diego campus is located within a TPA (as defined under CEQA) per the City of San Diego's TPA interactive mapping service and is located within one-half mile of multiple major transit stops as defined by PRC Section 21064.3 (refer to Figure 3-1.1). Appendix A and Figure 3-4 of the VMT Assessment (Appendix H of this SEIR) provide a complete listing of transit stops within one-half mile of UC San Diego. It should be noted that the southwest portion of SIO is located just outside of the City's TPA (refer to Figure 3.1-1); however, this area is not within the VMT study area based on the lack of changes to trip-generating land uses or VMT. Further, it should be noted that SIO is connected to the adjacent TPA via the UC San Diego shuttle system.

As the VMT study area is located within a TPA, the presumption of no significant VMT impact pursuant to CEQA Guidelines Section 15064.3(b)(1) would apply unless one of the project-specific or location-specific factors identified in the LCI Technical Advisory indicate significant VMT would be generated. None of these project-specific circumstances are applicable to the Update to the 2018 LRDP as summarized below; therefore, the presumption of no significant traffic (VMT) impact would apply.

- **Has a FAR of less than 0.75:** Similar to the 2018 LRDP, the Update to the 2018 LRDP would be implemented through individual projects completed over time in locations throughout campus. The majority of existing campus development has a FAR between approximately 1.5 and 2, and future development of the Update to the 2018 LRDP would have FARs within this range based on projected building space and anticipated campus development areas. The majority of projects would redevelop existing lower-density developments and replace them with higher-density development. Because of this, efficient use of space through the construction of mid- to high-rise buildings would be necessary, and new development would typically have a larger FAR than 0.75. Therefore, this exception does not apply.

- **Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking):** UC San Diego is not subject to local land use or development regulations and therefore sets its own parking supply requirements. UC San Diego does not set campus wide parking requirements, and each project considers parking in a manner consistent with UC San Diego's sustainability goals. For example, a majority of student residents on campus are not allowed to bring their cars to campus in accordance with campus parking policy. As there is no applicable jurisdictional requirement for parking, this criterion is not applicable for determining whether the presumption of no significant VMT impact would be appropriate. The following discussion is provided to generally demonstrate that the Update to the 2018 LRDP would not result in excessive parking supply. The Update to the 2018 LRDP would not increase parking requirements over existing considerations for the incorporation of parking described above. Rather, the 2018 LRDP and Update to the 2018 LRDP prioritize the redevelopment of surface parking lots and densification of campus areas well-served by transit. While over time UC San Diego would replace some of the parking lost through this infill development through the construction of parking structures and/or inclusion of subterranean parking garages, the overall campus parking demand

would continue to be reduced over time due to the increased availability of on-campus housing and expansion of alternative transportation programs. This enables the campus to provide fewer parking spaces than is typically provided for large-scale projects in neighboring jurisdictions. On a project-by-project basis, UC San Diego constructs less parking compared to most projects off-campus in the City of San Diego, in accordance with the city's standard parking ratios (San Diego Municipal Code Chapter 14, Article 2, Division 5). Therefore, this exception does not apply.

- **Is inconsistent with the applicable SCS (as determined by the lead agency, with input from the Metropolitan Planning Organization)**: The most relevant SCS (although not applicable to UC San Diego due to its constitutional autonomy) would be SANDAG's 2021 Regional Plan, which includes the SCS, RTP, and Regional Comprehensive Plan. As described in Section 3.10.2.3, above, there are "5 Big Moves" identified in the 2021 Regional Plan, including use of complete corridors; a transit leap to provide a network of high-capacity, high-speed, and high-frequency transit service; mobility hubs where high concentrations of people, destinations, and travel choices converge; flexible fleets to provide a variety of on-demand shared vehicles including micro transit, bikeshare, scooters, and other modes of transportation that connect to transit; and "Next Operating System", a digital platform that ties the transportation system together in real time.

  The Update to the 2018 LRDP integrates land use, housing, employment, and alternative transportation planning strategies that are consistent with SANDAG's efforts towards the "5 Big Moves". For example, UC San Diego actively implements Complete Streets strategies by providing people with safe and comfortable spaces to get around on foot, bike, or micromobility device through ongoing efforts to increase safety of bicycle/micromobility lanes, reduce vehicle speeds, provide high-quality pedestrian and micromobility connections, and adaptive traffic signal technology to optimize roadway operations and give priority to buses. The campus hosts the Gilman Transit Center, a central mobility hub, as well as two UC San Diego Blue Line Trolley stations—areas in which the 2018 LRDP and Update to the 2018 LRDP propose to increase density, consistent with the 2021 Regional Plan goals. Subsidized transit passes are available for all students, staff, and faculty to encourage the use of these transit options. Additionally, the Triton Transit campus shuttle operated by UC San Diego offers an efficient way to get around the entire campus and the campus has partnered with Spin electric scooters to increase transit connections, consistent with the 2021 Regional Plan's "Flexible Fleets" move.

  Another key goal of the 2021 Regional Plan is to incentivize housing development in areas with access to transit, jobs, and other amenities. The 2018 LRDP and the Update to the 2018 LRDP would increase on-campus housing for both students and staff/faculty, by approximately 12,780 beds, in areas where these groups learn or work. The Update to the 2018 LRDP would increase the number of beds on campus with a focused increase in housing anticipated to occur adjacent to the UC San Diego Central Campus Trolley Station. Student housing is also offered at 20 percent below market rate, consistent with the 2021 Regional Plan's emphasis on affordable housing.

  The 2018 LRDP received support from SANDAG in its August 30, 2018, comment letter on the 2018 LRDP EIR, from which the proposed Update to the 2018 LRDP's SEIR is tiered. SANDAG recognized the regional benefit of the 2018 LRDP, including its smart growth and sustainable development approach, plan for additional housing and employment opportunities on campus, pedestrian and bike-friendly connections, and high-frequency

transit opportunities. The Update to the 2018 LRDP would continue the same planning goals, objectives, and strategies as the 2018 LRDP, as well as add more housing and employment density and continue to improve upon its transit ridership and "last mile" connections. Therefore, the proposed Update to the 2018 LRDP is consistent with the SANDAG 2021 Regional Plan, and this exception does not apply.

- **Replaces affordable residential units with a smaller number of moderate- or high-income residential units:** All student housing is offered at rents approximately 20 percent below market rate or lower, and the Update to the 2018 LRDP would not change this. Student housing provided under the Update to the 2018 LRDP would be increased to meet the 2018 LRDP goal of housing approximately 65 percent of eligible students. While redevelopment under the Update to the 2018 LRDP could temporarily displace existing housing, these temporary displacements would be replaced with an increase in the total number of units via higher-density, mid- and high-rise buildings offering the same standard of affordable housing. The Update to the 2018 LRDP plans to increase on-campus student housing by approximately 12,780 net new beds compared to the adopted 2018 LRDP. Therefore, this exception does not apply.

Since the VMT study area is located within a TPA and the Update to the 2018 LRDP does not introduce any project-specific factors that would result in significant VMT generation, the presumption of no significant VMT impact pursuant to CEQA Guidelines Section 15064.3(b)(1) applies. As a result, the Update to the 2018 LRDP would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and would not result in new or substantially more severe significant impacts compared to the 2018 LRDP EIR.

Level of Significance Before Mitigation

As described above, impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts to the VMT would remain less than significant without mitigation, consistent with the impact identified in the 2018 LRDP EIR.

3.10.4 CUMULATIVE IMPACTS AND MITIGATION

Transportation and Circulation Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative transportation and circulation impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Compliance with Circulation System Programs, Plans, Ordinances, or Policies.	Significant.	Cumulatively considerable.	Less than Significant.	Not cumulatively considerable.
Induce Substantial Vehicle Miles Traveled.	Less than Significant.	Not cumulatively considerable.	Less than Significant.	Not cumulatively considerable.

The geographic scope for analyzing cumulative transportation and traffic impacts encompasses off-campus–related projects and other future development within the general boundaries of the La Jolla and University communities (see Table 3-1 in Chapter 3.0, Environmental Setting, Impacts, and Mitigation, of this SEIR).

Compliance with Circulation System Programs, Plans, Ordinances, or Policies

The 2018 LRDP EIR concluded that significant cumulative impacts to roadway circulation would occur with buildout of the 2018 LRDP and the contribution of the 2018 LRDP would be cumulatively considerable given roadway congestion (LOS) impacts would be unmitigable. The cumulative impact related to alternative transportation was considered less than significant. This cumulative analysis considers whether the proposed Update to the 2018 LRDP would result in conflicts with applicable circulation system programs, plans, ordinances, and policies compared to the 2018 LRDP EIR; it does not consider LOS impacts identified in the 2018 LRDP EIR.

Cumulative projects identified in Table 3-1 and other future campus development would be required to comply with applicable UC and UC San Diego policies, plans, and programs pertaining to alternative transportation as conditions of project approval. Projects constructed within the City would need to comply with the policies in the City of San Diego General Plan (including the proposed Blueprint SD update to the 2008 General Plan), La Jolla Community Plan and Local Coastal Program Land Use Plan, 2024 University Community Plan Update, and SANDAG 2021 Regional Plan as applicable. Therefore, it is unlikely that future development would have a

significant cumulative effect on roadways or alternative transportation systems. UC San Diego would continue to operate and expand its alternative transportation programs to reduce vehicle trips to campus and increase the use of other transportation modes; therefore, implementation of the Update to the 2018 LRDP would not have a cumulatively considerable contribution to conflicts with transportation plans or policies. As such, the Update to the 2018 LRDP would result in a reduced cumulative impact related to transportation in comparison to the impact identified in the 2018 LRDP EIR.

Induce Substantial Vehicle Miles Traveled

The 2018 LRDP EIR concluded cumulative impacts related to VMT would be less than significant and the 2018 LRDP would not have a cumulatively considerable contribution to this impact. The Update to the 2018 LRDP SEIR provides a list of campus cumulative projects (refer to Table 3-1 of this SEIR).

In areas outside of the campus, buildout of the surrounding communities has the potential to result in a significant increase in regional VMT because of increased development outside of TPAs or other project-specific factors. For example, the determination in the EIR for the University Community Plan Update concluded that buildout of the University community would result in significant and unavoidable resident and employee VMT impacts as a result of development outside of VMT-efficient areas (City of San Diego 2024c). Individual development projects located in the City of San Diego, including but not limited to the University community, would be subject to the Mobility Choices regulations, which would reduce VMT impacts for individual development projects; however, these regulations cannot ensure that VMT impacts for all projects in the City of San Diego would be below a level of significance.

However, the proposed Update to the 2018 LRDP would be constructed within a TPA, and since the 2018 LRDP EIR was prepared, two UC San Diego Blue Line Trolley stations have been constructed in areas where the Update to the 2018 LRDP proposes to increase density, consistent with the 2021 Regional Plan goals. Further, UC San Diego also continues to implement its TDM program and improve alternative transportation options for campus populations. Therefore, the contribution of the Update to the 2018 LRDP to VMT impacts would be less than significant and not cumulatively considerable, consistent with the conclusion in the 2018 LRDP EIR.

3.10.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

The following section discusses the other Standards of Significance related to Transportation and Circulation contained in Appendix G of the CEQA Guidelines wherein the proposed Update to the 2018 LRDP was determined to not cause a significant effect.

Would the Update to the 2018 LRDP substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

There have been no substantial changes with regard to the setting of the campus land use, including farming, rural, or other incompatible uses since the 2018 LRDP EIR was certified. Changes to the campus circulation system that were not anticipated or analyzed in the 2018 LRDP EIR include the widening and realignment of East Campus Loop Road and the reconfiguration of Main Campus Loop

Road in the Theatre District. These alterations to the circulation system have been reviewed for safety by groups including UC San Diego Campus Planning, Capital Program Management, Environment, Health and Safety, and the Campus Fire Marshal. Therefore, no substantial increase in hazards due to the design of circulation improvements has occurred since certification of the 2018 LRDP EIR. No specific circulation changes are proposed in the Update to the 2018 LRDP SEIR. Nonetheless, future changes to circulation within campus would be reviewed by the appropriate campus staff and no substantial increase in hazards for users of the circulation system is anticipated to occur. Therefore, no changes in circumstances and no new information of substantial importance relative to this topic have been identified.

Based on the above, no new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Mitigation measures would not be required, consistent with the conclusions in the 2018 LRDP EIR.

Would the Update to the 2018 LRDP result in inadequate emergency access?

There have been no substantial changes with regard to the requirement for adequate emergency access to be provided on campus since the 2018 LRDP EIR was certified. Development on campus continues to occur in accordance with applicable California Fire Code and UC San Diego Wildland Fire and Fire Protection provisions for fire access, including code requirements for road width, grade, clearance, turnouts, dead-end length, and turnarounds to accommodate fire apparatus. Development under the Update to the 2018 LRDP would continue to achieve these emergency access requirements. Additional information related to emergency evacuation is provided in Section 3.13.3.1 of this SEIR, and as described therein, UC San Diego also amends the campus Emergency Operations Plan and applicable Emergency Action Plan when new development, redevelopment, or site improvements occur on campus to ensure that adequate fire protection equipment access is maintained. Therefore, no changes in circumstances and no new information of substantial importance relative to this topic have been identified.

Based on the above, no new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Mitigation measures would not be required, consistent with the conclusions in the 2018 LRDP EIR.

3.10.6 REFERENCES

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3.11 TRIBAL CULTURAL RESOURCES

This section of the SEIR evaluates the potential for impacts to tribal cultural resources resulting from implementation of the Update to the 2018 LRDP. The majority of the information provided in this section is summarized from the Archaeological Resources Report for the 2018 UC San Diego LRDP prepared by AECOM (Appendix D of the 2018 LRDP EIR; Jow and Cooley 2018); the Addendum to the Archaeological Resources Report for the 2018 UC San Diego LRDP (Addendum Report) prepared by HELIX (Appendix D [Confidential]; Turner and Robbins-Wade 2025); and consultation with Native American tribes pursuant to AB 52.

The 2018 LRDP discussed tribal cultural resources within Section 3.4, Cultural and Tribal Cultural Resources. For this SEIR, tribal cultural resources are discussed separately in this section to be consistent with the current guidance from CEQA Guidelines Appendix G. A general discussion of cultural resources is included in Section 3.4, Cultural Resources, of this SEIR, which may be referenced in this section. Pursuant to PRC Section 21083.9, this section focuses solely on the Update to the 2018 LRDP's potential impacts to tribal cultural resources.

3.11.1 ENVIRONMENTAL SETTING

The tribal cultural resources present at UC San Diego and the surrounding areas are described in detail in Section 3.4 of the 2018 LRDP EIR, including discussion of the historical context of the area, known and potential tribal cultural resources, and relevant federal and state regulations. This section focuses on changes from information disclosed in the 2018 LRDP EIR and provides an updated analysis of potential impacts on tribal cultural resources relative to revisions proposed in the Update to the 2018 UC San Diego La Jolla Campus LRDP and current regulations.

3.11.1.1 CULTURAL RESOURCE STUDIES AND MONITORING PROGRAMS – POST 2018

The Addendum to the Archaeological Resources Report prepared for the Update to the 2018 LRDP includes a comprehensive review of archaeological monitoring and reporting that was conducted after certification of the 2018 LRDP EIR. Most of these post-2018 projects resulted in no newly identified resources being identified on the UC San Diego campus; however, the projects discussed below resulted in the identification of previously unrecorded tribal cultural resources.

In compliance with the UC San Diego 2018 LRDP mitigation measures Cul-2D, and Cul-2E, Red Tail Environmental conducted an archaeological monitoring program for the Ridge Walk North Living & Learning Neighborhood Project in 2023. Kumeyaay Native American Monitors from Red Tail and six Tribes/Bands also participated in the monitoring program. The Tribes/Bands that participated in the monitoring program include the Campo Band of Mission Indians, the Jamul Indian Village, the La Posta Band of Mission Indians, the Manzanita Band of Kumeyaay Indians, the San Pasqual Band of Mission Indians, and the Viejas Band of Kumeyaay Indians. The project consisted of the development of new student residential and educational facilities and resulted in the recovery of one historic-era resource and seven prehistoric isolated resources (see discussion of study included in the 2024 HELIX study). Following the completion of the project, UC San Diego entered into consultation with the Kumeyaay Cultural Repatriation Committee ("KCRC") regarding the repatriation of the recovered prehistoric resources. KCRC was created in 1997 to aid the San Diego area Kumeyaay bands in the repatriation of their ancestors' human remains, tribal artifacts and

cultural objects of a patrimony heritage, and includes representatives from the tribes that participated in the monitoring program. Site options are being considered for the final location of reburial.

An additional study conducted by Red Tail Environmental in 2020, located adjacent to the UC San Diego properties but outside the 2018 LRDP boundary, resulted in the reidentification of significant and sensitive cultural resources. This study consisted of a pedestrian survey of an area within the Scripps Coastal Reserve. Two resources were mapped at the SCIC as being within the Scripps Coastal Reserve. The search of the NAHC Sacred Lands File was returned with negative results; the response also included a list of Native American Tribes and interested parties to contact for further information. However, shortly after Red Tail sent letters to the Native American tribes and interested parties, the Kwaaymii Laguna Band of Indians responded, noting that the area was sensitive and had known sensitive resources. The field survey resulted in the reidentification of the resources originally mapped within the Scripps Coastal Reserve. Although this study is not located within the LRDP area, it does demonstrate the sensitivity of the coastal region surrounding the UC San Diego properties.

A detailed discussion of other tribal cultural resources in the vicinity of UC San Diego can be found in Section 3.4.1 of the 2018 LRDP EIR.

AB 52 Consultation

As part of the LRDP Update, HELIX, on behalf of UC San Diego, contacted the NAHC on January 17, 2024, for an updated Sacred Lands File search and a list of Native American Tribes and interested parties that are traditionally and culturally affiliated with the geographic area. The NAHC responded on February 5, 2024, noting that the results of the search were positive, and included a list of 17 individuals from 13 Native American Tribes to contact. UC San Diego sent formal AB 52 consultation notices to these individuals on February 19, 2024. In addition, because a UC San Diego representative regularly attends KCRC monthly meetings, verbal requests to review and respond to UC San Diego's consultation letters were provided to all members of the KCRC, which is comprised of representatives from all 12 Kumeyaay Tribes. Responses were received from three Tribes, the Campo Band of Mission Indians, the San Pasqual Band of Mission Indians, and the Sycuan Band of the Kumeyaay Nation, requesting to consult with UC San Diego regarding the Update to the 2018 LRDP. Initial meetings were held with each of these three Tribes in May 2024, and consultation with these Tribes is currently ongoing, with a summary of outreach and responses provided in Table 3.11-1, *Native American Consultation Outreach and Responses*.

Table 3.11-1
Native American Consultation Outreach And Responses

Affiliation	Name/Title	Email Date	Outreach/Response
Campo Band of Mission Indians	Daniel Tsosie, Tribal Historic Preservation Officer	02/19/2024	UC San Diego sent formal consultation notice to Tribe.
		02/23/2024	Mr. Tsosie responded via email, requested consultation.
		11/14/2024	UC San Diego emailed to schedule ongoing consultation
		11/20/2024	UC San Diego followed up regarding scheduling ongoing consultation.

Affiliation	Name/Title	Email Date	Outreach/Response
		12/02/2024	UC San Diego followed up regarding scheduling ongoing consultation.
		12/02/2024	Mr. Tsosie responded via email indicating that Campo will review the Draft Cultural Monitoring, Discovery, and Treatment Plan.
		02/18/2025	UC San Diego provided updated Draft Cultural Monitoring, Discovery, and Treatment Plan and requested feedback.
		03/24/2025	UC San Diego followed up regarding scheduling ongoing consultation.
Native American Heritage Commission	N/A	01/17/2024	HELIX, on behalf of UC San Diego, requested an updated Sacred Lands File Search and a list of Native American Tribes and Interested Parties.
		02/05/2024	The NAHC responded, noting that the results of the search were positive, and included a list of 17 individuals from 13 Native American Tribes to contact.
San Pasqual Band of Mission Indians	Desiree Morales, Tribal Historic Preservation Officer	02/19/2024	UC San Diego sent formal consultation notice to Tribe.
	Angelina Gutierrez, Deputy Tribal Historic Preservation Officer	03/01/2024	Ms. Gutierrez responded via letter, requested consultation.
	John Flores, Environmental Coordinator	05/22/2024	UC San Diego provided Draft Cultural Monitoring, Discovery, and Treatment Plan.
		05/22/2024	Ms. Gutierrez responded via email, stating that San Pasqual will review the document.
		06/25/2024	UC San Diego emailed to schedule a campus tour.
		11/14/2024	UC San Diego emailed to schedule ongoing consultation
		11/20/2024	UC San Diego followed up regarding scheduling ongoing consultation.
		12/02/2025	UC San Diego followed up regarding scheduling ongoing consultation.
		02/18/2025	UC San Diego provided updated Draft Cultural Monitoring, Discovery, and Treatment Plan and requested feedback.
		03/24/2025	UC San Diego followed up regarding scheduling ongoing consultation.

Affiliation	Name/Title	Email Date	Outreach/Response
Sycuan Band of the Kumeyaay Nation	Bernice Paipa, Cultural Resource Specialist	02/19/2024	UC San Diego sent formal consultation notice to Tribe.
		03/04/2024	Ms. Paipa responded via email, requested consultation.
		05/29/2024	UC San Diego provided Draft Cultural Monitoring, Discovery, and Treatment Plan.
		11/14/2024	UC San Diego emailed to schedule ongoing consultation.
		11/20/2024	UC San Diego followed up regarding scheduling ongoing consultation.
		11/20/2024	Ms. Paipa acknowledged receipt of Draft Cultural Monitoring, Discovery, and Treatment Plan and indicated a willingness to consult.
		11/20/2024	UC San Diego followed up to schedule consultation meeting.
		12/02/2025	UC San Diego followed up regarding scheduling ongoing consultation.
		12/04/2025	Ms. Paipa responded via email, indicating that the KCRC will work to schedule a consultation meeting with UC San Diego.
		02/18/2025	UC San Diego provided updated Draft Cultural Monitoring, Discovery, and Treatment Plan and requested feedback.
		02/18/2025	UC San Diego provided updated Draft Cultural Monitoring, Discovery, and Treatment Plan and requested feedback.
		03/24/2025	UC San Diego followed up regarding scheduling ongoing consultation.

3.11.2 REGULATORY FRAMEWORK

Please see Section 3.4.2, *Cultural and Tribal Cultural Resources*, of the 2018 LRDP EIR for a discussion of regulations relevant to the proposed project.

3.11.3 PROJECT IMPACTS AND MITIGATION

3.11.3.11 ISSUE 1 — REGIONAL LOSS OF TRIBAL CULTURAL RESOURCES

Tribal Cultural Resources Issue 1 Summary

Would implementation of the Update to the 2018 LRDP cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

I. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources code section 5020.1(k), or

II. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native tribe.

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Procedures for unknown resources (Cul-2D); and Cultural Resources Construction Monitoring Protocol (Cul-2E).

Summary of Analysis in the 2018 LRDP EIR

Section 3.4.3.5 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP could result in the disturbance of tribal cultural resources due to the known existence of sensitive resources in the vicinity of UC San Diego. Consultation with the Iipay Nation of Santa Ysabel confirmed that several sites in the vicinity of UC San Diego are considered sacred due to the known presence of tribal cultural resources, and one of these sites had the potential to be affected by redevelopment

under the 2018 LRDP EIR. Mitigation measures Cul-5A through Cul-5C were proposed to reduce the impacts to a less than significant level.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP includes updated development densities and land use changes, warranting an analysis of the proposed changes under the Update to the 2018 LRDP's potential impacts on tribal cultural resources for areas that may not have been included in the survey for the 2018 LRDP (Jow and Cooley 2018).

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Numerous cultural resources studies have occurred following the adoption of the LRDP in 2018 and new tribal cultural resources have been discovered; the Addendum Report prepared for the Update to the 2018 LRDP contains further details regarding these studies and tribal cultural resources (Turner and Robbins-Wade 2025).

Standards of Significance

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would cause a substantial adverse change in the significance of a tribal cultural resource, defined in California PRC, Section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe; and that is:

1. Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in California PRC, Section 5020.1(k); or

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of California PRC, Section 5024.1. In applying the criteria set forth in subdivision (c) of California PRC, Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The discussion below relies on the AECOM Archaeological Resources Report prepared for the 2018 LRDP EIR, archaeological data acquired since preparation of the 2018 LRDP EIR as outlined in the Addendum to the Archaeological Resources Report (Turner and Robbins-Wade 2025), and consultation with Tribes pursuant to AB 52. Updated archaeological information is compared to the 2018 analysis, as well as proposed land use changes and redevelopment under the Update to the 2018 LRDP, to determine the significance of project impacts.

Impact Analysis

As described in Section 3.11.1.1 above, previously unrecorded tribal cultural resources have been identified on and around the UC San Diego campus since preparation of the 2018 LRDP EIR. These results are consistent with the 2018 LRDP EIR's conclusion that tribal cultural resources are known to occur in the project vicinity and that redevelopment activities have the potential to disturb sensitive sites.

Regarding changes to anticipated development projects under the Update to the 2018 LRDP SEIR, two areas within the Open Space Preserve are now proposed for development and were not specifically addressed in the 2018 study. To account for the two areas within the Open Space Preserve which are now proposed for potential development of utility infrastructure under the Update to the 2018 LRDP, a field survey of the two proposed utility areas was conducted by a HELIX archaeologist and a Red Tail Native American monitor on October 15, 2024 (Turner and Robbins-Wade 2025). As part of the Addendum Report, an updated search of the NAHC's Sacred Land File was requested, and an updated Records Search was conducted at the SCIC. However, no tribal cultural resources were identified as a result of the records search or the field survey, potentially in part due to the visibility constraints discussed further in the Addendum Report. As also addressed in the Addendum, a previously recorded historic era (twentieth century) resource was mapped as partially extending into one of the utility areas. This resource was not observed during the field survey, possibly because it was mismapped, or possibly due to the dense vegetation. In addition, these areas will be the subject of project-specific cultural resource surveys prior to approval of development projects, and testing of resources within the development footprint will be required; this testing would consist of limited archaeological excavations designed to identify and sample subsurface deposits to identify horizontal and vertical components of the resource, as well as to assess the significance of the resource.

Level of Significance Before Mitigation

Impacts to tribal cultural resources would be potentially significant, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

Measures removed from the 2018 LRDP EIR:

The 2018 LRDP EIR identified mitigation measures Cul-5A (Avoidance and Preservation), Cul-5B (Monitoring), and Cul-5C (Repatriation) to address potentially significant impacts to tribal cultural resources. These measures are no longer applicable and have been removed, as the content of these measures has been updated per input from the Tribes and is now incorporated into the Cultural Resources Monitoring, Discovery, and Treatment Plan for the Update to the UC San Diego La Jolla Campus 2018 Long Range Development Plan, which is required to be implemented per mitigation measure Cul-2E. Please refer to Section 3.4.3.2 and Appendix D2 of this SEIR.

Revised mitigation measures for the Update to the 2018 LRDP:

Measures Cul-2D and Cul-2E have been revised to reflect the involvement and input of Kumeyaay Tribes and KCRC, which had not been included in the 2018 LRDP. In addition, a Cultural Resources Monitoring, Discovery, and Treatment Plan for the Update to the UC San Diego 2018 LRDP for the

La Jolla Campus is being developed in consultation with the three Kumeyaay Tribes who consulted on the Update under AB 52 (Campo Band of Mission Indians, the San Pasqual Band of Mission Indians, and the Sycuan Band of the Kumeyaay Nation). A draft of the Plan is included as Appendix D2 to this SEIR. UC San Diego has conducted outreach with the Consulting Tribes to request review and approval of the Plan; however, no comments or revisions have been provided to date and consultation is ongoing (see Table 3.11-1).

Level of Significance After Mitigation

Implementation of mitigation measures Cul-2D through Cul-2E would reduce impacts from implementation of the Update to the 2018 LRDP SEIR to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

3.11.4 CUMULATIVE IMPACTS AND MITIGATION

Tribal Cultural Resources Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative tribal cultural resources impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Regional loss of tribal cultural resources.	Potentially significant.	Cumulatively considerable and unavoidable.	Potentially significant.	Cumulatively considerable and unavoidable, even with Cul-2D and Cul-2E.

Section 3.4.4 of the 2018 LRDP EIR concluded that the 2018 LRDP would contribute to a cumulatively considerable and unavoidable impact. The geographic context for consideration of cumulative impacts to tribal cultural resources is the ancestral territory of the Kumeyaay Tribes, which extends roughly from below Santo Tomas in Mexico north to the San Luis Rey River and east to the Colorado River. In addition to conducting Sacred Lands File searches through the NAHC during the CEQA process, local jurisdictions in the region must initiate a consultation with the Native American tribes as part of their compliance with AB 52. The regional loss of tribal cultural resources by construction and development within the historic boundaries of the Kumeyaay national territory, in particular resources associated with the cultural and physical remains of people whose descendants are living today, is considered a cumulatively significant impact.

Tribal cultural resources are known to occur within the campus and vicinity and redevelopment activities both on campus and in the surrounding area have the potential to disturb sensitive sites, including those listed in Table 3-1. Although implementation of the Update to the 2018 LRDP has the potential for impacts to tribal cultural resources on the campus, impacts to these resources

would be addressed through consultation with Native American Tribes pursuant to PRC Section 21084.3.2. Further, with the updates to mitigation measures Cul-2D and Cul-2E, which incorporate Native American Tribal monitoring as a requirement, and the development of the Cultural Resources Monitoring, Discovery, and Treatment Plan for the Update to the UC San Diego 2018 La Jolla Campus LRDP that will be required as part of Cul-2E, UC San Diego is proactively involving greater coordination with the Tribes as part of the AB 52 process than the previously approved measures. Therefore, the Update to the 2018 LRDP would not result in a new or substantially more severe impact than the 2018 LRDP EIR. However, because it is not always feasible to avoid these resources, the cumulative effects of past and present projects in the San Diego region could result in a potentially significant cumulative impact on tribal cultural resources and the Update to the 2018 LRDP's contribution to cumulative impacts to tribal cultural resources has the potential to be cumulatively considerable and unavoidable, consistent with the conclusion in the 2018 LRDP EIR.

3.11.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under tribal cultural resources are evaluated above. There are no CEQA issues where there is no potential for a significant effect.

3.11.6 REFERENCES

Jow, Stephanie and Theodore G. Cooley. 2018. *Archaeological Resources Report for the 2018 UC San Diego Long Range Development Plan, San Diego County, California*. Prepared by AECOM for Baranek Consulting Group. November.

Turner, James and Mary Robbins-Wade. 2025. *Supplement to the Archaeological Resources Report for the 2018 UC San Diego Long Range Development Plan.* Prepared for UC San Diego by HELIX Environmental Planning, Inc. (HELIX). February 21.

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3.12 UTILITIES AND SERVICE SYSTEMS

This section evaluates the potential impacts on utilities, service systems, and energy resulting from implementation of the Update to the 2018 LRDP. Existing on-campus utility and service systems that would continue to serve the campus under the Update to the 2018 LRDP include water supply (potable, reclaimed, and chilled/heated piping), wastewater, storm water, solid waste, and energy (electricity, natural gas). This section evaluates whether new or substantially more severe environmental impacts related to utilities and service systems would result from the proposed Update to the 2018 LRDP compared to those identified in Section 3.15, Utilities, Service Systems, and Energy, of the 2018 LRDP EIR.

This section is based on a variety of information obtained from campus utility studies, UC San Diego staff, and independent research. Specifically, this section references master utility planning studies prepared for the Update to the 2018 LRDP SEIR, including the Sewer Study (Latitude 33 2025a), Domestic Water Study (Latitude 33 2025b), and Drainage Study (Latitude 33 2025c). Where applicable, information used to evaluate the 2018 LRDP is provided as a point of comparison, including data from the campus-wide Domestic Water Study (Latitude 33 2018a), Drainage Study (Latitude 33 2018b), Recycled Water Study (Latitude 33 2018c) and Sewer Study (Latitude 33 2018d). Due to changes in the Appendix G CEQA Guidelines since the preparation of the 2018 LRDP EIR, energy use is addressed in Section 3.5 of this SEIR.

3.12.1 ENVIRONMENTAL SETTING

UC San Diego's environmental setting related to public utilities and services are described in Section 3.15, of the 2018 LRDP EIR. This section focuses on changes from the information disclosed in the 2018 LRDP EIR, including updated supply and demand forecasts for the UC San Diego campus and the San Diego region for water, wastewater, solid waste, and telecommunications.

3.12.1.1 WATER SUPPLY

The City of San Diego Public Utilities Department (PUD) is the water supply agency for UC San Diego. The PUD and other local retail water distributors formed the San Diego County Water Authority (Water Authority) for the purpose of purchasing Colorado River water from the Metropolitan Water District of Southern California (MWD), a large wholesale water provider.

Under the Water Supply Assessment law (Sections 10910 through 10915 of the California Water Code), urban water suppliers like PUD must furnish a Water Supply Assessment (WSA) Report to the city or county (lead agency) that has jurisdiction to approve the environmental documentation for certain qualifying projects (as defined in California Water Code Section 10912 (a)), subject to CEQA. While UC San Diego is not subject to the WSA law, for the 2018 LRDP, UC San Diego voluntarily requested the preparation of a WSA to inform the EIR and as part of its ongoing cooperative planning relationship with the City and County agencies. That WSA report evaluated water supplies that are or will be available during normal, single-dry years, and multiple-dry water years during a 20-year projection from 2020 to 2040. The WSA report for the 2018 LRDP assessed projections for the time period covered by the Update to the 2018 LRDP. No new WSA was prepared for the Update to the 2018 LRDP.

Urban Water Management Plans

Each water supply agency prepares a long-term water resources planning document, or Urban Water Management Plan (UWMP), and updates it every five years. UWMPs are used by water suppliers when planning for and proposing new projects. The City's 2020 UWMP was the most recent, developed in collaboration with the Water Authority and adopted by the San Diego City Council in May 2021. This plan provides information on current and future water demands and supplies, discusses water resources challenges and summarizes major initiatives that the City has proactively taken to ensure a safe, reliable water supply for its water customers. The 2018 LRDP relied on the City's previous 2015 UWMP. Changes between the 2015 and 2020 UWMPs included changes in forecasted water demand, with future water demand estimates being lower in the 2020 UWMP (City 2016; 2021). The Water Authority also developed a separate 2020 UWMP in March 2021. Similar to the City, changes between the 2015 and 2020 UWMPs include reductions in the forecasted water demand (Water Authority 2016; 2021). The reasons for these reductions are explained below.

Existing and Projected Water Supplies

Similar to the existing conditions discussed in the 2018 LRDP EIR, supply diversification remains important for the Water Authority to provide consistent supply to the San Diego region. Supply diversification and storage pursuits by the Water Authority include acquiring and importing additional water supplies (e.g., IID transfer, canal linings), developing local water supply projects (e.g., seawater desalination, water recycling and groundwater projects), augmenting its water supply via local and regional water storage capacity (e.g., the Emergency Storage Program [ESP] and associated Olivenhain Reservoir and San Vicente Dam), and implementing other projects under its Capital Improvement Program (CIP; Water Authority 2021). While the Water Authority and, accordingly, the PUD, will continue to rely on imported water to meet water supply needs into the foreseeable future, the agencies' dependence on imported water continues to gradually wane with the advancement of the noted local resources. For example, due to significant investments over the last several decades, more than 50 percent of the City's water supply will be locally sourced by 2045, compared to the 1990s, when 95 percent was imported (City 2021).

Availability of Sufficient Supplies. The adequacy of water supplies to serve existing and planned uses within the PUD service area, which includes the UC San Diego La Jolla campus, is demonstrated in the 2020 UWMPs for the City and Water Authority. The adequacy of supplies available for campus is provided in greater detail in the WSA Report to the 2018 LRDP. The PUD currently purchases approximately 85 to 90 percent of its water from the Water Authority, which supplies the raw and treated water to PUD through two aqueducts consisting of five pipelines (City 2024a). The PUD meets or offsets the remaining potable water demand through four local supply resources, including local surface water, groundwater, conservation, and recycled water.

According to the Water Authority's 2020 UWMPs, as a result of reduced forecasted growth in housing, the total regional demand forecast in its service area is expected to be about 14 percent lower in 2025 and about 15 percent lower in 2040 compared to the same projections made in the Water Authority's 2015 UWMP[1]. Similarly, the City's UWMP forecasts are now approximately 20

[1] The Water Authority's 2015 UWMP forecasted 648,124 AFY of normal year regional water demand in 2025 compared to 555,758 forecasted for the same year in the 2020 UWMP. For 2040, the demand was forecasted as 718,773 in the 2015 UWMP compared to 614,235 in the 2020 UWMP.

percent lower for 2025 and 23 percent lower for 2040[2]. By 2040, total normal water demands for the Water Authority's service area are projected to reach 630,771 acre-feet per year (AFY).

Plans for Acquiring Additional Supplies. In 2013, the City approved the 2012 Long-Range Water Resources Plan (2012 LRWRP), which is a high-level strategy document that evaluates water supply and demand objectives against multiple planning objectives through the year 2035. The 2012 LRWRP has not been updated since approval of the 2018 LRDP.

Also addressed in the LRWRP is PUD's active development of groundwater resources for municipal water supply or other beneficial uses. Under the City's potable reuse program (Pure Water San Diego), the City would maximize the use of recycled water that currently is used for non-drinking uses through advanced water purification process to render it safe for use as a drinking water supply. This process uses multiple treatment barriers and ultimately results in purified water that meets all drinking water standards and is similar in quality to distilled water. Pure Water San Diego, to be implemented in phases, is expected to provide nearly half of the City's water supply locally by 2035. The first phase, currently under construction, includes 12 different projects that will clean recycled water to produce 30 MGD of purified water (City 2023a).

The City's 2020 UWMP provides projected water supplies for the City. By 2040, following full implementation of the Pure Water San Diego project, the total City derived supply would be approximately 129,248 AFY. This would be an increase of 76,160 AFY compared to the 53,088 AFY estimated for 2025. By 2040, approximately 55,428 AFY less water would need to be purchased by the City from the Water Authority, as compared to 2025 (City 2021).

UC San Diego Water Demand

Similar to the existing conditions in the 2018 LRDP, UC San Diego is dependent upon potable water from the PUD for drinking, sanitation, fire protection, heating, air conditioning, research activities, and landscape irrigation and recycled water for process (e.g., cooling tower) water and landscape irrigation.

In accordance with the UC Sustainable Practices Policy, UC San Diego's potable water use per capita is calculated by dividing the gallons of potable water used per fiscal year (based on City water meter billing data) by the weighted campus user. The UC Sustainable Practices Policy has set various goals related to sustainable water systems, including a 36 percent reduction in growth-adjusted potable water consumption by 2025, implementation of low water landscaping practices, development of a Water Action Plan, and application of water efficiency measures in new building projects (UC 2024).

The four largest water usage categories on campus consist of housing, industrial, irrigation, and laboratories, while the remaining four categories (office, healthcare, restaurants, and other uses) make up less than 25 percent of total water demand. The Update to the 2018 LRDP would increase housing, laboratory, healthcare, irrigation and academic water demand. Domestic water supply also supports the campus fire water system. In addition, the use of recycled water for industrial use in

[2] The City's 2015 UWMP forecasted 216,297 AFY of potable water demand in 2025 compared to 172,073 forecasted for the same year in the 2020 UWMP. For 2040, the demand was forecasted as 246,801 in the 2015 UWMP compared to 190,941 in the 2020 UWMP.

the cooling towers at the Central Utilities Plant, East Campus Utility Plant and Medical Center Utility Plant have reduced potable water use.

UC San Diego also requires new major construction projects to be planned, designed and built as resource efficient facilities. At a minimum, all future buildings would meet LEED Gold Certification, which would reduce the demand for water through the addition of water meters, reduced irrigation, efficient appliances, and rainwater management. LEED buildings consider the building site, water efficiency, energy efficiency and other environmental standards.

3.12.1.2 WASTEWATER

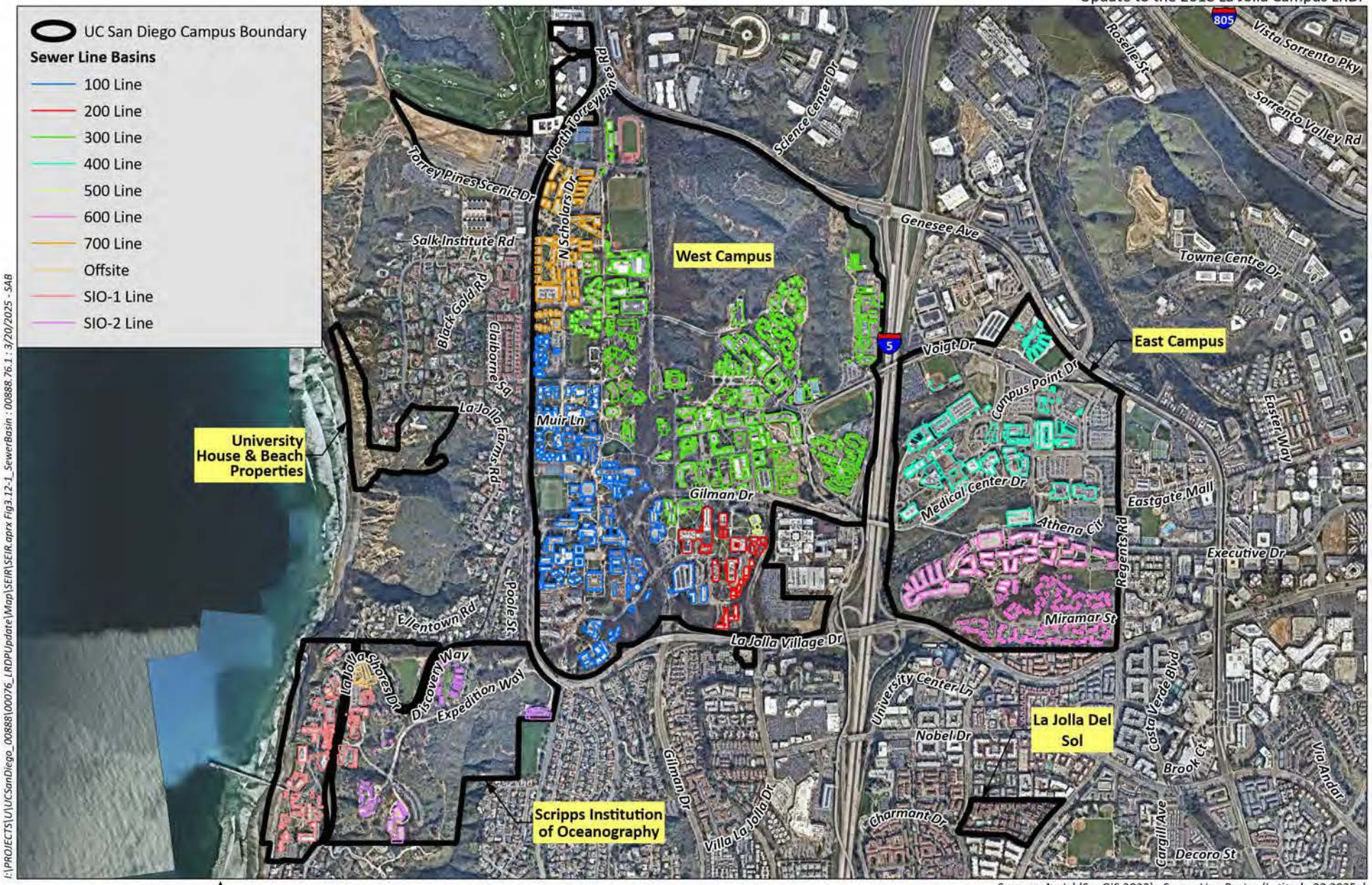
The UC San Diego wastewater system provides sewage disposal for the campus predominantly through a gravity flow system; however, several sewer pumps and lift stations also exist on campus. Wastewater lift stations exist at the following on-campus locations: north of the North Torrey Pines Living and Learning Neighborhood (former University Extension site), Campus Services Complex near Greenhouse Lane, and in the Health Sciences West near the Center for Neural Circuits and Behavior building.

The UC San Diego campus is served by a variety of internal sewer mains which ultimately discharge to several City mains at the edges of campus. There are currently four UC San Diego main systems in the West Campus: Gilman Drive Main, Villa La Jolla Main, La Jolla Village Drive Main, and the Eleanor Roosevelt College Main. Two UC San Diego main systems serve the East Campus: The Medical Center Main as well as the Mesa Housing Main. Finally, two mains service the SIO portion of campus: the Biological Way Main (a City of San Diego public main) and the Expedition Drive Main. Gilman Drive, Villa La Jolla, La Jolla Village Drive and Medical Center Mains all converge and exit the campus on the south side through the Gilman Drive Trunk Main. All other mains have their own individual connection to the City of San Diego sewer system. Except for the Biological Way Main, which conveys wastewater from La Jolla Estates, there are no upstream or northerly connections to the sewer before serving the campus. Wastewater from the west and east campuses typically flows from north to south in the UC San Diego collection system.

UC San Diego has researched and labeled the existing sewer systems to record basin limits and track maintenance within the campus. Sewer basins are identified by numbers ranging from 100 through 700, with manholes labeled within each basin. SIO is split between two separate sewer mains serving that portion of campus. Figure 3.12-1, *Sewer Basins*, identifies these sewer basins within campus.

The Sewer Study prepared for the Update to the 2018 LRDP states that 100 percent of the water flow to campus buildings is discharged to the sewers, and water used for irrigation is excluded from the calculation of sewer generation rates (Latitude 33 2025a). The Sewer Study uses similar calculations as what was conducted for the 2018 LRDP, with a peaking factor of 3.0 to calculate peak flow rates. This represents a conservative measure based on the overall projected population of the campus. The 2018 LRDP EIR identified that the campus under the 2018 LRDP would lead to average daily sewage flows of 3.76 MGD in 2035. Peak hour demand would be 11.32 MGD. Using recent water meter data provided by UC San Diego in the last seven years, current flows amount to approximately 2.28 MGD average daily flows and 6.85 MGD of peak hour demand.

The UC San Diego wastewater system connects to the City of San Diego Public Utilities Metropolitan Waste Water Department (MWWD) system, with an ultimate disposal at the Point Loma Wastewater Treatment Plant (PLWTP). On its way to the PLWTP, all wastewater generated on the



Source: Aerial (SanGIS 2023); Sewer Line Basins (Latitude 33 2025a)

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HELIX Environmental Planning

Sewer Basins

Figure 3.12-1

campus, except SIO, flows south towards the City's Rose Canyon Trunk Sewer through sewer connections at Gilman Drive and La Jolla Village Drive. The sewer trunk main that carries SIO wastewater runs within La Jolla Shores Drive before tying into Pump Station 27. The PLWTP has a treatment capacity of 240 MGD and treats approximately 155 MGD of wastewater generated by residential, institutional, and industrial users in the MWWD's service area. By 2035, however, it is anticipated that the amount of wastewater discharged from PLWTP will be reduced by over 50 percent due to implementation of the Pure Water San Diego (City 2024b).

3.12.1.3 SOLID WASTE

Collectively, UC campuses and Medical Centers diverted approximately 70 percent of municipal solid waste from landfills in 2022-23. Campus waste at UC San Diego is generally composed of municipal solid waste, landscaping waste, recyclables, surplus equipment, laboratory waste, electronic waste and food waste. Waste generated on the UC San Diego campus is either disposed or diverted. While UC San Diego Facilities Management (FM) Department is responsible for recycling, food composting, and solid waste management on much of the campus, the UC San Diego Medical Center handles its own waste and is not managed by FM. The University Centers department manages its own organics diversion program associated with its dining facilities.

Methods of waste diversion at the UC San Diego campus include recycling, composting, and source reduction (not generating waste). The UC Sustainable Practices Policy has set the goal to achieve zero waste through prioritizing waste reduction in the following order: reduce, reuse, and then recycle and compost. Each UC location, including UC San Diego, prepares an annual report to track progress toward these goals. In addition, the UC campuses are required to maintain a Zero Waste Plan to evaluate their reduction targets, review waste reduction and regional recycling options and address how they plan to reach the zero-waste target. As of August 2023, UC San Diego diverts approximately 45 percent of solid waste, excluding construction and demolition (UC San Diego 2023).

UC San Diego's solid waste is primarily sent to three regional landfills: Miramar Landfill, Sycamore Landfill, and Otay Landfill. According to the Solid Waste Information System (SWIS) database maintained by the California Department of Resources Recycling and Recovery (CalRecycle), the Miramar Landfill had a remaining capacity of approximately 11,080,871 cubic yards of solid waste as of January 30, 2020. Based on the remaining capacity and disposal rates, the Miramar Landfill is expected to close January 1, 2031 (CalRecycle 2024).

Two other landfills, Sycamore Landfill and Otay Landfill, provide disposal capacity within the urbanized region of the City. The Sycamore Landfill is located to the south of MCAS Miramar within the East Elliot Community Plan area of the City. The Otay Landfill is located within an unincorporated area within the City of Chula Vista. The SWIS database indicates that the Sycamore Landfill had a remaining capacity of 113,972,637 cubic yards as of December 31, 2016, and is expected to close December 31, 2042. The Otay Landfill had a remaining capacity of 21,194,008 cubic yards as of May 31, 2016, and is expected to close February 28, 2030 (CalRecycle 2024).

3.12.1.4 ENERGY (ELECTRICITY AND NATURAL GAS)

As described in Section 3.5.1, Energy, of this SEIR, the campus's energy sources include electricity generated on campus at the cogeneration facility, electricity purchased from the UC Energy Services Unit Direct Access Program, a small amount of electricity purchased from San Diego Gas & Electric

(SDG&E) by privately-operated facilities on a UC San Diego ground lease, and natural gas purchased from SDG&E. UC San Diego has built one of the world's the most advanced microgrids, which provides a flexible, resilient, reliable, secure energy distribution system that is capable of generating approximately 85 percent of the electricity used on campus annually. The campus contains a large solar network consisting of an array of rooftop, carport and ground mounted systems, including several integrated with advanced energy systems.

The campus' cogeneration plant uses one fuel source (natural gas) to produce electricity and heat for the campus. Natural gas pipelines supply gas to both the cogeneration plant and other locations on campus. Similarly, electricity is supplied throughout campus via a network of underground cables and connections. Additional infrastructure is located throughout campus. A 69kV electrical substation serving the campus is located at the northern edge of East Campus, near the Preuss School. The Central Utilities Plant, which contains the cogeneration plant, is located northwest of the intersection of Gilman Drive and Biomedical Sciences Way.

3.12.1.5 TELECOMMUNICATIONS

UC San Diego is serviced by a telecommunications network which includes telephone and internet services. The campus is serviced by a telephone network that includes desk phones, payphones, and emergency call boxes throughout campus. These telecommunications services are administered by UC San Diego's Information Technology (IT) Services (UC San Diego 2024). Desk phones are located throughout campus in offices, classrooms, labs, and some residences. Pay phones can be found throughout campus, but in recent years some pay phones have been eliminated on campus. UC San Diego also maintains emergency call boxes throughout campus for quick access to emergency services. UC San Diego also maintains a high-speed campus internet network for residents, students, faculty and staff, and guests. Most of these telecommunication services are administered or maintained by UC San Diego, using infrastructure throughout campus. Some services, such as Spectrum and cable television services, are administered by private companies.

Private cellular phone companies also service UC San Diego and surrounding areas. The infrastructure to support cell service is not directly maintained by UC San Diego but is instead constructed and operated by private companies. National cellular phone companies, such as T-Mobile, AT&T, and Verizon utilize individual cell towers to provide phone and internet access throughout the region. These towers are located in and around the UC San Diego campus, and additional towers may be erected in the future depending on demand changes and availability.

3.12.2 REGULATORY FRAMEWORK

As with the 2018 LRDP EIR, there are no federal regulations specifically applicable to the Update to the 2018 LRDP regarding utilities and service systems. Applicable state, UC, UC San Diego, and non-regulatory local regulations, policies, and programs are described in detail in Section 3.15.2, Regulatory Framework, of the 2018 LRDP EIR. The following section focuses on new or updated regulations and guidance that have occurred since certification of the 2018 LRDP EIR.

3.12.2.1 STATE

California Environmental Quality Act Guidelines

In 2019, the CEQA Guidelines were updated within the Utilities section of Appendix G to combine the analyses related to the construction of stormwater, wastewater, and water facilities, and to add the consideration of electrical power, natural gas, and telecommunications infrastructure. The Guidelines also updated language related to the assessment of solid waste, with a consideration of local infrastructure and solid waste goals.

3.12.2.2 UNIVERSITY OF CALIFORNIA

UC Sustainable Practices Policy

The UC Sustainable Practices Policy has been updated since certification of the 2018 LRDP EIR with the most recent version becoming effective in April 2024 (UC 2024). Portions of the UC Sustainable Practices Policy most directly related to public utilities and services include green building design, clean energy, water sustainability, and zero waste initiatives.

The policies related to public utilities and services remain similar to those described in the 2018 EIR, except to adjust reduction goals for water consumption and waste. The current UC Sustainable Practices Policy requires 20 percent of the natural gas historically combusted on-site to be biomethane by 2025 and halts the use of biomethane by 2040. The UC Sustainable Practices Policy also requires goals towards zero waste. The minimum compliance for zero waste is defined as a reduction in per capita municipal solid waste generation of 25 percent from 2015/2016 levels by 2025 and 50 percent from 2015/2016 levels by 2030, in addition to a diversion of 90 percent of municipal solid waste from landfills. The UC Sustainable Practices Policy additionally states that the UC system prohibits the sale, procurement, or distribution of packaging foam and is committed to the reduction and elimination of single-use items in line with the University's and the State of California's Zero Waste goals (UC 2024). For water systems, UC campuses have a goal to reduce water consumption 36 percent by 2025, when compared to a three-year average baseline of 2005 through 2006. More stringent goals may be set by campuses who have achieved these goals.

3.12.2.3 UC SAN DIEGO

UC San Diego Zero Waste Plan

UC San Diego's Zero Waste Plan was last updated in September 2019, following certification of the 2018 LRDP EIR. The plan summarizes UC San Diego's zero waste recommendations, which include reduction, reuse, diversion, and communications recommendations to be implemented. The Zero Waste Plan has not been revised since 2019, but an update is in process.

UC San Diego Storm Water Management Plan

The UC San Diego Storm Water Management Plan has been developed to identify pollutant sources affecting the quality of stormwater discharges, develop best management practices to prevent their discharge, and ensure the implementation of measures identified in the plan. The plan addresses pollutants such as sediment, metals, trash, oil, bacteria, hazardous materials, pesticides, and fertilizers. The plan is reviewed annually to include changes to the campus stormwater systems,

and BMPs are updated when monitoring or other regular assessments indicate a change to treatment is needed (UC San Diego 2024).

3.12.3 PROJECT IMPACTS AND MITIGATION

3.12.3.1 ISSUE 1 — NEW UTILITIES FACILITIES

Utilities and Service Systems Issue 1 Summary

Would implementation of the Update to the 2018 LRDP require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

2018 LRDP EIR Significance Conclusion:	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	Yes.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion:	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update:	Downstream Sewer Assessment (Util-1), Downstream Waste Water Capacity (Util-2).

Summary of Analysis in the 2018 LRDP EIR

Issues 2 and 3 of Section 3.15 of the 2018 LRDP EIR concluded that new and expanded water, wastewater, and storm water infrastructure would be required. These include water and wastewater pipelines, and storm water drainage infrastructure, some of which could cause significant construction-related environmental effects. Infrastructure could result in potentially significant impacts related to construction-related air quality, biological resources, hazards and hazardous materials, and noise and vibration issues. These future facilities and infrastructure would be developed as individual projects or as part of other development within the UC San Diego campus, consistent with the proposed Update to the 2018 LRDP.

In the event that physical impacts to sensitive resources would occur as a result of any such project (resulting in secondary environmental effects), appropriate project-specific mitigation would be developed as part of the subsequent CEQA review based on the mitigation framework contained in the 2018 EIR. Therefore, no significant impacts related to new or expanded water or wastewater infrastructure would occur.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated increases in population, development locations, and development densities have changed since preparation of the 2018 LRDP EIR, and revisions to the 2018 LRDP EIR are necessary. Updated utility studies for water, wastewater, storm water, and sewers have been provided to address these infrastructure issues related to changes from implementation of the Update to the 2018 LRDP.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

The UC Sustainable Practices Policy has been revised since the certification of the 2018 LRDP EIR, and there are new policies to be considered in this analysis.

Standards of Significance

Since certification of the 2018 LRDP EIR, changes to Section XIX, Utilities and Service Systems, of the Appendix G guidelines have been made which account for the changes to the issue areas presented in the Update to the 2018 LRDP SEIR. These standards of significance were previously identified in the 2018 LRDP EIR under Issues 2 and 3 in Section 3.15. Issues 2 and 3 asked whether implementation of the 2018 LRDP would require or result in the construction of new water, wastewater treatment, or storm water drainage facilities or expansion of existing facilities which could cause significant environmental effects. Revisions to Appendix G have expanded the significance thresholds to also consider the impacts of electric power, natural gas, or telecommunications facilities, and to expressly include the impacts of facility relocation. Energy use is discussed separately in Section 3.5 of this SEIR.

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage; electric power; natural gas; or telecommunications facilities, the construction of which could cause significant environmental effects.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

As discussed above, the 2018 LRDP identified the need for additional utilities infrastructure for water, wastewater, and storm water to serve the UC San Diego campus. This section is updated to reflect the population, development locations, and development densities proposed under the Update to the 2018 LRDP. The analysis below is based on updated demand identified in the master utility planning studies generated to address future development associated with the Update to the 2018 LRDP.

Impact Analysis

Implementation of the Update to the 2018 LRDP would result in the construction of 8.3 million GSF of net new development on-campus above the 2018 LRDP projection, including 12,780 net new

resident housing beds, and serving a campus population of 96,300 (an increase of 30,700 persons above the 2018 LRDP projection). This increase in population and development would lead to a direct increase in water use, wastewater flows, solid waste, and energy use. Increased development would lead to changes in storm water drainage flows.

Water Infrastructure

The projected increase in demand for water associated with proposed implementation of the Update to the 2018 LRDP is outlined below under Issue 2, Water Supply Availability. Increased development requiring additional supply would have the potential to require the construction of new or expanded water facilities. To determine whether construction of new or expanded water facilities would be required to support the proposed Update to the 2018 LRDP, the campus water system was tested as part of a Domestic Water Study (Latitude 33 2025b). Taking into consideration the existing campus water infrastructure and the increased water demand associated with the proposed Update to the 2018 LRDP, the Utilities Study evaluated the residual pressure and velocity of each of the six campus water systems. To do so, the evaluation analyzed anticipated development through the proposed Update to the 2018 LRDP horizon year by putting increasing flow rate demands on the system.

The Utility Study concluded that, in general, the UC San Diego private domestic water system is adequately sized to handle maximum day and peak hour flows upon buildout of the Update to the 2018 LRDP. Overall, the typical daily water demands yield pressures and velocities would fall within the acceptable criteria range (Latitude 33 2025b). Testing of the system in the study's model required inputs of the maximum daily demand and a fire flow scenario where additional water flows would be placed on the system during emergencies. The water systems were modeled across various time frames to determine if there were deficiencies in velocity and pressure. Each campus pipe segment was analyzed against the City's 2013 Water CIP Guidelines and Standards. These standards have been used to consider maximum static pressure, residual water pressure, and velocity (Latitude 33 2025b).

However, several portions of the existing water system require upgrades to comply with fire flow redundancy requirements in the existing condition and/or would not be able to handle fire flows after implementation of new development associated with future development associated with the proposed Update to the 2018 LRDP. The study further indicated that, to accommodate the planned expansion over the planning horizon of the proposed Update to the 2018 LRDP, some internal water mains would be realigned, extended, or upsized. The recommendations contained in the Master Utilities Planning Study and identified below were made to provide either critical, recommended, or redundancy upgrades in accordance with City of San Diego standards.

The following is a list of critical water service system improvements recommended to address water flows associated with development under the Update to the 2018 LRDP. The full description of each recommended improvement required under future conditions associated with the implementation of the proposed Update to the 2018 LRDP, and other recommended upgrades, are provided in the Domestic Water Study (Latitude 33 2025b).

West Campus

- The existing 8-inch diameter water main on the west side of Thurgood Marshall College (within Scholars Drive North, south of Pangea Drive) should be upsized to a 10-inch diameter water main and continue the main south to Exploration Drive. The current 8-inch

diameter loop south of Marshall Upper Apartments should be removed to allow for future development and a replacement loop would be required to maintain adequate velocities.

- A new 12-inch diameter water main from Voigt Drive to Pepper Canyon Drive would be required to support future development. The existing 12-inch main from Lyman Avenue should remain for redundancy.

- To support future development in the Health Sciences West area of campus, a 12-inch diameter water main through Villa La Jolla Drive connecting to an existing 12-inch diameter water main should be added to increase redundancy. Alternatively, upsizing of the 8-inch diameter water mains throughout Health Sciences West to 12-inch diameter water mains would allow for a 12-inch diameter loop.

East Campus

- To support future development in East Campus, the upsizing of an 8-inch diameter water main in Miramar Street to a 12-inch diameter water main would maintain adequate velocities. An existing 10-inch diameter water main should be continued through any new development in the Mesa housing area to support additional redundancy. The existing 8-inch diameter water main that services the east side of the Central Mesa Apartments should remain connected to the new 10-inch diameter water main.

In addition to the specific improvements listed above, other water infrastructure, including water meters, pressure reducers, fire hydrants, and reclaimed water pipelines, may also be installed in the future to support development occurring under the Update to the 2018 LRDP. These improvements would be designed and planned during the planning of future projects.

Wastewater Infrastructure

Implementation of the Update to the 2018 LRDP would increase the amount of on-campus building space and campus population, which would result in the generation and discharge of additional wastewater. As part of the Master Utilities Planning Study conducted for the Update to the 2018 LRDP, calculations of future campus wastewater demand were completed which assume that the increase in wastewater demand would be proportional to the projected population increase. Thus, the anticipated future average daily wastewater flow would be approximately 4.01 MGD in 2040, resulting in a 0.25-MGD increase over the 3.76 MGD projection for the buildout of the 2018 LRDP (Latitude 33 2023b).

Wastewater Treatment

Wastewater discharged from campus would ultimately require treatment at the PLWTP, the municipal treatment facility operated by the City. As described in Section 3.12.1.2, the PLWTP currently treats approximately 155 MGD of wastewater and has the capacity to treat up to 240 MGD. In addition, it is anticipated that the amount of wastewater discharged from PLWTP will be reduced by over 50 percent by 2040 due to implementation of the Pure Water San Diego (City 2024b). Because the forecasted amount of wastewater is anticipated to be lower in 2040 than today, and because the PLWTP is not nearing its capacity, it can be concluded that the PLWTP would have more than adequate capacity to receive and treat an additional 0.25 MGD of average daily wastewater from UC San Diego associated with implementation of the Update to the 2018 LRDP.

Wastewater Conveyance

Future flows from development associated with the proposed Update to the 2018 LRDP would require improvements and additions expanding the existing sewage service system. Sewage flows within campus would be generated within separate basins, but the flows from multiple basins would combine to various conveyance pipelines within campus before removal from campus. Each pipeline can handle a maximum amount of sewage flows before reaching capacity.

The Sewer Study conducted for the project concluded that total sewage flows within Sewer Basins 100, 200, 300, 400, and 500 would converge on an existing 21-inch diameter campus sewer main crossing La Jolla Village Drive. This 21-inch diameter sewer main then connects further south at Gilman Drive to the City's UCSD Trunk Sewer, a downstream 24-inch diameter sewer main. The capacity of the City's downstream 24-inch diameter sewer main (UCSD Trunk Sewer), which also collects sewage flows from additional campus basins and off-site development, is not confirmed to be sufficient for future flows collected from existing and future development from both UC San Diego and nearby neighborhoods within the City. Increases in sewage flows associated with the Update to the 2018 LRDP would therefore contribute to an exceedance of sewage flows for the existing 24-inch diameter sewer main (UCSD Trunk Sewer) operated by the City.

In addition to the capacity exceedances at the City's downstream 24-inch diameter sewer main (UCSD Trunk Sewer), other improvements would be recommended throughout campus. The following is a list of internal wastewater system improvement recommendations to address internal flows within the campus. The full description of each recommended improvement required under future conditions associated with the implementation of the Update to the 2018 LRDP, and other recommended upgrades, are provided in the Domestic Water Study (Latitude 33 2025b).

West Campus

<u>Basin 100</u>

- A new 10-inch diameter sewer line should be installed within Scholars Drive roadway to two sewer stubs at the North Torrey Pines Living and Learning Neighborhood.

- The existing 8-inch diameter sewer lines connecting to the Central Utilities Plant should be upsized to 10-inch diameter sewer lines to support additional blowdowns from the facility.

<u>Basin 300</u>

- The existing 8-inch diameter sewer line south of Pepper Canyon East area should be upsized to 12-inches and a 12-inch diameter sewer main constructed to serve new development in the area.

- Sewer mains at Warren College student housing area should be upsized to accommodate future development.

- A new lateral should be added to accommodate expansions of Canyonview Recreation Center, which may need a reconstruction of an existing 8-inch diameter sewer line.

East Campus

Basin 600

- To determine routing of additional flows, a downstream sewer study on the City's system should be completed to assess future development of the Mesa Housing area on the City's existing 18-inch diameter sewer main.

Summary of Water and Wastewater Impacts

During the planning and design phases for individual projects under the Update to the 2018 LRDP, a review by UC San Diego Campus Planning, Capital Program Management (CPM), FM, and Environmental, Health and Safety staff (as applicable) would be required for development projects to ensure utility infrastructure is appropriately considered. UC San Diego regularly evaluates and upgrades its utility infrastructure and distribution systems serving the campus to ensure adequate facilities and services. The University maintains and operates most of its infrastructure and service systems independent of local jurisdictions. This provides the campus with a higher degree of control over the operation of these systems allowing the campus to be strategic with its systems management to respond to ongoing infrastructure upgrades and address sustainability objectives. Utility infrastructure improvements on campus are advanced by either a funded capital building project or may be implemented as stand-alone projects. Engineering staff from Capital Program Management and FM would be engaged early in the feasibility phase of individual projects to ensure that necessary utilities infrastructure needs are identified and incorporated into the future projects' scope.

As part of this process, the Campus Planner would request that the UC San Diego Project Manager and/or Engineer consult the Master Infrastructure Plan (MIP) to identify capacity constraints and determine whether system improvements would be required to support the project at the sites being considered. If a project falls outside the scope of the MIP's planned capacity at a chosen site, it would be flagged. Upon selection of the site, additional utility studies and an addendum to the MIP may be required and would be the responsibility of the project and assigned Project Manager. At a minimum, projects would maintain infrastructure system functions and incorporate measures to address any inadequacies related to infrastructure systems.

During project design, the UC San Diego Project Manager, Engineers, and EH&S staff would review the design and construction plans to ensure infrastructure planning efforts are appropriately captured by the project.

While the anticipated campus growth under the Update to the 2018 LRDP would require construction of new, relocated, and expanded potable and recycled water and wastewater infrastructure, including the recommended improvements listed above from the master utility planning studies, the majority of the new/expanded infrastructure would be constructed in existing roads or other developed areas of campus. Where installation of the recommended water and wastewater system improvements would involve the limited disturbance of undeveloped areas or sensitive resources, they could result in potentially significant impacts related to construction-related air quality (criteria pollutants and toxic air contaminants), biological resources, hazards and hazardous materials (disruption of emergency evacuation routes) and noise/vibration (near noise-sensitive land uses or vibration-sensitive equipment) as discussed in Sections 3.2, 3.3, 3.7, and 4.0 of this SEIR. Impacts would be subject to mitigation measures identified in those sections, as applicable.

In coordination with project demand as indicated in the underlying technical studies, the recommended water or wastewater facilities could be developed as an individual project(s) or in combination with academic, residential, administrative, or other development consistent with the proposed Update to the 2018 LRDP. If physical impacts to sensitive resources would occur as a result of any such project (resulting in secondary environmental effects), the appropriate project-specific mitigation would be applied as part of the subsequent CEQA review based on the mitigation framework contained in this SEIR. Therefore, implementation of the proposed Update to the 2018 LRDP would require the construction of new and expanded water and wastewater infrastructure, some of which could cause significant construction-period environmental effects addressed in other sections of this SEIR. Although significant impacts related to the construction or relocation of new or expanded water infrastructure would occur, there is no new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR. As described above, impacts related to wastewater would occur due to an exceedance of City sewer main capacity, and mitigation would be required.

Storm Water Infrastructure

Similar to the 2018 LRDP, growth under the Update to the 2018 LRDP would occur primarily through new construction and targeted redevelopment. Modifications to previously developed areas, undisturbed areas, existing landscaping, parking, and other hardscape features would occur. These modifications would result in changes to drainage patterns. As described in the Drainage Study prepared for the Update to the 2018 LRDP, the Update primarily proposes redevelopment on existing developed areas; repurposing these existing developments such as parking lots or existing structures would limit increases of impervious areas on campus that would help reduce runoff rates (Latitude 33 2025c). Furthermore, UC San Diego would continue to implement the goals, policies, and measures identified in the campus's Storm Water Management Plan to reduce and lessen runoff (UC San Diego 2024). UC San Diego would use measures such as low impact design features to lower the peak flow rates and increase the amount of pervious surface area, as increased development may increase campus runoff overall (Latitude 33 2025).

Since impervious surfaces do not allow percolation of water down into the soil, a change in the amount of impervious surfaces would result in changes to the volume of storm water discharged from individual project sites or the campus as a whole into the storm drain system. If increases occur, they could exceed the capacities of existing storm water facilities, requiring construction of detention basins or larger conveyance facilities. Regional water quality devices, site design, source control, and treatment control BMPs would be implemented as feasible in major drainage basins to centralize storm water treatment. Centralizing storm water treatment for multiple projects in a single drainage basin may allow for the use of less water treatment infrastructure. The campus' Storm Water Management Plan identifies BMPs to be implemented for post-construction storm water management purposes. These include site design measures for projects creating 2,500 GSF or more of impervious area and low impact development design standards for projects that create 5,000 GSF or more of impervious area.

Prior to construction of individual future projects, the UC San Diego Campus Planner would consult the MIP Hydrology Study and Project Managers and Engineers to determine whether the existing storm drain infrastructure is adequate to serve the project. If the project is served by on-site or downstream infrastructure identified as deficient by the MIP Hydrology Study, the Project Manager would identify opportunities to correct those deficiencies as part of project implementation. Where projects would develop raw land sites or be located directly adjacent to raw land, projects would incorporate measures to address any adverse downstream impacts. The UC San Diego CPM Design

Guidelines and UC San Diego Storm Water Management Program would continue to provide standards for all projects that create or replace impervious surfaces to avoid flooding during storms and maintain downstream water quality.

UC San Diego requirements include the implementation of site design, source control, and treatment control BMPs to prevent the volume of storm water discharged from individual project sites or the campus as a whole from exceeding pre-project volumes. The future storm water BMPs could be developed as an individual project or in combination with academic, residential, administrative, or other development consistent with the proposed 2018 LRDP. Individual projects under the Update to the 2018 LRDP or individual BMP projects would be subject to the mitigation measures to address construction impacts identified in this SEIR prior to consideration for approval. Details of exact locations, sizes, and other specifics of these regional storm water BMPs to be developed during required project-level design evaluations. In the event that physical impacts to sensitive resources in undeveloped areas of campus would occur as a result of construction of new storm water facilities or expansion of existing facilities, appropriate project-specific mitigation would be implemented as part of the subsequent CEQA review using the mitigation framework contained in this SEIR.

Therefore, implementation of the Update to the 2018 LRDP would not result in new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR, in terms of whether it would require or result in the construction or relocation of stormwater drainage facilities, the construction of which would result in significant environmental impacts. Therefore, no significant impacts related to new or expanded stormwater drainage infrastructure would occur and would not result in new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR.

Energy Infrastructure (Electricity and Natural Gas)

Implementation of the proposed Update to the 2018 LRDP would result in an increased energy demand due to the increased campus building space and population. In addition, the Update would facilitate changes to the existing energy infrastructure on campus that would take place due to ongoing policies toward energy efficiency and decarbonization.

As part of campus-wide goals, UC San Diego is undertaking the goal of decarbonization of the University's energy use and recently prepared a campus-wide Decarbonization Study (Salas O'Brien 2024). As described in Section 3.6, Greenhouse Gas Emissions, of this SEIR, mitigation measure GHG-1A requires decarbonization of the Central Utilities Plant before 2040. This would involve replacement of gas-fired heating systems with electric air and water source heat pumps at the Central Utilities Plant. As described in Section 3.5, Energy, this decarbonization would lead to an increase in electricity use to offset the energy currently used through natural gas. Through this decarbonization process, the use of natural gas and the need for natural gas infrastructure would be significantly reduced over the course of the Update to the 2018 LRDP timeframe. Instead, increased electricity use would be required to both implement the decarbonization process and supply future development under the Update.

To address the increased development of West Campus under the Update, an additional electrical substation and connections to nearby existing infrastructure is proposed. The electrical substation would be located within the existing Open Space Preserve area north of Hopkins Drive and south of Genesee Avenue. The construction of this electrical substation along with other projects on campus would also likely require construction of underground utilities to route electricity infrastructure to

areas where they are needed. Individual projects implemented under the Update to the 2018 LRDP would require coordination between the UC San Diego Campus Planner and Project Managers and Engineers to determine whether the existing electricity infrastructure is adequate to serve the project. If physical impacts were to occur as a result of construction of new electricity infrastructure, appropriate project-specific mitigation relating to construction impacts would be implemented as part of the mitigation framework contained in this SEIR.

Therefore, implementation of the Update to the 2018 LRDP would not require or result in significant impacts relating to the relocation or construction of new or expanded electrical power facilities following implementation of applicable mitigation measures identified in this SEIR, and therefore no significant impacts related to new or expanded electrical power facilities would occur and no new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR would result.

Telecommunications Infrastructure

Implementation of the proposed Update to the 2018 LRDP would increase the amount of on-campus building space and campus population, which would result in increased demand on telecommunications infrastructure. Future demand for desk phones and payphones may wane in the future due to the continued prevalence of cellular phone use, but their availability will not be reduced due to implementation of the Update to the 2018 LRDP. Similarly, UC San Diego will maintain emergency call boxes, wireless high-speed internet, and other telecommunications services in the future. Improvements would be made to handle telecommunications infrastructure as individual projects are developed. These improvements would not be expected to affect off-campus telecommunications infrastructure. Similarly, cellular phone service would be maintained by individual private companies in response to increases in demand throughout the region. The UC San Diego campus is covered by multiple cellular phone networks and would continue in the future. Therefore, no significant impacts related to new or expanded telecommunications infrastructure would occur and no new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR would result.

Level of Significance Before Mitigation

Impacts related to the construction or relocation of potable water, storm water, energy, and telecommunications infrastructure would be less than significant, consistent with the conclusion in the 2018 LRDP EIR.

The capacity of the City of San Diego's downstream 24-inch trunk sewer main (UCSD Trunk Sewer) is not confirmed to be sufficient for future flows from development associated with the Update to the 2018 LRDP and existing and future development from UC San Diego and nearby City neighborhoods. Therefore, impacts due to the construction of wastewater conveyance infrastructure would be significant.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Mitigation measures related to other issue areas, such as biological resources, cultural resources, noise, and air quality would be implemented to reduce construction impacts related to

implementation of future developments under the Update to the 2018 LRDP, including the installation of utilities infrastructure.

No mitigation specific to utilities was required.

New mitigation measures for the Update to the 2018 LRDP:

To mitigate impacts of wastewater infrastructure improvements to the City's 24-inch diameter trunk sewer main (UCSD Trunk Sewer) to less than significant, mitigation measures Util-1 and Util-2 would be required.

Util-1 **Downstream Sewer Assessment.** Within one year following approval of the Update to the LRDP and prior to proposed development within Sewer Basins 100, 200, 300, 400, or 500, a sewer assessment shall be completed to analyze the capacity of downstream sewer mains owned and operated by the City of San Diego. Specifically, UC San Diego shall conduct an assessment, using applicable City of San Diego guidelines, of the City's downstream public sewer system infrastructure, primarily the City's 24-inch diameter sewer main (UCSD Trunk Sewer) within Gilman Drive. This assessment shall consider potential capacity constraints and ability to serve buildout of the Update to the LRDP in conjunction with existing and anticipated development within the City of San Diego. If the additional sewage flows expected from implementation of the Update to the LRDP exceed the existing or planned capacity of the downstream City of San Diego sewer main or other associated sewer infrastructure, Util-2 shall be implemented.

Util-2 **Downstream Wastewater Capacity**. If the sewer study required by Util-1 indicates inadequate downstream sewer main capacity of the City's 24-inch diameter public sewer trunk main (UCSD Trunk Sewer) within Gilman Drive to serve the Update to the 2018 LRDP, additional wastewater capacity for City of San Diego mains would be required. Prior to the approval of an individual development project or projects within Sewer Basins 100, 200, 300, 400, or 500 that would increase sewage flows over the maximum rate determined by the sewer study described in Util-1, UC San Diego shall ensure downstream capacity is available. To provide the necessary capacity in downstream City mains, one or both of the following actions may be implemented:

- UC San Diego will coordinate with the City of San Diego on upsizing the City of San Diego's UCSD Trunk Sewer and/or other affected sewer infrastructure to ensure that adequate capacity is available to accommodate projected flows associated with implementation of the Update to the 2018 LRDP.

- UC San Diego will construct a wastewater treatment plant to offload a portion of its sewer flows. The wastewater treatment plant will be located within UC San Diego's La Jolla campus, upstream from affected City sewer infrastructure to reduce total campus flows leading to downstream City mains.

Level of Significance After Mitigation

For potable water, storm water, energy, and telecommunications infrastructure, impacts due to construction of new or relocated facilities would remain less than significant without mitigation, similar to the 2018 LRDP EIR. For wastewater infrastructure, impacts would be less than significant following implementation of mitigation measures Util-1 and Util-2.

3.12.3.2 ISSUE 2 — WATER SUPPLY AVAILABILITY

Utilities and Service Systems Issue 2 Summary

Would implementation of the Update to the 2018 LRDP have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

2018 LRDP EIR Significance Conclusion:	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	No mitigation is required.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

Section 3.15.3.4 of the 2018 LRDP EIR concluded that sufficient water supplies from existing entitlements and resources would be available to serve future growth anticipated under the 2018 LRDP. The WSA Report prepared for the 2018 LRDP concluded that the water demand projections for the proposed 2018 LRDP are accounted for in the regional water resource planning documents of the City, Water Authority and MWD. The water resource planning documents identified current and future water supplies, as well as actions necessary to develop the future water supplies, needed to meet the demands of the 2018 LRDP and the demands of the other existing and planned development projects within the PUD service area. The finding made in the WSA Report stated that sufficient water supplies would be available during normal, single-dry, and multiple-dry water years over a 20-year projection ending in 2040. Impacts were determined to be less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated increases in population, development locations, and development densities have changed since preparation of the 2018 LRDP EIR, and revisions to the 2018 LRDP EIR are necessary.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Since implementation of the 2018 LRDP, forecasted demand for water in the region has changed. As described in Section 3.12.1.1, the Water Authority's most recent 2020 UWMP forecasts for 2040 demand are 15 percent lower than what was analyzed in the 2018 LRDP. Similarly, the City's 2015 UWMP forecast is 23 percent lower in 2040 compared to what was analyzed in the 2018 LRDP.

Standards of Significance

Since certification of the 2018 LRDP EIR, changes to Section XIX, Utilities and Service Systems, of the Appendix G guidelines have been made which account for the changes to the issue areas presented in the Update to the 2018 LRDP SEIR. Although the organization of the issue areas have changed due to updates to the Appendix G guidelines, the standards of significance remain the same. The standards of significance for water supply were previously identified in the 2018 LRDP EIR under Issue 4 in Section 3.15. Issue 4 of the 2018 LRDP EIR asked whether the project would result in insufficient water supplies available to serve the project from existing entitlements and resources, or whether it would require new or expanded entitlements. The revised Appendix G guidelines focus on sufficiency of water supplies as they relate to various drought scenarios.

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would result in insufficient water supplies available to serve the Update to the 2018 LRDP and reasonably foreseeable future development during normal, dry, and multiple dry years.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

A WSA was provided for the 2018 LRDP, which addressed future water demand projections and conclusions about sufficient supply. This section is updated to reflect the additional water demand expected to result from the Update to the 2018 LRDP and compare with the demand previously identified by the WSA. The analysis below is based on updated demand identified following implementation of the Update to the 2018 LRDP.

Impact Analysis

The finding made in the 2018 LRDP's WSA Report stated that sufficient water supplies would be available during normal, single-dry, and multiple-dry water years over a 20-year projection ending in 2040. Although the horizon year of the Update to the 2018 LRDP falls within this 20-year projection window, and implementation of the Update to the 2018 LRDP would continue the recommendations of the WSA report, the demand under the Update would be higher than what was anticipated in the 2018 LRDP.

The 2018 LRDP EIR identified the total water demands of the 2018 LRDP to be 4.04 MGD and 4,525.5 AFY by 2040. These estimates were then incorporated into the City's 2020 UWMP, and as described above, there is sufficient water planned and projected to supply the 2018 LRDP's estimated annual average usage. The Update to the 2018 LRDP, however, would increase campus

population by approximately 47 percent by 2040, as compared to the 2018 LRDP. The total estimated water demands of the proposed Update to the 2018 LRDP would increase as well. The total estimated water demand in 2040 due to the Update would be 4.45 MGD, or 4,984.6 AFY (Latitude 33 2024). This represents an increase of approximately 110 percent from what was analyzed for 2040 in the 2018 LRDP EIR.

Because the 2018 LRDP EIR assessed the water supply and forecasted demand on the 2015 UWMP's, the campus water supply required for the 2018 LRDP is accounted for in the reduced anticipated demands from the City and Water Authority's forecasts in the 2020 UWMPs. As described in Section 3.12.1.1, the Water Authority's 2015 UWMP forecasted a regional demand for 718,773 AFY 2040 compared to 614,235 forecasted for the same year in the 2020 UWMP. The City's 2015 UWMP forecasted 246,801 AFY of potable water demand in 2040 compared to 190,941 forecasted for the same year in the 2020 UWMP. This is a reduction of 104,538 AFY from the two Water Authority UWMPs and 55,860 from both City UWMPs. As stated above, the Update to the 2018 LRDP would add an additional 4,984.6 AFY of demand by 2040. This increase in campus demand would be accounted for in the forecasted reduced demands found in both UWMPs.

In addition, the campus intends to utilize treated water produced by the City's Pure Water program to further reduce its consumption of potable water. Therefore, although the campus demand for potable water would increase as a result of implementation of the Update to the 2018 LRDP, demand over time would likely continue to be reduced through these and other conservation practices integrated into new construction and existing programs.

In addition, per the UC Sustainable Practices Policy, UC San Diego requirements, and LEED-certified measures, the following standard practices on the campus would be implemented:

- Reduce growth-adjusted potable water consumption 36 percent by 2025;
- Develop and maintain a Water Action Plan that identifies long-term strategies for achieving sustainable water systems;
- Achieve at least five points within the available credits in LEED-BD+C's Water Efficiency and Sustainable Sites: Rainwater Management categories in all new building projects;
- Install water efficient plumbing fixtures in all new development;
- Replace aging infrastructure with water efficient fixtures;
- Install aerators in laboratory sinks;
- Install drought tolerant and low water vegetation
- Replace sprinklers with high-efficiency rotating nozzles;
- Capture and reuse water from fire-sprinklers;
- Conduct hydrant testing for use in the Central Utilities Plant cooling towers; and
- Collect condensation from heating and air conditioning units, reverse osmosis system wastewater, and cooling towers for reuse in toilet flushing and irrigation.

UC San Diego has several campus organizations, such as the AQUAholics Anonymous and Econauts groups, that contribute to efficient water use education and outreach as well as collaborating with local municipalities for on-campus outreach events.

For these reasons, the implementation of the Update to the 2018 LRDP would not result in insufficient water supplies available to serve the project from existing entitlements and resources, nor require new or expanded entitlements and no new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR would result.

Level of Significance Before Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, similar to the 2018 LRDP EIR.

3.12.3.3 ISSUE 3 —WASTEWATER TREATMENT CAPACITY

Utilities and Service Systems Issue 3 Summary

Would implementation of the Update to the 2018 LRDP result in a determination by wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demands in addition to the provider's existing commitments?

2018 LRDP EIR Significance Conclusion:	Less than Significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	Yes.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Downstream Sewer Assessment (Util-1), Downstream Waste Water Capacity (Util-2).

Summary of Analysis in the 2018 LRDP EIR

As described in Section 3.15.3.1 of the 2018 LRDP EIR, the 2018 LRDP was found not to result in increased wastewater flows that would cause exceedance of regional treatment capacity. Impacts would be less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated increases in population, development locations, and development densities have changed since preparation of the 2018 LRDP EIR, and therefore revisions are necessary.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to the circumstances under which the Update to the 2018 LRDP is undertaken or new information of substantial importance.

Standards of Significance

Since certification of the 2018 LRDP EIR, changes to Section XIX, Utilities and Service Systems, of the Appendix G guidelines have been made which account for the changes to the issue areas presented in the Update to the 2018 LRDP SEIR. These standards of significance were previously identified in the 2018 LRDP EIR under Issue 1 in Section 3.15. Issue 1 asked whether implementation of the 2018 LRDP Implementation of the 2018 LRDP would result in an exceedance of the City's treatment capacity to serve the project's projected demand. Revisions to the Appendix G significance thresholds have focused on wastewater treatment provider capacity to serve a project in addition to existing commitments.

Based on Appendix G of the CEQA Guidelines, implementation of the proposed Update to the 2018 LRDP may have a significant impact if it would result in an exceedance of the City's collection and treatment capacity, as the wastewater treatment provider that serves the project, to serve the proposed Update to the 2018 LRDP's projected demand in addition to the City's existing commitments.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

As discussed above, the 2018 LRDP identified the need for additional utilities infrastructure for wastewater to serve the UC San Diego campus. This section is updated to reflect the population, development locations, and development densities. The analysis below is based on updated demand identified in the Sewer Study prepared to address future development associated with the Update to the 2018 LRDP.

Impact Analysis

Implementation of the proposed Update to the 2018 LRDP would increase the amount of on-campus building space and the on-campus population. Such increases would result in the

generation and discharge of additional wastewater from the campus; the additional wastewater associated with implementation of the proposed Update to the 2018 LRDP would require conveyance by City pipes and ultimately treatment at the PLWTP, the municipal treatment facility operated by the City.

As identified in the 2018 LRDP EIR, the total average daily sewage flow for UC San Diego is 3.76 MGD with a peak hour flow of 11.32 MGD upon full buildout of the 2018 LRDP in 2035. To calculate for future campus wastewater demand for the Update to the 2018 LRDP, values for 2040 were calculated by reviewing existing building usage and using that data to generate an average gallons per day per square foot by building type (Latitude 2025a). These sewer generation rates were then applied to the proposed uses.

The projected future average daily wastewater flow in 2040 would be approximately 4.01 MGD and the future peak hour flow would be approximately 12.04 MGD (Latitude 33 2025a). This represents an increase of 0.25 MGD for average daily flows and 0.72 MGD for peak hour demand, as compared to what was analyzed for 2035 in the 2018 LRDP.

Wastewater Treatment

The PLWTP currently treats approximately 155 million gallons of wastewater per day from a 450-square mile area, which includes the UC San Diego campus. However, the PLWTP has the capacity to treat up to 240 million gallons of wastewater per day, or 65 million gallons per day more than it currently treats. In addition, it is anticipated that the amount of wastewater discharged from PLWTP will be reduced by over 50 percent due to implementation of the Pure Water San Diego project (City 2024b). Because the forecasted amount of wastewater is anticipated to be lower by 2040 than today, from both the Update and the PLWTP's existing commitments, and because the PLWTP is not close to reaching its capacity. Thus, it can be concluded that the PLWTP would have more than adequate capacity to receive and treat wastewater from UC San Diego associated with implementation of the Update to the 2018 LRDP and water conservation efforts would further reduce flow rates from the campus.

Wastewater Conveyance

As described above, implementation of the Update to the 2018 LRDP would increase average daily flows by 0.25 MGD and peak hour demand by 0.72 MGD, as compared to what was analyzed for 2035 in the 2018 LRDP. As described in Section 3.12.3.1, the Sewer Study concluded that the City's downstream 24-inch diameter trunk sewer line may not be sized adequately to service increased campus flows (Latitude 33 2025a).

Level of Significance Before Mitigation

Implementation of the Update to the 2018 LRDP would result in new or substantially more severe impacts than considered in the 2018 LRDP EIR because it would increase wastewater flows above the capacity of existing pipelines. For this reason, impacts to wastewater capacity under the Update to the 2018 LRDP are considered potentially significant.

Mitigation Measures

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

No mitigation was required.

New mitigation measures for the Update to the 2018 LRDP:

Mitigation measures Util-1 and Util-2 would be required to assess campus and downstream wastewater capacity and provide new infrastructure or improvements to existing infrastructure.

Level of Significance After Mitigation

Following implementation of mitigation measures Util-1 and Util-2, impacts to wastewater capacity would be less than significant.

3.12.3.4 ISSUE 4 — SOLID WASTE GENERATION

Utilities and Service Systems Issue 4 Summary

Would implementation of the Update to the 2018 LRDP generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

2018 LRDP EIR Significance Conclusion:	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion:	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts in Update:	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

As described in Section 3.15.5 of the 2018 LRDP EIR, growth proposed under the 2018 LRDP would increase the amount of municipal solid waste generated on the UC San Diego campus as more students are enrolled, more campus housing is constructed, and new facilities are constructed and operated. The majority of construction and demolition debris would be diverted due to the campus

commitment to LEED-certified facilities. The analysis concluded that although the Miramar and Otay Landfills were expected to close by 2035, the City demonstrated more than 15 years of permitted landfill capacity as required by the State's Integrated Waste Management Act. Due to UC San Diego's commitment to reduce solid waste generation and increase diversion rates, the 2018 LRDP EIR concluded that the 2018 LRDP would not result in inadequate capacity of solid waste facilities.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated increases in population, development locations, and development densities have changed since preparation of the 2018 LRDP EIR, and revisions to the 2018 LRDP EIR are necessary.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

With respect to campus programs and policies since the 2018 LRDP EIR was certified, no substantial changes to the campus' solid waste disposal conditions have occurred in which greater rates of refuse requiring disposal would be generated. The UC Sustainable Practices Policy requires an overall diversion of solid waste by 90 percent along with specific reductions in per capita waste by 2025 and 2030. Additional growth in population and construction has occurred during the intervening years which increased overall refuse was generated. Therefore, no changes in circumstances and no new information of substantial importance relative to this topic have been identified.

Standards of Significance

Since certification of the 2018 LRDP EIR, changes to Section XIX, Utilities and Service Systems, of the Appendix G guidelines have been made which account for the changes to the issue areas presented in the Update to the 2018 LRDP SEIR. These standards of significance were previously identified in the 2018 LRDP EIR under Section 3.15.5, CEQA Issues Where There is No Potential For an Impact. The wording of this threshold is identical to the threshold used here.

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it generates solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The 2018 LRDP identified the solid waste reduction goals set by the UC and UC San Diego, including the UC Sustainable Practices Policy and UC San Diego's Zero Waste Plan. It is noted that although the UC is not subject to state or local regulations pertaining to solid waste management and diversion, the UC has adopted and is implementing reduction measures similar to those imposed on local agencies to do their part in sustainably managing and reducing waste. Although UC San Diego's non-recyclable and non-compostable solid waste is disposed at the Miramar Landfill, the

analysis below also accounts for the current projected landfill capacity for Sycamore Landfill and Otay Landfill.

Impact Analysis

Growth proposed under the Update to the 2018 LRDP would increase the amount of municipal solid waste generated on the UC San Diego campus over time as more students are enrolled, more campus housing is constructed, and new campus facilities are constructed. Solid waste would continue to be generated during both the construction of proposed facilities and the operation of campus development beyond the Update to the 2018 LRDP planning horizon. It is anticipated that most construction phase debris would be diverted as is currently the case due to the campus commitment to at least LEED Gold-certified facilities. UC San Diego buildings under the Update to the 2018 LRDP would be required to prove source reduction, reuse and salvage of building materials, and other solid waste-reducing actions to achieve credits toward LEED Gold or Platinum status.

Because of increased diversion rate requirements, disposal quantities headed to local landfills are anticipated to be substantially decreased. Waste diversion and disposal from the campus occurs at the Miramar Landfill and Miramar Greenery and could shift to other permitted solid waste facilities, such as Sycamore Landfill or Otay Landfill, in the future. As noted under Section 3.12.1.3 of this SEIR, the City can demonstrate it has more than 15 years of permitted landfill capacity as required by the State's Integrated Waste Management Act. The City has landfill capacity until 2030 for Otay Landfill, 2031 for Miramar Landfill, and 2042 for Sycamore Landfill. This does not account for potential future landfill capacity extensions, as has occurred in the past for these facilities. In addition, individual projects located within the City are required to prepare Waste Management Plans, which would identify each project's solid waste impacts and provide methods to reduce operational and construction solid waste.

Regardless of where campus waste is disposed of, UC San Diego is committed to the UC Initiative of reducing solid waste disposal needs in the future, ultimately achieving its zero-waste goal. Students, faculty and staff at UC San Diego campus would continue to participate actively in the waste reduction and diversion efforts and programs established on campus. Under the direction of UC San Diego-administered programs, waste diversion rates of 45 percent, not including construction and demolition debris, currently exceed the City's own programs (estimated at 40 percent diversion by City Environmental Services Department [City 2013]). Waste diversion would be expected to increase as more LEED-certified structures are built and more waste reduction programs are introduced, while landfill disposal rates would correspondingly decrease during the planning horizon of the proposed Update to the 2018 LRDP. Therefore, implementation of the Update to the 2018 LRDP would not generate solid waste in excess of state or local standards or affect the capacity of local solid waste infrastructure. As disposal rates decrease, UC San Diego would help facilitate extending the lifespan on the City's landfill system and not impair the region's solid waste reduction goals. Thus, implementation of the Update to the 2018 LRDP would not result in inadequate capacity of solid waste facilities in the region such that construction of a new landfill or expansion of an existing landfill would be necessary and less than significant solid waste impacts are identified.

For these reasons, the Update to the 2018 LRDP would not result in new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Mitigation measures would not be required, consistent with the conclusions in the 2018 LRDP EIR.

Level of Significance Before Mitigation

Impacts related to solid waste generation would be less than significant, similar to the 2018 LRDP EIR.

Mitigation Measures

No mitigation measures were included.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

3.12.3.5 ISSUE 5 — COMPLIANCE WITH SOLID WASTE REGULATIONS

Utilities and Service Systems Issue 5 Summary

Would implementation of the Update to the 2018 LRDP comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

2018 LRDP EIR Significance Conclusion:	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion:	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts in Update:	No mitigation is required.

Summary of Analysis in the 2018 LRDP EIR

As described in Section 3.15.3.5 of the 2018 LRDP EIR, the UC Sustainable Practices Policy set the goal that the UC system would divert 75 percent of its municipal solid waste from landfills by June 2012 with an ultimate goal of zero waste by 2020 (defined at a minimum of 90% diversion of municipal solid waste), in line with AB 939 and AB 341. The Zero Waste Plan required as part of the UC Sustainability Practices Policy applied to projects implemented as part of the 2018 LRDP. In addition, the campus-initiated food waste composting at Miramar Landfill would continue, in accordance with AB 1826 and SB 1383. Impacts would be less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

Anticipated increases in population, development locations, and development densities have changed since preparation of the 2018 LRDP EIR, and revisions to the 2018 LRDP EIR are necessary.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

The UC Sustainable Practices Policy has been updated with changes to goals towards zero waste, which include per capita reductions by 2025 and 2030, and an overall diversion of 90 percent of municipal solid waste from landfills.

Standards of Significance

Since certification of the 2018 LRDP EIR, changes to Section XIX, Utilities and Service Systems, of the Appendix G guidelines have been made which account for the changes to the issue areas presented in the Update to the 2018 LRDP SEIR. These standards of significance were previously identified in the 2018 LRDP EIR under Issue 5 in Section 3.15. The wording of Issue 5's significance threshold is identical to the threshold used here.

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it fails to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The 2018 LRDP identified the solid waste reduction goals set by the UC and UC San Diego, including the UC Sustainable Practices Policy and UC San Diego's Zero Waste Plan. It is noted that although the UC is not subject to state or local regulations pertaining to solid waste management and diversion, the UC has adopted and is implementing reduction measures similar to those imposed on local agencies to do their part in sustainably managing and reducing waste.

Impact Analysis

During pre-construction demolition, clearing/grubbing, and grading activities, the projects implemented under the proposed Update to the 2018 LRDP would produce excavated soils, green waste, asphalt/concrete, and other construction and demolition waste. The following types of demolition debris would likely be generated during construction: metals, concrete/asphalt, brick/masonry, masonry, wood, drywall, carpet/carpet padding, ceramic tile, roofing materials, doors, windows, and fixtures. Operations of new, renovated and expanded facilities would contribute additional non-recyclable/non-reusable waste which would be deposited at Miramar Landfill, after accounting for waste reduction and diversion. To minimize the amount of municipal solid waste destined for disposal, UC San Diego would continue and expand its campus-wide waste prevention and recycling programs.

Although the UC system is not obligated (but is encouraged) to adopt waste diversion goals that are in line with the state's goals established in AB 939 and AB 341, the UC Sustainable Practices Policy had previously set the goal that the UC system would achieve the goal of zero waste, which is defined as a reduction in per capita municipal solid waste generation of 25 percent from fiscal year 2015/2016 levels by 2025 and 50 percent from fiscal year 2015/2016 levels by 2030, in addition to a diversion of 90 percent of municipal solid waste from landfills (UC 2024). The university would help achieve these goals by incorporating solid waste reduction strategies for all new developments under the Update. This includes the reduction of construction and demolition waste by contractors generated during construction of new projects, the prioritization of waste reduction during procurement of new materials as outlined in the UC Sustainable Practices Policy, and the incorporation of composting and recycling infrastructure for new buildings on campus. Furthermore, the Zero Waste Plan required as part of the UC Sustainability Practices Policy applies to all facilities at the UC San Diego campus and sets forth particular standards and processes, which would not be affected by implementation of the Update to the 2018 LRDP.

In the future, UC San Diego would continue to implement, promote and improve the campus-wide comprehensive waste prevention, recycling and diversion programs. Annual reporting to the UCOP, as required by the UC Sustainability Practices Policy, would ensure the campus continues to broaden its waste management and diversion programs to monitor progress on existing programs and use those data to identify additional methods for reducing, capturing and diverting more of its municipal solid waste. In addition, the campus-initiated food waste composting at Miramar Landfill as early as 2010 and would continue to expand its participation in that program and other programs of their own, in accordance with AB 1826 and SB 1383.

Furthermore, although the UC is not subject to state or local regulations pertaining to solid waste management and diversion, the UC has adopted and is implementing reduction measures similar to those imposed on local agencies to do their part in managing and reducing waste in a sustainable fashion. The programs noted above would continue to expand as the UC San Diego campus population and development expands under the proposed Update to the 2018 LRDP. Therefore, UC San Diego would assist the state and local agencies in achieving their applicable solid waste management and diversion goals outlined in the applicable regulations by setting aggressive goals and advancing its methods for reducing solid waste disposed of at the local landfill system.

For these reasons, the Update to the 2018 LRDP would not result in new or substantially more severe significant impacts than what was identified in the 2018 LRDP EIR, in terms of compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

Level of Significance Before Mitigation

Impacts would remain less than significant without mitigation, similar to the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are anticipated for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

3.12.4 CUMULATIVE IMPACTS AND MITIGATION

Utilities and Service Systems Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative utilities and service systems impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Regional development could generate a cumulative demand for new, or an expansion of existing, water, waste water, or storm water, electrical, natural gas, or telecommunications facilities.	Less than significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with implementation of Util-1 and Util-2.
Regional development could generate cumulative demand beyond water supply availability.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Regional development could cumulatively affect wastewater treatment capabilities.	Less than significant.	Not cumulatively considerable.	Potentially significant.	Not cumulatively considerable with implementation of Util-1 and Util-2.
Regional development could impact compliance with solid waste regulations.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.

The study area for cumulative impacts on utilities and service systems is the service area for each utility that serves the campus. UC San Diego receives its public utilities and service systems from the City of San Diego, Water Authority, SDG&E, and multiple private telecommunications companies.

The cumulative setting for water treatment/distribution and wastewater collection/treatment infrastructure impacts is the UC San Diego campus and nearby City areas. The cumulative context for water supply is the City water service area. The cumulative context for solid waste is San Diego County and in particular the City landfill system, and the cumulative context for electricity and natural gas facilities is the service area for each utility. The cumulative effect of regional growth, in conjunction with campus growth under the Update to the 2018 LRDP, on utilities and service systems is discussed below.

New Utilities Construction

The 2018 LRDP EIR concluded that while new water, wastewater, and storm water facilities would be constructed as development occurs in built areas within the campus and in the City during the planning horizon of the proposed Update to the 2018 LRDP, impacts would be less than significant and the LRDP's contribution would not be cumulatively considerable.

Implementation of the Update to the 2018 LRDP would result in new utility improvements and facilities, the construction of which could result in significant physical impacts on the environment. These projects, either stand-alone utilities projects or larger projects that utility improvements might be associated with, would be subject to the mitigation measures identified in this SEIR prior to approval. Most environmental impacts associated with construction activities for utility infrastructure would be temporary and localized, including road closures, noise, and air quality impacts.

Except for some facilities, such as the electrical substation and potential wastewater treatment plant, new infrastructure or related facilities needed to accommodate community and campus growth would be constructed in already developed areas or roadways, and construction of additional utilities or facilities required under the Update would largely be located within campus boundaries. Any upsizing of off-campus utilities, such as sewer mains, would be coordinated with the City of San Diego to ensure adherence to City regulations and procedures. Cumulative projects would be required to comply with the City regulations and ordinances related to environmental impacts, including policies in the General Plan, CALGreen requirements, and CEQA review for future discretionary projects. In addition, on-campus projects under the Update would require the implementation of any applicable mitigation measures from the framework contained in this SEIR. Therefore, cumulatively significant impacts related to expansion of utility infrastructure are not expected and the Update's contribution to such impacts would not be considerable.

Water Supply

The City's potable water system relies on reservoirs, water treatment plants, and miles of transmission and distribution lines. In addition, the City operates a recycled water system containing two water reclamation plants, three recycled water storage facilities, and miles of transmission and distribution lines. The City PUD relies on purchased water from the regional wholesale water provider, the Water Authority, who in turn purchases imported water from MWD. As such, the City relies on long-term water resources planning documents of the Water Authority and MWD to support their own regional planning efforts on water supply.

The City prepares an UWMP (the most recent of which was completed in 2020) to evaluate whether there would be sufficient supplies to accommodate future growth and ensure long-term reliability for the region, including the identification of alternative water supply sources to alleviate the risk of unforeseen water shortages. The 2020 UWMP accounts for regional population growth and future supplies, including supply development, conservation and potable reuse.

To address regional demand, the City requires projects of a certain size to prepare WSAs, in accordance with SB 610/221, which considers new demands for potable water and whether those demands have been accounted for in the regional growth forecasts. Projects that are not contained in the regional growth forecasts are accounted for in the regional water supply plans through use of the accelerated forecasted growth (AFG) demand increment in the Water Authority's 2020 UWMP. The purpose of the AFG component of the demand forecast is to estimate, on a regional basis, additional demand associated with projects not yet included in local jurisdictions' General Plans and to plan for additional sufficient regional supplies to reliably meet the water demand of those projects (such as the proposed Update to the 2018 LRDP) (City 2018). The AFG assumed in the Water Authority's 2020 UWMP includes growth in residential housing development as part of its projections. This is derived from SANDAG's Series 14, version 17 Regional Growth Forecasts (Water Authority 2021).

During implementation of the proposed Update to the 2018 LRDP, the campus demand for potable water is projected to increase as noted above, while the population of the San Diego region is also expected to continue to increase. As described in Section 3.12.3.2, the 2018 LRDP's water demands were incorporated into the City's and Water Authority's 2020 UWMPs. In the intervening years, the forecasted regional demand for water has been reduced, as compared to what was analyzed in the 2018 LRDP. While the Update to the 2018 LRDP has not been incorporated into regional UWMPs or forecasts, the increase attributed to the Update would be a fraction of the decrease in forecasted demand between the 2015 and 2020 UWMPs for both agencies.

Table 3.12-1, *Projected Normal Supply and Demand Comparison*, compares the City's 2020 UWMP's projected normal year water supply (local and purchased/imports) to demands from existing and future developments over a 20-year projection from 2025 to 2045, with demands and supplies shown in AFY and given in five, five-year increments. As shown in the table, the estimated water supply will meet the City's projected water demand of 202,865 AF in 2025, which increases to 223,598 AF in 2040 for these developments. No water shortages or associated impacts are expected to occur. The UWMP also analyzed water demands under single-dry and multiple-dry year scenarios and determined that under both the single-dry and multiple-dry year scenarios, local water supplies are projected to remain relatively consistent from 2025 to 2040 (City 2021). Therefore, cumulatively significant water supply impacts are not anticipated in the region and no new or expanded entitlements are needed to satisfy projected demands.

Table 3.12-1
Projected Normal Supply and Demand Comparison

Normal Year Demands/ Supplies	Demand and Supplies (AFY)				
	2025	2030	2035	2040	2045
Water Demand (with wholesale and conservation)	**202,865**	**210,547**	**217,156**	**223,598**	**228,065**
Local Water Supplies					
Recycled Water (City service area only)	13,773	13,773	13,773	13,773	13,773
Pure Water Phase 1	16,880	33,600	33,600	33,600	33,600
Pure Water Phase 2			59,360	59,360	59,360
Local Surface Supply	22,015	22,015	22,015	22,015	22,015
City-Lake Cuyamaca Interagency Agreement	400	400	400	400	400
Groundwater	100	100	100	100	100
Sub-Total Local Supplies	**53,088**	**69,888**	**129,248**	**129,248**	**129,248**
Water Supply from Water Authority (purchased water)	149,778	140,660	87,907	94,350	98,816
Total City Water Supplies	**202,865**	**210,547**	**217,156**	**223,598**	**228,065**
Estimated Water Shortages	0	0	0	0	0

Source: City 2021

In addition to City conservation programs, as described in the 2018 LRDP EIR and Section 3.12.1 above, UC San Diego has an aggressive conservation policy to reduce potable water usage through LEED construction techniques, incorporation of the UC's Sustainable Practices Policy, campus outreach programs, and implementation of the Water Action Plan. The Water Action Plan outlines campus methods for reducing dependence on potable water and identifies broader opportunities for water conservation. UC San Diego's Water Action Plan was developed to fulfill the UC Sustainable Practices Policy's goal of reducing the University's per capita water consumption by 20 percent in 2020 and 36 percent by 2025. Based on the foregoing specific conclusions, it can be substantiated that there is sufficient planned water supply available to serve the proposed Update to the 2018 LRDP's future water demands in normal, single-dry year, and multiple-dry water year forecasts, in addition to other existing and planned future water demands of the PUD. Associated cumulative impacts to regional water supply would be less than significant and the implementation of the proposed Update to the 2018 LRDP would result in a less than cumulatively considerable impact.

Wastewater

The PLWTP currently treats approximately 155 MGD of wastewater generated within the region, which includes the UC San Diego campus. The PLWTP currently has the capacity to treat up to 240 MGD, and future sewage flows requiring treatment at PLWTP is anticipated to be reduced as Pure Water comes online. Therefore, it is anticipated that the plant would have the capacity to receive and treat wastewater from future development occurring in the City of San Diego, including an additional 0.25 MGD of sewage associated with the Update to the 2018 LRDP (see Section 3.12.3.3). Therefore, the cumulative impact caused by regional growth on wastewater treatment capacity would be less than significant. Since UC San Diego's future demands for wastewater treatment under the proposed Update to the 2018 LRDP would be adequately served by the existing capacity at the PLWTP, the project's impact on regional wastewater treatment capabilities would not be cumulatively considerable.

As described in Section 3.12.3.3, wastewater conveyance would potentially be impacted due to additional flows entering the City's 24-inch trunk main (UCSD Trunk Sewer) south of West Campus, as future flows would potentially exceed the capacity of this main. The Update to the 2018 LRDP would therefore potentially impact wastewater infrastructure downstream of campus, when considered in conjunction with existing and future projects that would place additional strain on the potentially undersized downstream sewer main. Mitigation measures Util-1 and Util-2 have been identified to reduce this impact to less than significant levels. This mitigation would involve potential upsizing of on-campus and off-campus City pipelines or the construction of a wastewater treatment plant to reduce sewage flows downstream. With mitigation, the Update's impact would not be cumulatively considerable.

Solid Waste

Implementation of the Update to the 2018 LRDP along with other regional off-campus development would increase the amount of solid waste produced in the region. As described in Section 3.12.1.3, landfills in the region are anticipated to reach capacity in the 2030s and 2040s. However, there are extensive regulations and waste management programs in place both at the state and local level focused on increasing waste diversion and conversion into the future, including the City's Zero Waste Plan for development within its jurisdiction. This plan targets 90 percent diversion of solid waste from landfills by 2035 and zero waste by 2040 (City 2015). As noted above under Section 3.12.3.4, the UC has also adopted and is implementing its own zero waste plan (similar to those imposed on local agencies) to do its part in sustainably managing and reducing waste. To make significant progress toward its zero waste goals, campus programs noted above would continue to expand as the UC San Diego campus population grows under the proposed Update to the 2018 LRDP. Similarly, in addition to the City's adopted zero waste plan, it is planning to develop facilities to accommodate and facilitate future diversion, including an organics processing facility and food processing and/or composting area that are being implemented to address the state's mandated waste diversion requirements. Therefore, both the City and UC San Diego would assist the state in achieving it solid waste management and diversion goals outlined in the applicable regulations by following aggressive goals set forth in their respective policies/plans and advancing methods for reducing solid waste disposal needs. Due to the aggressive waste reduction programs that have been adopted in the region and the campus' commitment to zero waste, the region would comply with state and local management and reduction statutes and regulations related to solid waste. No significant cumulative impact would occur and the Update to the 2018 LRDP would result in a less than cumulatively considerable impact.

Storm Water

Implementation of the Update to the 2018 LRDP along with other regional off-campus development would change flow rates in their localized area, and storm water basins. The campus is located within drainage basins that flow downstream outside of the campus boundaries. As described in Section 3.12.3.1, storm water would be managed on-campus through BMPs, low impact design features, and centralized storm water treatment basins, depending on the parameters of the future development sites on campus. Because stormwater flows from development under the Update to the 2018 LRDP are subject to regulations to address and reduce storm water flows, the project's cumulative impacts would be less than significant and would result in a less than cumulatively considerable impact to storm water infrastructure.

Electric Power

Implementation of the Update to the 2018 LRDP along with other regional off-campus development would increase the amount of development on campus and would require additional electric power infrastructure. This increase in energy infrastructure, such as an additional electrical substation, underground utilities, meters, and solar panels would be isolated to on-campus projects. The Update to the 2018 LRDP's cumulative impacts would therefore be less than significant and would result in a less than cumulatively considerable impact to electric power infrastructure. Refer to Section 3.5, Energy, for a discussion of cumulative energy use.

3.12.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under public services are evaluated above. There are no CEQA issues where there is no potential for a significant effect.

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3.13 WILDFIRE

This section evaluates the potential wildfire impacts associated with construction and/or operations related to the Update to the 2018 LRDP, including how project-related activities may influence wildfire risk, fire behavior, and emergency response. In December 2018, the CEQA Guidelines were updated to require lead agencies to specifically study a project's effects on wildfire, in addition to the wildfire discussion included in the hazards and hazardous materials impact analysis. While wildfire was previously covered under Section 3.7, Hazards and Hazardous Materials, in the 2018 LRDP EIR, it is now being analyzed separately to comply with the updated CEQA requirements. This section identifies the existing wildfire hazard conditions of the campus and surrounding areas and addresses impacts the Update to the 2018 LRDP may have in exacerbating wildfires as compared to impacts previously analyzed in the 2018 LRDP Information provided in this section is based on data from the City of San Diego, UC San Diego, and the CAL FIRE.

3.13.1 ENVIRONMENTAL SETTING

Wildfire Background

Wildfires burn in many types of vegetation, including forest, woodland, scrub, and grassland. Many species of native California plants are adapted to fire, and fire can play an important role in the health of these ecosystems. San Diego's Mediterranean-like climate, lack of summer rains, wind-conducive topography with steep canyons and swales, and fire-adapted vegetation predisposes the area to periodic burns. Wildfires have grown in frequency and intensity throughout the Western United States during the past several years, particularly in California, where prolonged drought and hot, dry temperatures have been common.

Wildfire Causes

Though wildfires can occur from natural origins (e.g., lightning) and can play an important role in certain ecosystems, the vast majority of wildfires in California are human-caused. Human-caused wildfires can be from debris burning, arson, equipment use, and power-line failures. As reported in the 2018 LRDP EIR, a 2017 study that evaluated 1.5 million wildfires in the United States between 1992 and 2012 found that humans were responsible for igniting 84 percent of wildfires and accounted for 44 percent of acreage burned (Balch et al. 2017). This research is consistent with wildfire activity statistics reported by CAL FIRE, which indicate that the percentage of wildfires that were human-caused ranged from 94 to 97 percent from 2018 through 2023 (CAL FIRE 2023). Land use and population changes affect ignition sources and fuel availability (California Office of Environmental Health Hazard Assessment [OEHHA] 2024). For example, new housing in or near wildland vegetation has led to increased fire losses at the wildland-urban interface. The expansion of the electrical distribution system, much of it vulnerable to strong winds, increases the risk of wildfires.

Recent data indicates a significant rise in the frequency and size of wildfires in California, attributed to climate change, prolonged droughts, and increased fuel accumulation (OEHHA 2024). The average number of large wildfires in California (i.e., greater than 10,000 acres) has increased from an average of approximately 6 to 16 per year since the 1960s, an increase of close to 170 percent. Since 1950, the total area burned each year ranged from a low in 1963 of 32,000 acres to a record high in 2020 of 4.2 million acres. In 2020, 4.2 million acres burned in California, more than double

the area burned in any previous year (OEHHA 2024). The average mean temperature and length of the fire season are increasing. The warmer temperatures, reduced snowpack, and earlier spring snowmelt result in longer and more intense dry seasons that make forests more susceptible to wildfires (CAL FIRE 2020). The encroachment of urban development into wildland areas has been another contributing factor that increases the risk of human-caused wildfires.

Wildfire History

Section 3.7.1.4, Wildland Fire Hazards, of the 2018 LRDP EIR describes the environmental setting and existing conditions on the UC San Diego campus. Although a large wildfire has not occurred on the UC San Diego campus in recorded history, portions of the campus would, under favorable fire weather conditions, facilitate wildfire spread, especially in the Open Space Preserve areas. While the campus is in a coastal location that generally has higher plant moisture levels, during extreme dry weather conditions, vegetation can become dry and facilitate ignition.

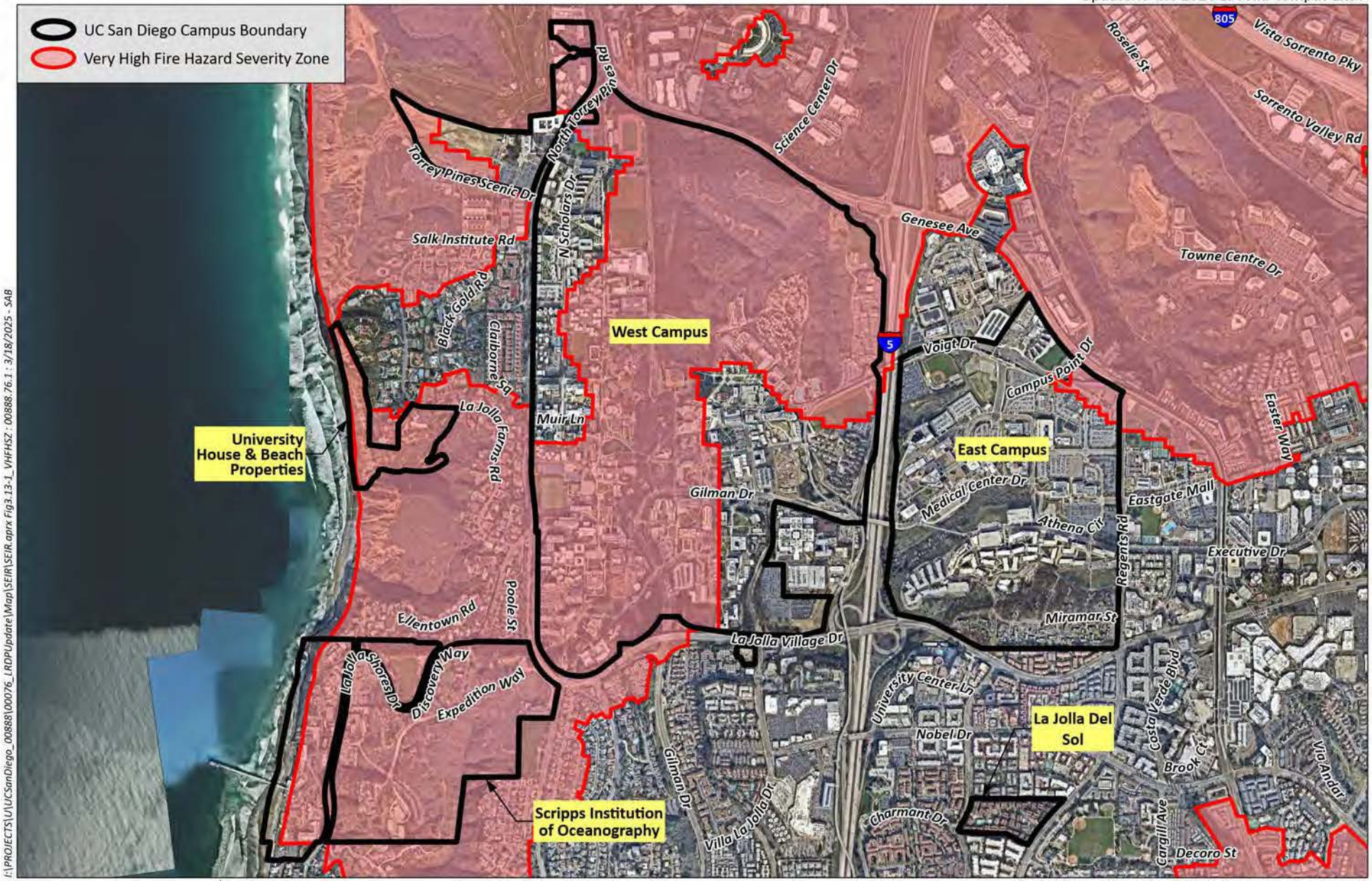
Wildfire Hazards

As described in Section 3.7.1.4 of the 2018 LRDP EIR, the most common type of fire anticipated in the vicinity of the campus is a wind-driven fire from the north/northeast during the fall that may ignite from a vehicle-related incident along I-5. Fire modeling of the typical vegetation within the La Jolla Campus indicates moderate to severe fire spread and intensity, with downwind ember deposition into receptive fuels up to 1.5 miles downwind, with 100 percent ignition rates (Weber 2024).

As shown in Figure 3.13-1, *Very High Fire Hazard Severity Zones*, large portions of the campus are mapped as within or adjacent to the Very High Fire Hazard Severity Zone (VHFHSZ) areas for the San Diego County Local Responsibility Area (LRA). Generally, the majority of SIO and a large portion of the West Campus are within a VHFHSZ with only a small portion of the East Campus east of Campus Point Drive mapped as within a VHFHSZ. Particularly, the Open Space Preserve in the northern and southwestern portions of West Campus and SIO in the southwest face the highest risk of fire based on the CAL FIRE mapping. The campus includes approximately 338 acres of Open Space Preserve areas designated as Ecological Reserve, Restoration Lands, Historic Grove, and Urban Forest, which consist of four types of open space that contain both natural and manmade landscapes (see Section 2.4.4.2 of this SEIR). These areas contain flammable vegetation that could encourage the spread of wildfire should an ignition occur.

Figure 3.13-2, *Wildland Urban Interface*, shows the CAL FIRE Wildland Urban Interface (WUI), which is defined as any area where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels. Small portions within the northern end of West Campus and along the southeastern corner of the East Campus are mapped as a WUI, as these areas are located near natural canyon areas or landscaped areas such as a golf course. UC San Diego defines UC San Diego defines WUIs as all lands within 0.25 mile of a VHFHSZ (UC San Diego 2024a). Fires in the WUI are more likely to cause heightened losses to the built environment, and the combination of natural and human-made fuels that are burned in WUI fires may lead to the formation or release of toxic emissions not found in purely wildland fires (California Governor's Office of Emergency Services 2023). As shown in Figure 3.13-2, the WUI is adjacent to UC San Diego to the north and northeast (U.S. Forest Service 2020).

The developed portions of campus have a relatively low fire risk; however, locations within 0.25 mile of a VHFHSZ area or WUI zone are considered to have a moderate to high risk of wildfire



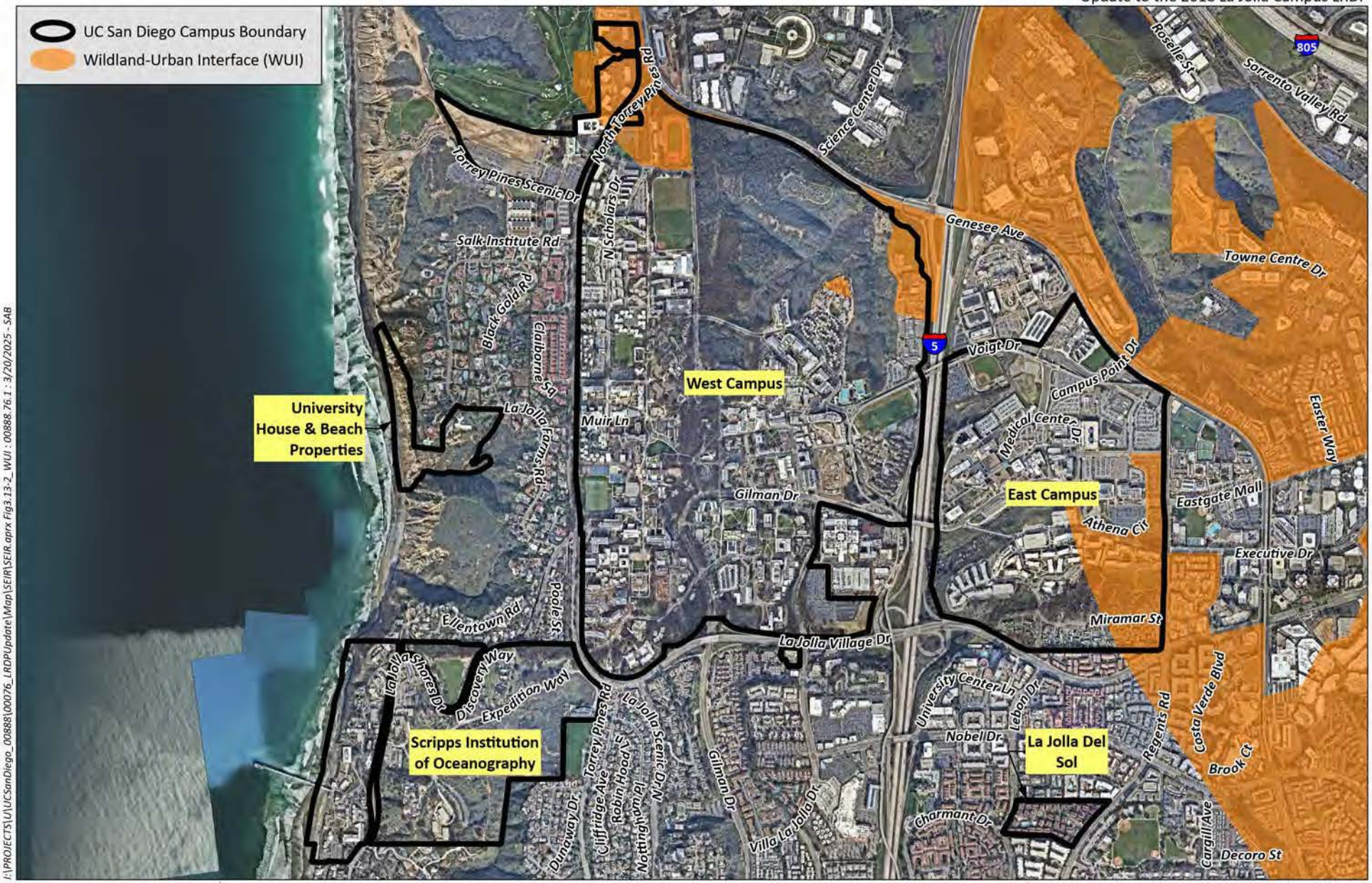
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Source: Aerial (SanGIS 2023), Fire Severity Zone (SanGIS)

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Very High Fire Hazard Severity Zone

Figure 3.13-1



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0 1,800 Feet

Source: Aerial (SanGIS 2023), WUI (U.S. Forest Service)

HELIX Environmental Planning

Wildland-Urban Interface

Figure 3.13-2

due to the proximity to flammable vegetation and natural terrain features, which can facilitate fire spread. In these areas, factors such as wind patterns, vegetation density, and topography may influence fire behavior, increasing the potential for fire impact on nearby structures and communities. Undeveloped and unmanaged open space lands present a moderate to severe exposure to developed areas due to rates of spread, fire intensity, convective and radiant heat release rates and downwind ember deposits in receptive fuels, which include non-fire-rated building components (Weber 2024).

To improve the survivability of structures in a wildland fire, fire professionals recommend using defensible space around all structures occupied by humans or domestic animals, and especially structures in the WUI. Defensible space creates a separation zone between wildlands and structures, meaning a space where fuel is managed or modified to minimize the spread of fire to the structure and providing space for defending structures from burning vegetation. This reduces fire speed, intensity, and flame lengths, and limits the spread of a wildfire. Defensible space involves clearing flammable manufactured materials, reducing flammable vegetation, spacing plants to reduce fire risks to the structure, and watering, pruning, and thinning the vegetation regularly. Defensible space creates a fuel modification zone (FMZ), which is not to be confused with the limited building zone (LBZ). An FMZ is a protective buffer that surrounds a structure, while an LBZ is a protective buffer that surrounds a biological open space area.

Secondary Effects

Secondary effects of wildfire include additional hazards such as poor air and water quality and landslides and slope instability. Following a wildfire, the aftermath typically leaves land scorched and exposed. Until the land rehabilitates, the exposed soils may contribute to adverse environmental impacts including air and water pollution and unstable soil conditions such as mudslides. The result of uncontrolled wildfire also includes debris from burned buildings, some of which can be highly toxic, and can adversely impact the environment by polluting local waterways such as streams and rivers.

Emergency Response

Please see Section 3.9.1.1 of this SEIR for a description of emergency facilities and response times related to fire. The City's emergency water supply and firefighting infrastructure are designed to support rapid response in WUI areas, including within the UC San Diego La Jolla campus area. In high-risk zones, hydrants and other water sources are strategically placed to provide sufficient water flow for wildfire suppression, particularly where flammable vegetation or steep terrain can intensify fire behavior. SDFR also has specialized wildfire resources, such as brush fire engines and dedicated water tenders. Additionally, partnerships with CAL FIRE and other regional agencies allow for resource sharing and coordinated response efforts, particularly for larger wildfires where mutual aid agreements come into effect.

3.13.2 REGULATORY FRAMEWORK

Similar to the 2018 LRDP EIR, there are no federal regulations that apply to the Update to the 2018 LRDP with regard to wildfire hazards. Applicable state and non-regulatory local regulations are discussed below.

3.13.2.1 STATE

California Building Code

The CBC, contained in Part 2 of Title 24 of the CCR, was last updated in 2022 and identifies building design standards, including updates to fire safety regulations and enhancements in fire protection systems and standards for building in WUI areas. Typical fire safety requirements of the CBC include the installation of fire sprinklers in all new high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas; and use of fire-resistant plants and drip irrigation in landscaping, particularly near buildings.

Chapter 7A of the CBC, Materials and Methods for Exterior Wildfire Exposure, prescribes building materials and construction methods for new buildings in a VHFHSZ that enhance fire resistance and mitigate fire spread from wildfires into developed areas. Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Updates in Chapter 10 enacted in 2022 refine egress requirements to ensure safe evacuation during fire events. The enhancements focus on clearer pathways and improved access points for emergency response personnel to minimize evacuation time and ensure access for firefighting teams during emergencies.

California Environmental Quality Act

In 2019, the CEQA Guidelines were updated to include a new Wildfire section in Appendix G. Previously, wildfire hazards were assessed under Hazards and Hazardous Materials section. The new Wildfire section specifically evaluates whether a project, located in or near a state responsibility area or very high fire hazard severity zone, would substantially impair an adopted emergency response or evacuation plan; exacerbate wildfire risks and expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope, prevailing winds or other factors; require the installation or maintenance of associated infrastructure that may exacerbate wildfire risk or result in temporary or ongoing impacts to the environment; or expose people and structures to significant fire-related hazards such as flooding, landslides, post-fire instability, or drainage changes.

California Fire Code

The CFC was last updated in 2022 and incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas to establish defensible space; and use of fire-resistant landscaping.

Chapter 49 of the CFC, Requirements for Wildland-Urban Interface Fire Areas, prescribes construction materials and methods in VHFHSZ areas. These requirements generally parallel CBC Chapter 7A.

3.13.2.2 REGIONAL

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The purpose of the County's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP; County of San Diego 2023) is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-made hazards. The plan was last revised in 2023 to reflect changes to both the hazards threatening San Diego County, as well as the programs in place to minimize or eliminate those hazards. An important component of the plan is the Community Emergency Response Team, which educates community members about disaster preparedness and trains them in basic response skills, such as fire safety, light search and rescue, and disaster medical operations. The MJHMP is a collaborative effort among various jurisdictions within the County, and it includes input and coordination with local entities, including UC San Diego.

County of San Diego Emergency Operations Plan

The County's Emergency Operations Plan was approved in August of 2022 and provides a framework for emergency response within the County. The Emergency Operations Plan outlines procedures for safe and effective evacuation during emergencies, including the importance of identifying evacuation routes and ensuring public awareness of these routes through communication systems. The Plan specifies the need for adequate access and egress points for residential developments, particularly in high-density areas prone to disasters like wildfires. This includes ensuring that roads are maintained and can accommodate emergency vehicles. The Plan outlines roles and responsibilities for law enforcement, fire services, and public health during emergencies to streamline evacuation and emergency response efforts. While relevant for the region, UC San Diego is not a signatory to this Plan.

The Emergency Operations Plan dictates who is responsible for a large-scale evacuation effort and how regional resources will be requested and coordinated (County of San Diego 2022). First responders are responsible for determining initial protective actions before the Emergency Operations Center and emergency management personnel have an opportunity to convene and gain situational awareness. Initial protective actions are shared and communicated to local Emergency Operations Centers and necessary support agencies as soon as possible to ensure an effective, coordinated evacuation. During an evacuation effort, the designated County Evacuation Coordinator is the County Sheriff, who is also the Law Enforcement Coordinator. The County Evacuation Coordinator is assisted by other law enforcement and support agencies.

3.13.2.3 LOCAL (NON-REGULATORY)

City of San Diego Municipal Code

Section 142.0412 of the City's Municipal Code sets forth brush management requirements to reduce the risk of fire hazards and has been amended multiple times since preparation of the 2018 LRDP

EIR. Brush management is required on publicly or privately owned land that is within 100 feet of a structure and contains native or naturalized vegetation. The Municipal Code establishes three defensible space zones. The Building Ignition Resistance Zone is a 5-foot-wide space extending out from the exterior building wall where no combustible materials are allowed. Brush Management Zone One extends from 5 to 35 feet from exterior walls. All native vegetation must be removed and replaced by approved and irrigated landscaping. Brush Management Zone Two extends 35 to 100 feet from exterior walls. Within Zone 2, 50 percent removal of native vegetation and 50 percent thinning of remaining vegetation is required; Zone Two is required to be maintained on a regular basis by pruning and thinning plants, removing invasive species, and controlling weeds. Although UC San Diego is not subject to the Municipal Code due to the Constitutional autonomy provided in Article IX, Section 9 to the UC, the City's brush management requirements are used as a guideline for fire mitigation efforts on campus to maintain design and operational consistency.

3.13.2.4 UNIVERSITY OF CALIFORNIA

Emergency Operations & Incident Management Plan

UC San Diego has an Emergency Operations & Incident Management Plan that provides planned responses, instructions, and procedures to various levels of human-made or natural emergency situations for all campus staff, students, and visitors (UC San Diego 2024b). The Plan addresses four phases of an emergency—mitigation, preparedness, response, and recovery. It provides building evacuation procedures, emergency supplies, and related emergency contacts and information sources. Multiple emergency response regions are provided throughout the campus equipped to provide necessary supplies and trained personnel in the event of an emergency. UC San Diego has a Campus Emergency Response Team that is responsible for providing training, exercises, and other emergency readiness initiatives and supporting implementation of the Emergency Operations & Incident Management Plan. Each campus department must have an Emergency Action Plan as individual components of the Emergency Operations & Incident Management Plan and campus-wide emergency preparedness. These plans identify response strategies and address the needs of faculty, staff, and students at their specific locations during emergency situations. Although unlikely given that the campus is not located in an area prone to large-scale wildfires that would affect the entire campus in a singular event, campus-wide emergencies that require full evacuation of the campus would defer to local emergency service authorities on evacuation routes and procedures. In the event of an emergency requiring campus closure or evacuation, the Emergency Operations & Incident Management Plan provides a traffic management plan that details how emergency staff would be deployed to major campus intersections to direct vehicles off campus in a safe and controlled manner. The Plan includes protocols for a "worst-case" scenario of immediate campus evacuation, but may be adapted based on the nature and timing of the emergency, anticipated immediate impact upon the campus, and availability of officers to implement the plan.

Wildland Fire and Fire Protection Project Design Guidelines

Guidance for evaluating effects related to wildland fires is provided within Technical Bulletin/Standard Operating Procedure 2024-007, Wildland Fire and Fire Protection Project Development Guidelines (CFMO Guidelines) (UC San Diego 2025). The CFMO Guidelines establish standards to ensure that development projects do not unnecessarily expose people or structures to a significant risks, including downslope or downstream flooding or landslides or, as a result of runoff, post-fire slope instability or drainage changes. The CFMO Guidelines detail general principles and existing conditions; existing laws, regulations, policies, and programs that have been

enacted to prevent, manage, or mitigate the threat of wildland fires to public health, safety, and the environment; typical adverse effects associated with wildland fires; and development project guidelines and project design considerations for use in the planning and land use approval process. To be in compliance with the CFMO Guidelines, a project must demonstrate compliance with applicable regulatory requirements. If a project is located within a High or VHFHSZ, a Fire Prevention Plan (FPP) must be prepared, reviewed, and accepted by the Fire Authority Having Jurisdiction (FAHJ) and CFMO prior to approval of the project. The purpose of the FPP is to assess project compliance with current regulatory codes, evaluate potential wildland fire behavior, and ensure that wildland fire hazards are adequately addressed and adequate fire services are available to provide sufficient emergency response. Collectively, the CFMO will work with off-campus fire agencies to prevent the loss of life in wildland fires; prevent the ignition of structures by wildland fires; prevent the encroachment of wildland fire upon communities; prevent a wildland-caused structural conflagration; prevent the spread of a structure fire to the wildland; and to limit the size of wildland fires.

Campus Fire Protection Landscaping Guidelines

On March 25, 2024, the CFMO issued Technical Bulletin/Standard Operating Procedure 2024-005 describing the minimum safeguards for protecting campus buildings and facilities exposed to the impacts of wildfires occurring in designated VHFSZA and WUI zones on or adjacent to established campus lands (UC San Diego 2024d). The CFMO, when possible, enforces the City of San Diego Fire Prevention Bureau policies and guidelines to provide a uniformly consistent regulatory process and a corresponding basis for establishing effective fire protection operations for SDFD personnel responding to the UC San Diego campus as first responders. The guidelines were issued to require management of defensible space to eliminate fire hazards and exposure of buildings and people from wildfire intrusion into and spread through the campus. Defensible space creates a separation zone between wildlands and structures, where fuel is managed or modified to minimize the spread of fire to structures and provide space for defending structures from burning vegetation. The guidelines include an approved list of acceptable plants that may be used to landscape defensible space/FMZs. It also provides a procedure for reviewing alternative plant species that are on the published list where flexibility may be needed.

Campus Fire Severity Hazard Area & Wildland Urban Interface Zone Building Requirements

On October 23, 2024, the CFMO issued Technical Bulletin/Standard Operating Procedure 2024-011 describing the minimum standards for the protection of life and property for campus buildings located in designated VHFHSZ area and WUI zones that are owned, operated, or occupied by UC San Diego (UC San Diego 2024a). The primary goal of the Technical Bulletin is to provide buildings in a VHFHSZ or WUI area the ability to survive a wildland fire without intervention of the SDFD. In the event of extreme fire behavior, ignition of any structure may occur, but if the prescribed measures are implemented and maintained, the damage can be limited or avoided. The standards and requirements to which new construction would be subject reference applicable National Fire Prevention Association, State Fire Marshal, American Society for Testing and Materials standards and state and local building code requirements. These include specific standards for reducing the ignition hazards of building materials including exterior walls, windows, and doors; horizonal projections; decking; roofing; vents; and exterior glazing.

Climate Action Plan

The campus is currently updating its CAP to meet new requirements of the UC Sustainable Practices Policy and develop and incorporate a Climate Change Adaptation and Resiliency Plan into the CAP. The plan addresses a climate vulnerability assessment that focuses on the effects of likely warming levels up to 2.0 degrees Celsius (considered likely to be reached at a median time of 2040). These include potential increased indirect effects that wildfires could have on the campus's critical infrastructure and services and sensitive populations, as the climate continues to warm. For example, when combined with strong winds, in future years the electrical grid may face increased vulnerability due to regional power line damage or preventative power safety shutoffs, as well as stress on the campus infrastructure and services systems. Additionally, indoor and outdoor air quality has health concerns for campus populations. The UC San Diego Climate Adaptation and Resiliency Plan would address these and other concerns through actionable recommendations to help the campus adapt and maintain resiliency in the changing climate.

3.13.3 PROJECT IMPACTS AND MITIGATION

3.13.3.1 ISSUE 1 — EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION

Wildfire Issue 1 Summary

Would implementation of the Update to the 2018 LRDP substantially impair an adopted emergency response plan or evacuation plan?

2018 LRDP EIR Significance Conclusion	Less than significant with mitigation.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant with mitigation.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	Roadway Closure Notification (Haz-6); Project Review and Design Requirements (WF-1).

Summary of Analysis in the 2018 LRDP EIR

Section 3.7.3.6 of the 2018 LRDP EIR concluded that implementation of the 2018 LRDP could interfere with emergency response and evacuation on the campus through construction-related road closures. Mitigation measure Haz-6A was identified in the 2018 LRDP EIR to address potential

impacts to emergency response and evacuation plans and reduce those impacts to less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP projects a higher campus population than the 2018 LRDP, which puts a higher population at risk of exposure to wildfires and requiring evacuation. The Update to the 2018 LRDP would consist of infill development and redevelopment of existing low-density sites and/or structures on campus to accommodate the proposed population growth and expanded program needs. The increased population and new development proposed under the Update would bring more people into areas mapped as VHFHZ (refer to Figure 3.13-1). Similar to the 2018 LRDP, the Update proposes to use existing surface parking lots for future development sites as well as the redevelopment of lower-density and/or aging facilities into higher-density developments. The Update also proposes slight modifications to areas designated in the 2018 LRDP Land Use Plan as Academic, Community-Oriented, General Services, Housing, and Sports and Recreation to support future development opportunities, provide more efficient development siting, and better reflect existing built conditions. Modifications to Open Space Preserve areas would occur through reduction of Urban Forest and Restoration Lands for the proposed development of new utility infrastructure in West Campus, while expanding areas of Open Space Preserve on the East Campus and at SIO. Based on the proposed modifications and increases in development and campus population, potential impacts related to implementation of the Emergency Operations & Incident Management Plan are reanalyzed for the Update to the 2018 LRDP.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to circumstances and no new information of substantial importance that require major revisions to the 2018 LRDP EIR.

Standards of Significance

The CEQA Guidelines were updated in December 2018 to require lead agencies to specifically study a project's effects on wildfire, in addition to the wildfire discussion traditionally required in the hazards and hazardous materials impact analysis. Appendix G of the CEQA Guidelines prefaces the wildfire-related sub questions with the initial question of whether the project is located in or near state responsibility areas or lands classified as VHFHSZ. As described in Section 3.13.1 under "Wildfire Hazards" and shown in Figure 3.13-1, portions of the campus are within or adjacent to VHFHSZ areas for the San Diego County LRA. Therefore, the sub questions apply and are evaluated in this SEIR.

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would substantially impair an adopted emergency response plan or emergency evacuation plan.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The following discussion evaluates compliance of the Update to the 2018 LRDP with the UC San Diego plans governing emergency response and evacuation, including the Emergency Operations & Incident Management Plan. The UC San Diego Technical Bulletin/Standard Operating Procedure 2024-007 presenting Wildland Fire and Fire Protection Project Development Guidelines explains that, generally, the following circumstances could result in increased fire risks related to people and structures:

- Projects and/or buildings located adjacent to and within the WUI and/or that incorporate or are surrounded by large open space preserves;
- High population and density in the WUI;
- Responses of people during a wildland fire (human behavior);
- Emergency response services (fire stations, equipment, and personnel) that are inadequate to serve the area;
- Development projects and buildings that are previously built without ignition-resistive construction, interior fire sprinklers, and/or sufficient water supply (volume) and pressure;
- Inadequate access and evacuation options;
- Roadside fuel management along roads;
- Insufficient maintenance of access roads, signage, gates; and
- Lack of appropriate landscaping restrictions, including monitoring and maintenance, FMZs, and periodic fuel management monitoring.

These circumstances are considered in the evaluation of the Update to the 2018 LRDP.

Impact Analysis

Like the 2018 LRDP, the Update to the 2018 LRDP presents a land use framework for future campus growth. Development under the plan would occur over time based on campus needs and funding availability and is not a mandate for growth. Implementation of the Update to the 2018 LRDP would result in a projected 8.3 million GSF of net new development on campus, including 12,780 net new resident housing beds, and serving a campus population of 96,300 (an increase of 30,700 persons compared to the total campus population of 65,600 evaluated for the 2018 LRDP) through horizon year 2040. The proposed densification of land uses located adjacent to open space has the potential to result in an increase in wildfire risk to people and structures compared to the development proposed under the 2018 LRDP. The Update to the 2018 LRDP would include additional redevelopment of existing urbanized areas on campus, including siting one new project (Warren College, C10 on Figure 2-5) within the WUI adjacent to an Ecological Reserve Open Space Preserve area within West Campus. The proposed infill development and increase in population density in any area of the campus could result in a greater demand for evacuation and emergency response resources.

The Update to the 2018 LRDP also includes potential development of an electrical substation within an undeveloped site designated as Urban Forest within Open Space Preserve (WC3 on Figure 2-5).

The electrical substation is proposed at the northeast corner of Genesee Avenue and Hopkins Drive in a location where the Urban Forest is bounded by development on two sides. Although the electrical substation would introduce a new use adjacent to a heavily vegetated area located within a VHFHSZ and adjacent to a WUI, the electrical substation would have low occupancy and would be located in an area that is not critical to evacuation or emergency assembly. To ensure that there is no net loss of overall Open Space Preserve resulting from the required utility infrastructure improvements, the Update proposes expansion of Open Space Preserve in areas previously designated as Academic and Housing within East Campus and areas designated as Academic within SIO. The areas proposed for redesignation currently contain undeveloped land and therefore, would not result in an increase in wildfire risk to other existing or future uses resulting from the proposed modifications because they would remain undeveloped and preserve the land from being developed in the future.

Development under the Update to the 2018 LRDP would continue to include fire access required by the California Fire Code, the standards cited in the CFMO Guidelines (Section 7.2; UC San Diego 2025), and as reflected in the campus emergency access planning detailed in the UC San Diego Emergency Operations & Incident Management Plan (UC San Diego 2024c). Since certification of the 2018 LRDP EIR, construction of a three-bay fire station (City of San Diego Fire Station 52/Torrey Pines Fire Station) was completed at the northwest corner of campus, which improves emergency response and evacuation preparedness due to closer proximity of fire services to the campus community (see Sections 3.9.1.1 and 3.9.3.1 of this SEIR). All projects are required to provide adequate emergency access by complying with the standard project design considerations detailed in Section 7.2, Fire Access Roads, of the CFMO Guidelines, including general standards for projects that utilize dead-end roads; and fire access road width, grade, and surface requirements (see also additional discussion in Section 3.1.3.3, below). The following general standards would apply to projects constructed under the Update relative to provision of new roadway infrastructure:

- Dead-end road length is measured from the beginning of the primary access road at a point where one can evacuate in two different directions (which may be off-site), measured to the end of the most remote cul-de-sac.
- Projects with an access road that exceeds the regulations for dead-end roads should first consider providing an alternate means of access and egress before resorting to other possible alternatives.
- An important factor in evaluating existing and proposed access roads is road connectivity. When feasible, projects should extend on-site roads to the edge of the property for possible future connectivity with other traffic infrastructure systems.
- To ensure necessary access to a project remains available in perpetuity, evidence must be provided that a permanent and reliable right of access has been obtained. These rights would be in the form of an easement that runs with the land.
- Security (privacy) gates or other types of barricades are discouraged. These measures can obstruct civilian egress and responder ingress during a fire emergency. However, in certain circumstances, gates can be allowed if they provide a rapid and reliable means of firefighter ingress and unobstructed egress for civilian evacuation, as determined by the FAHJ/CFMO.
- The minimum width identified in the California Fire Code should not be obstructed at any time. Parking should be outside the minimum required fire access road width.

- A Fire Code exception may be considered for width reductions over short sections of roadways where extreme topographic constraints make it impossible to obtain the minimum required width or where impacts to sensitive biological resources must be avoided. Any exception allowance must provide alternative measures that provide the same practical effect as the required element.

Compliance with these standards would ensure that emergency personnel have access flexibility to deal with changing dynamics in wildfires and other emergencies, and that the campus population has safe, reliable, and known evacuation alternatives during emergencies.

Additionally, the campus would continue to implement the Emergency Operations & Incident Management Plan, which is an adaptable document that is updated regularly (last updated October 2024) to address emergency access and emergency response procedures on the campus. Other programs to train campus emergency response personnel (e.g., disaster response training for staff of the Community Emergency Response Team [CERT], Emergency Operations Center, and Building Emergency Coordinator program) and as-needed coordination with the City Deputy Fire Marshal/FAHJ would continue under the Update to the 2018 LRDP. Although these measures would remain in place under the Update, impacts related to emergency response and evacuation would be potentially significant given the increased density and campus population compared to the 2018 LRDP. Impacts would remain unchanged from the 2018 LRDP EIR and would be potentially significant.

Implementation of the Update to the 2018 LRDP also could interfere with emergency response and evacuation on the campus through construction-related road closures, and while emergency response procedures would be put into place during construction, these procedures are not mandated by law. Additionally, on-campus evacuation planning largely relies on parking lots and other open space areas for evacuation sites (UC San Diego 2024b); the future infill of surface parking lots would require identification of alternative assembly locations to ensure adequate assembly is available for the increased campus population proposed under the Update. The Update would accommodate an increase in campus population compared to the 2018 LRDP and traffic congestion may increase over the life of the Update, which could adversely affect emergency response or evacuation routes in the event of an accident or natural disaster. However, based on the areas of campus available for new development and redevelopment, the buildout of the Update would not result in substantial changes to circulation patterns or emergency access routes and would not result in development that would block or otherwise interfere with use of evacuation routes. Based on current campus emergency evacuation mapping (UC San Diego 2024b), there are several potential sites that, if developed, would require relocation of areas currently designated as assembly locations. The campus employs shelter-in-place protocols during emergencies when it is safer to remain indoors than to evacuate and utilizes the "Triton Alert" mass notification system to identify and disseminate safe locations on campus (Abelman 2024). Evacuation of large populations of the campus would not be warranted, since wildfire-prone areas of the campus are fragmented and surrounded by developed areas such as buildings, parking lots, or maintained landscaped areas, reducing the likelihood of fire spreading across the entire campus. Such fragmentation means that only the immediate vicinity of the affected areas may require evacuation. However, in the event of a campus emergency, the UC San Diego Emergency Operations & Incident Management Plan would be implemented to safely evacuate and direct traffic off campus.

All new development proposed under the Update to the 2018 LRDP would be constructed to be fire-resistant, with designated shelter-in-place and emergency assembly areas to provide refuge for individuals not in immediate danger and minimize disruption to unaffected areas, per the

Emergency Operations & Incident Management Plan. As described above, development proposed under the Update would be subject to design review as described in the CFMO Guidelines. During project planning and design of future development projects, project design is reviewed by the Project Manager (CPM or FM offices), CFMO and UC San Diego EH&S - Emergency Management & Business Continuity Division to ensure that the project would not conflict with the Emergency Operations & Incident Management Plan or the relevant department's Emergency Action Plan. This would include updates to existing Emergency Action Plans that may already exists for the department or emergency response region within which the project would be located, or the preparation of a new Emergency Action Plan pursuant to the requirements and review of the CFMO and UC San Diego EH&S - Emergency Management & Business Continuity Division. These plans are required to include project-specific information such as building evacuation routes and procedures, emergency contact information for key personnel, floor plans, building refuge areas, emergency supply locations, locations of unique hazards or special features, and identification of designated assembly area(s). Large departments occupying different locations may produce individual plans for each facility they occupy. In the event that emergency access or evacuation space would be impacted by a future development project (e.g., displacement of a designated assembly area), alternate access and/or evacuation options would be identified.

Individual projects implemented under the Update to the 2018 LRDP would be subject to review related to building construction standards, access improvements, and other design measures to ensure adequate access for emergency services and evacuation of occupants (UC San Diego 2024c). The mitigation framework identified below has been developed to address potentially significant impacts related to emergency response and evacuation and would be applied to all projects implemented as part of the Update to the 2018 LRDP.

Level of Significance Before Mitigation

As described above, impacts would be potentially significant, consistent with the conclusion in the 2018 LRDP EIR. Therefore, the following mitigation measures would be implemented.

Mitigation Measures

Applicable measure from the 2018 LRDP EIR:

See below for edits to Haz-6.

New and/or revised mitigation measures for the Update to the 2018 LRDP:

Measure Haz-6 has been revised as indicated in underlined text to provide additional guidance for alternative emergency routes and include all campus departments that must be notified of roadway closures.

Haz-6 **Roadway Closure Notification.** In the event that the construction of a project requires a lane or roadway closure on campus, prior to construction the contractor and/or Project Manager shall ensure that the UC San Diego Campus Fire Marshal; UC San Diego EH&S - Emergency Management & Business Continuity Division; representatives from the campus CERT, Emergency Operations Center, and Building Emergency Coordinator programs; and campus community at large are notified. If determined necessary by the UC San Diego Fire Marshal, local emergency services will be notified by the Fire Marshal of the closure. <u>If road closures would affect</u>

emergency routes, alternative routes shall be identified and directional signage provided.

New mitigation measure WF-1 would be implemented to address potential impacts to emergency evacuation and response planning from implementation of future infill development. Projects proposed under the Update to the 2018 LRDP would undergo review to ensure consistency with campus design requirements addressing emergency access, operations, and evacuation.

WF-1 **Project Review and Design Requirements**. During the planning and design phase of a future development project, the Project Manager (CPM or FM offices) shall ensure that the project design has been reviewed by the CFMO and UC San Diego EH&S - Emergency Management & Business Continuity Division for compliance with applicable campus plans, policies, and guidelines related to emergency access, operations, and evacuation, including, but not limited to, the CFMO Guidelines, Campus Fire Protection Landscape Guidelines, and Campus Fire Severity Hazard Area & Wildland Urban Interface Zone Building Requirements. For projects located within a High or VHFHSZ, as identified in the map adopted by the State Fire Marshal, an FPP shall be prepared, reviewed, and accepted by the FAHJ and CFMO pursuant to the requirements of the CFMO Guidelines prior to approval of the project. The FPP shall include, but not be limited to, review of emergency services availability and travel time, access for emergency services and evacuation of occupants, firefighting water supply, fire sprinkler system, ignition resistant construction, and defensible space and landscaping/vegetation management, The Project Manager must obtain written verification of compliance prior to finalizing design plans. The approved plans shall be incorporated into the project's construction documents to ensure implementation.

Level of Significance After Mitigation

Implementation of mitigation measures Haz-6 and WF-1 would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

3.13.3.2 ISSUE 2 — WILDFIRE POLLUTANT CONCENTRATIONS

Wildfire Issue 2 Summary

Would implementation of the Update to the 2018 LRDP, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation required.

Summary of Analysis in the 2018 LRDP EIR

As stated at the beginning of this section, the 2018 LRDP EIR was not required to include a separate analysis of indirect wildfire impacts, and therefore did not discuss exposure to pollutant concentrations from wildfire. However, more general wildfire impacts were previously discussed in Section 3.7.3.7 of the 2018 LRDP EIR. Portions of the UC San Diego campus were identified as being located in a VHFHSZ and additional development under the 2018 LRDP was anticipated to directly or indirectly expose people or structures to increased risks associated with wildland fires. A campus-specific fire hazard assessment was conducted and identified the majority of the campus within low to moderate fire hazard priority rankings; however, the North Canyon on the West Campus, the Birch Aquarium and surrounding canyon areas at SIO, and Audrey Geisel University House and beach properties were identified as high fire hazard priority ranking (Dudek 2017). As a result of hazard reduction recommendations in that assessment, UC San Diego began (and would continue with the Update to the 2018 LRDP) implementation of construction-related, building-design-related, and other operational recommendations for fire hazard areas to reduce wildland fire risks as referenced in the Technical Bulletins/Standard Operating Procedures described in detail in Section 3.13.2.4.

In addition, the 2018 LRDP included conversion of ignitable fuels to lower flammability landscape and brush management around buildings adjacent to undeveloped land. Given the fire protection measures undertaken by UC San Diego, wildland fire risk was anticipated to be minimized throughout implementation of the 2018 LRDP. The UC San Diego Fire Marshal and staff would continue to be responsible for campus-wide fire prevention and provide services such as plan review and construction inspections in accordance with current California building and fire codes.

Therefore, the 2018 LRDP EIR concluded impacts related to wildland fires would be less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP projects a higher campus population than the 2018 LRDP, which puts a higher population at risk of exposure to wildfires. The Update to the 2018 LRDP would consist of infill development and redevelopment of existing low-density sites and/or structures on campus to accommodate the proposed population growth and expanded program needs. Based on the proposed land use modifications and increases in development density and campus population, potential impacts from exposure to wildfire-related pollutants should be analyzed, and risks related to exposure of the campus population to uncontrolled spread of a wildfire should be reanalyzed for the Update to the 2018 LRDP.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to circumstances and no new information of substantial importance that requires major revisions to the 2018 LRDP EIR.

Standards of Significance

The CEQA Guidelines were updated in December 2018 to require lead agencies to specifically study a project's effects on wildfire, in addition to the wildfire discussion traditionally required in the hazards and hazardous materials impact analysis.

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if, due to slope, prevailing winds, and other factors, it would exacerbate wildfire risks and, thereby, expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The following discussion analyzes the wildfire risks associated with development of the Update to the 2018 LRDP and the fire prevention systems that would be implemented to reduce the risks.

Impact Analysis

As discussed in Section 3.13.1, developed portions of campus have a relatively low fire risk; however, locations within 0.25 mile of a VHFHSZ area or WUI zone are considered to have a moderate to high risk of wildfire due to the proximity to flammable vegetation and natural terrain features, which can facilitate fire spread. Factors such as wind patterns, vegetation density, and topography can influence fire behavior and increase the potential for fire impact on nearby structures and communities. Specifically, vegetation such as eucalyptus trees that are located throughout the campus can impose a threat due to their inherent flammability and tendency for long range (1.5+ mile) deposits of burning materials downwind. Most campus buildings were not

built to the "structural hardening" standards imposed by CBC Chapter 7A prescriptive requirements for buildings located in VHFHSZ and WUI areas and remain susceptible to fire ignition originating a considerable distance away/off-site. Despite increased wildfire risk due to these conditions, the proposed Update would not increase the risk of exposure to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire on campus, compared to the 2018 LRDP.

In general, construction of projects under the Update to the 2018 LRDP would not expose people to increased pollutant concentrations or uncontrolled spread of wildfire or exacerbate wildfire risk related to topographical or wind conditions or other factors such as flammability of vegetation or drought conditions. With the exception of the electrical substation project described in more detail below, the Update to the 2018 LRDP would include new development and redevelopment of existing urbanized areas on campus that have been previously disturbed and are on relatively flat or slightly hilly topography, not in steep, vegetated slopes, and hillsides where fire risk is greatest. The Update to the 2018 LRDP anticipates implementation of one new project that could be constructed within a WUI area, Warren College (WC10) that would redevelop an existing lower-density housing site that is adjacent to an Ecological Reserve Open Space Preserve area within West Campus (see Figures 2-5 and 3.13-2). The Update to the 2018 LRDP also includes potential development of an electrical substation (WC3) within an undeveloped site designated as Urban Forest that is located adjacent to a WUI areas within Open Space Preserve and associated expansion of Open Space Preserve in areas previously designated as Academic and Housing within East Campus and areas designated as Academic within SIO (see Figures 2-3 through 2-5 and 3.13-2). None of these changes would result in changes in slopes or other factors that would exacerbate wildfire risk, since they would primarily redevelop existing developed areas or retain existing undeveloped open space. The Warren College and electrical substation sites are located upslope from the adjacent open space canyons, which, if burned during a wildfire, could expose occupants to increased pollutant concentrations or increased wildfire risk.

Although the electrical substation would introduce a new use adjacent to a heavily vegetated area with varied topography, upslope of a vegetated canyon, the electrical substation would have low occupancy and would not expose occupants within the site or adjacent areas to increased wildfire risks. No habitable construction is proposed within steeply sloped areas that could exacerbate risks related to the spread of wildfire compared to the development anticipated under the 2018 LRDP. Future projects that may be proposed for development adjacent to open space areas would be subject to the Campus Fire Protection Landscaping Guidelines related to management of defensible space through fuel management/modification, similar to existing facilities that conduct fuel clearance to reduce wildfire risk per campus requirements.

Development under the Update to the 2018 LRDP would also include demolition and replacement of some existing structures with newer development that meets modern Fire Codes, thereby providing an increase in fire safety in comparison to existing conditions. Implementation of fire protection features as outlined under Wildland Fire and Fire Protection Project Design Guidelines, Campus Fire Protection Landscaping Guidelines, and Campus Fire Severity Hazard Area & Wildland Urban Interface Zone Building Requirements in the Regulatory Framework would further ensure that the projects implemented under the Update would incorporate fire safety measures. The CFMO would review plans during the plan review process pursuant to the campus' mitigation framework and mitigation measure WF-1, above, and would inspect the project facility prior to occupancy of buildings to ensure all applicable CBC, CFC, and other related code requirements governing fire safety are met.

Implementation of fire hazard reduction measures, campus-wide fire prevention review, and compliance with appropriate fire safety regulations would continue to minimize the risk of wildland fires, as described under Issue 1. Finalization of Station 52, described in Section 3.13.1 above, would further minimize risks identified in the 2018 LRDP EIR. Further, the campus CAP, currently under preparation, will include a resiliency plan that will address the increased risk of wildfire due to climate change.

Level of Significance Before Mitigation

Impacts would be less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the LRDP EIR.

3.13.3.3 ISSUE 3 —INSTALLATION OR MAINTENANCE OF ASSOCIATED INFRASTRUCTURE

Wildfire Issue 3 Summary

Would implementation of the Update to the 2018 LRDP require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

2018 LRDP EIR Significance Conclusion	Not required to be analyzed in 2018 LRDP EIR.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	N/A
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	N/A
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation required.

Summary of Analysis in the 2018 LRDP EIR

While the prior EIR was not required to discuss the relationship between infrastructure and fire risk, a general discussion of utilities, service systems, and energy is provided in Section 3.15 of the 2018 LRDP EIR. Impacts were determined to be less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

As described in Section 2.4.4.4 of this SEIR, the Update to the 2018 LRDP would build on UC San Diego's existing utility systems, which would need to be expanded to meet the expanded program needs and additional population growth anticipated with the Update. New utility and critical infrastructure improvements that were not previously identified in the 2018 LRDP warrant evaluation of potential impacts related to wildfire risk from implementation of campus infrastructure.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

There are no substantial changes with respect to circumstances and no new information of substantial importance that requires major revisions to the 2018 LRDP EIR.

Standards of Significance

The CEQA Guidelines were updated in December 2018 to require lead agencies to specifically study a project's effects on wildfire, in addition to the wildfire discussion traditionally required in the hazards and hazardous materials impact analysis.

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if it would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risks or result in temporary or ongoing impacts to the environment.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The discussion below considers infrastructure improvements included in the Update to the 2018 LRDP and references Section 3.12, Utilities and Services Systems, of this SEIR for a more detailed discussion of utility and service system improvements.

Impact Analysis

Development under the proposed Update to the 2018 LRDP would consist of infill development and redevelopment on campus. Development with inadequate access (e.g., long roads with a single access point, roads over steep grades, improper road surfaces, and/or narrow roads) can significantly contribute to the inability to effectively evacuate areas during a wildfire, create unnecessary response delays, and potentially obstruct the emergency access necessary for fire, ambulance, or law enforcement personnel. No new roads would be constructed with inadequate

access or through vegetated, undeveloped areas that would exacerbate fire risk, as new internal campus roadways would be constructed to serve immediately adjacent development. All new roadways would be required to be constructed in full compliance with California Fire Code Standards and pursuant to UC San Diego standards for fire access, as cited in the CFMO Guidelines, Section 7.0, Standard Mitigation and Project Design Considerations, including limiting the allowable length of dead-end roads and constructing roads to accommodate safety access (see Section 3.13.3.1, above for additional discussion of roadway standards).

Sections 2.4.4.4 and 3.12 of this SEIR describe the required infrastructure necessary to support the Update to the 2018 LRDP. These infrastructure upgrades would involve repair and/or replacement of portions of the campus water service systems, provision of new energy infrastructure, replacement of gas-fired heating systems with electric air and water source heat pumps at the Central Utilities Plant to meet decarbonization goals, provision of an additional electrical substation and connections to nearby existing infrastructure, potential development of a wastewater treatment, and upsizing or replacement of sewer lines and storm drains. Several portions of the existing water system require upgrades to comply with fire flow redundancy requirements in the existing condition and/or would not be able to handle fire flows after implementation of new development associated with future development associated with the proposed Update to the 2018 LRDP. The study further indicated that, to accommodate the planned expansion over the planning horizon of the proposed Update to the 2018 LRDP, some internal water mains would be realigned, extended, or upsized. These types of improvements would result in minor changes to the existing built environment and would involve temporary construction throughout the campus. Electricity is currently supplied throughout campus via a network of underground cables and connections, and future electrical distribution infrastructure would also be constructed underground pursuant to the Campus Building Design Standards.

Utility improvements would be sized to accommodate projected campus growth and would not be constructed in such a way as they would increase risks related to wildfire in part because they would be constructed underground. Overall, development under the Update to the 2018 LRDP would be required to comply with all applicable regulations to mitigate fire risk, including the CBC and CFC and campus specific standards related to road access, defensible space, and utility infrastructure, as described above in Section 3.13.2.1. Impacts would be less than significant.

Level of Significance Before Mitigation

Impacts would be less than significant before mitigation, consistent with the 2018 LRDP EIR conclusions regarding infrastructure improvements.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

3.13.3.4 ISSUE 4 — FLOODING OR LANDSLIDES

Wildfire Issue 4 Summary

Would implementation of the Update to the 2018 LRDP expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of run-off, post-fire slope instability, or drainage changes?

2018 LRDP EIR Significance Conclusion	Less than significant.
Would Proposed Changes in Update Result in New Significant Impacts or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Would New Information or New Circumstances Result in New or Substantially More Severe Significant Impacts than 2018 LRDP EIR?	No.
Update to the 2018 LRDP SEIR Significance Conclusion	Less than significant.
Applicable 2018 LRDP EIR Mitigation Measures or New Mitigation Measures to Address Impacts for Update	No mitigation required.

Summary of Analysis in the 2018 LRDP EIR

The 2018 LRDP EIR did not specifically analyze the effects of wildfire on geologic instability and hazards. However, general discussion of issues related to exposure of people or structures to risks related to flooding and landslides, as well as potential impacts related to run-off, slope instability, and drainage changes, are addressed in Section 3.5, Geology and Soils, and Section 3.8, Hydrology and Water Quality. Section 3.8.5 of the 2018 LRDP EIR describes there is no potential for the 2018 LRDP to result in impacts related to the placement of structures, including residences, in flood hazard areas specifically related to flood zones, seiches, tsunamis, or mudflows. Regarding landslides, Section 3.5.3.1 of the 2018 LRDP EIR noted that areas with potential for landslides occur throughout the La Jolla Campus, but are mainly restricted to steep slopes and hillsides in the northern (West Campus) and western (SIO) portions of the campus (see Figure 3.5-1, which includes the limits of known and suspected landslide areas known at UC San Diego). Landslide risk can be minimized through slope stabilization, geotechnical investigations, and CBC compliance. Section 3.5.3.3 of the 2018 LRDP EIR discussed potential hazards associated with slope instability, including surficial failures, earthflows, debris flows, mudslides, rockfalls, soil creep, or erosion, and concluded that steep slopes can typically be stabilized, and all conditions present at UC San Diego were anticipated to be controlled with standard planning and design techniques. Similarly, risks from coastal bluff instability can be reduced through stabilization and setbacks from the bluffs. The potential impacts of the 2018 LRDP to drainage patterns are described in Sections 3.8.3.1 and 3.8.5 of the 2018 LRDP EIR; potential impacts related to drainage alternations from implementation of the 2018 LRDP would not impede or redirect flood flows as a result of changes in drainage patterns. Impacts were determined to be less than significant.

Proposed Changes That Require Major Revisions to the 2018 LRDP EIR

The Update to the 2018 LRDP would consist of infill development and redevelopment of existing low-density sites and/or structures on campus to accommodate the proposed population growth and expanded program needs. Development of an electrical substation is proposed within an undeveloped canyon area currently designated as Open Space Preserve at the northeast corner of Genesee Avenue and Hopkins Drive in a location where the Urban Forest is bounded by development on two sides, putting new development not previously considered in the 2018 LRDP at potential risk of flooding or landslides resulting from run-off, post-fire slope instability, or drainage changes. Based on the proposed land use modifications, associated impacts are analyzed for the Update to the 2018 LRDP.

Substantial Changes with Respect to the Circumstances under which the Update to the 2018 LRDP is Undertaken or New Information of Substantial Importance

Standards of Significance

In December 2018, the CEQA Guidelines were updated to require that lead agencies specifically study a project's effects on wildfire, in addition to the wildfire discussion traditionally required in the hazards and hazardous materials impact analysis.

Based on Appendix G of the CEQA Guidelines, implementation of the Update to the 2018 LRDP may have a significant impact if, due to increased run-off, changes in drainage patterns, or post-fire slope instability, it would expose people or structures to significant risks, including downslope or downstream flooding or landslides.

Analysis of the Update to the 2018 LRDP

Assumptions and Methodology

The discussion below references information presented in Section 3.5.3.3, Geologic Stability, of the 2018 LRDP EIR, with additional discussion provided in the event that steep-sloped canyon areas of the campus are burned.

Impact Analysis

The Update to the 2018 LRDP does not propose specific development projects that would exacerbate flooding or landslide risk compared to what was evaluated in the 2018 LRDP EIR. With respect to flooding, as described in Section 3.8 of the 2018 LRDP EIR, topography within the UC San Diego campus consists of relatively flat to gently sloping marine terraces interspersed with steep canyons and valleys. The La Jolla Campus (including SIO) is in Flood Zone X, which is outside of the 100-year and 500-year flood hazard areas or any County-identified flood hazard areas (San GIS 2017). Development proposed under the Update is located on the Torrey Pines Mesa within West and East Campuses, at average elevations ranging between 300 to 400 feet AMS. The Update to the 2018 LRDP would include additional redevelopment of existing urbanized areas on campus, including citing one new redevelopment project (Warren College, WC10 on Figure 2-5) adjacent to an Ecological Reserve Open Space Preserve area within West Campus. The Update to the 2018 LRDP also includes potential development of an electrical substation within an undeveloped site

that would be bounded by undeveloped areas on two sides (WC3 on Figure 2-5). These areas are located upslope from the adjacent open space canyons, which, if burned during a wildfire, would not contribute to risks related to flooding of new buildings or structures as runoff would flow downstream and not into the development areas. Therefore, implementation of the Update would not expose people or structures to significant risks related to downslope or downstream flooding as a result of run-off, post-fire slope instability, or drainage changes.

Similar to the 2018 LRDP, the Update proposes to use existing surface parking lots for future development sites as well as the redevelopment of lower-density and/or aging facilities into higher-density developments. Development is proposed outside of, but in proximity to, areas of known landslides in the northern portion of West Campus within Open Space Preserve areas, including the proposed redevelopment within Warren College and the electrical substation at the northeast corner of Genesee Avenue and Hopkins Drive (see Figure 3.5-1 of the 2018 LRDP EIR). Construction of these projects would not expose people or structures to landslide risks resulting from run-off, post-fire slope instability, or drainage changes, as they are located outside of known landslide areas. In general, the same methods of reducing risks identified in the 2018 LRDP EIR would be utilized for the Update to the 2018 LRDP, including compliance with the UC Seismic Safety Policy requirements for preparation of geotechnical investigations to inform design of appropriate design features to incorporate, slope stabilization, drainage/stormwater management, and CBC compliance.

Level of Significance Before Mitigation

Impacts would be less than significant before mitigation, consistent with the conclusion in Section 3.5.3.3 of the 2018 LRDP EIR.

Mitigation Measures

No mitigation was required in the 2018 LRDP EIR and none are assumed for implementation of the Update to the 2018 LRDP.

Level of Significance After Mitigation

Impacts would remain less than significant without mitigation, consistent with the conclusion in the 2018 LRDP EIR.

3.13.4 CUMULATIVE IMPACTS AND MITIGATION

Wildfire Cumulative Issue Summary

Would implementation of the Update to the 2018 LRDP have a cumulatively considerable contribution to a cumulative wildlife impact considering past, present, and probable future projects?

Cumulative Impact	2018 Significance Determination	2018 LRDP Contribution	Updated Significance Determination	Update to the LRDP Contribution
Emergency response plans or emergency evacuation plans.	Potentially significant.	Not cumulatively considerable with implementation of Haz-6.	Potentially significant.	Not cumulatively considerable with implementation of Haz-6 and WF-1.
Pollutant concentrations.	Not analyzed.	Not analyzed.	Less than significant.	Not cumulatively considerable.
Installation or maintenance of associated infrastructure.	Less than significant.	Not cumulatively considerable.	Less than significant.	Not cumulatively considerable.
Flooding or landslides.	Not analyzed.	Not analyzed.	Less than significant.	Not cumulatively considerable.

The study area for cumulative wildfire impacts is the UC San Diego campus and nearby City areas within the University City and La Jolla communities. Cumulative impacts related to wildfire risk are examined relative to how wildfire-induced conditions may exacerbate risks across a wider geographic area when combined with other local or regional development. The analysis below references the Blueprint SD PEIR relative to cumulative impacts (City 2024).

Emergency Response Plans or Emergency Evacuation Plans

Section 3.7.4 of the 2018 LRDP EIR concluded that impacts to emergency response plans or emergency evacuation plans would be potentially significant but not cumulatively considerable with implementation of mitigation measure Haz-6. Construction and operation associated with future development in the City of San Diego could result in activities that could interfere with adopted emergency response or evacuation plans, such as temporary construction barricades or other obstructions that could impede emergency access. Since the area surrounding the campus is largely built out, new development anticipated to occur within the cumulative study area would result in higher intensity infill development, particularly within urban areas with established transportation networks. Throughout the City, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials. The City would continue to implement its Emergency Operations & Incident Management Plan, Operational Area

Emergency Plan, California Master Mutual Aid Agreement, and other applicable policies and procedures related to emergency response and evacuation (City 2024). Application of the City's existing fire code would prohibit future development from exacerbating existing constraints related to development on dead-end roads.

As described in Section 3.13.3.1, UC San Diego has an adopted Emergency Operations & Incident Management Plan, which addresses planned responses, instructions, and procedures to various levels of human-made or natural emergency situations for all campus staff, students, and visitors. In addition, under current campus procedures described in Section 3.13.2.4, the UC San Diego Emergency Operations & Incident Management Plan would continue to be implemented to ensure emergency response services are not impaired or interfered with in the event of a temporary roadway closure and/or changes in campus traffic patterns. Although the Update would result in an increase in campus population compared to the 2018 LRDP, due to the dispersed nature of wildfire-prone areas on campus and established emergency response protocols that minimize the need for mass evacuation, evacuation during a wildfire would likely be limited to affected zones, reducing the potential for the Update to contribute to cumulatively considerable impacts related to impairment of evacuation routes from congestion. Furthermore, the recent completion of Fire Station 52 located near the intersection of Genesee Avenue and North Torrey Pines Road would improve fire protection and emergency response services to the UC San Diego campus, increasing resources to support faster containment of fires. The addition of mitigation measure WF-1 would ensure that adequate emergency response planning is incorporated into the design of future campus development projects, and that emergency response plans are updated as needed to incorporate new development. Therefore, the proposed Update to the 2018 LRDP's contribution to cumulative impacts associated with interference with adopted emergency response or evacuation plans would not be cumulatively considerable with the inclusion of measures Haz-6, WF-1, and WF-2, consistent with the conclusion in the 2018 LRDP EIR.

Pollutant Concentrations

Section 3.7.4 of the 2018 LRDP EIR concluded that impacts regarding wildfire exposure would be less than significant and not cumulatively considerable. An adverse risk of wildland fires currently exists on the UC San Diego campus and in the City of San Diego due to the topography and weather patterns, particularly during drier weather conditions. Although existing and future residents and structures would continue to be at risk, the City has developed policies to manage and reduce the fire risk. Future development within the cumulative study area would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations. As described in Section 4.18.4 of the Blueprint SD PEIR, while it is not anticipated that future development within the University CPU would exacerbate wildfire risk, residents may be exposed to pollutant concentrations associated with wildfire and/or the uncontrolled spread of a wildfire. In the absence of project-specific information to evaluate site conditions such as slope and prevailing winds, the PEIR concluded that impacts related to exacerbation of wildfire risks resulting in exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire significant and unmitigable, in the absence of project-specific information to evaluate site conditions such as slope and prevailing winds.

Similarly, UC San Diego implements hazard reduction measures for fire hazard areas such as establishing defensible space, using fire-resistant landscaping, and constructing buildings in compliance with CFC and CBC requirements (see Section 3.13.2), reducing wildland fire risks. Also, UC San Diego would continue to implement the required brush management around buildings that are adjacent to undeveloped areas under the proposed Update to the 2018 LRDP. Furthermore, UC

San Diego and the City would continue to comply with applicable fire prevention systems prescribed in the CBC, which would reduce and prevent risks associated with wildland fires and the release of pollutant concentrations. While it is not anticipated that future development would exacerbate wildfire risks, there is potential for increased exposure to pollutant concentrations associated with increased wildfires. Because the Update to the 2018 LRDP would not contribute to the risk of wildland fire, the contribution to the regional cumulative impact is not cumulatively considerable, consistent with the conclusion in the 2018 LRDP EIR.

Installation or Maintenance of Associated Infrastructure

While the 2018 LRDP EIR did not specifically address infrastructure in relation to wildfire, Section 3.15.4 of the 2018 LRDP EIR concluded that all impacts related to utilities and infrastructure would be less than significant and not cumulatively considerable. Compliance with the applicable development and design standards and requirements described in Section 3.13.3.3 would ensure that installation and maintenance of new infrastructure under the Update to the 2018 LRDP would not exacerbate wildfire risk. Similarly, future utility and infrastructure improvements within the cumulative study area would be required to comply with all applicable regulatory standards for the reduction of fire risk; thus, these improvements are not likely to exacerbate fire risk. However, given that future specific development projects within the communities surrounding the campus are unknown at this time, it cannot be determined whether the installation of such infrastructure would have the potential to exacerbate fire risk or result in adverse impacts on the environment. Therefore, the proposed Update to the 2018 LRDP's contribution to the regional cumulative impact is not cumulatively considerable.

Flooding or Landslides

While the 2018 LRDP EIR did not specifically address geologic instability related to wildfire, Section 3.5.4 of the 2018 LRDP EIR concluded that impacts related to soil erosion and unstable soil would be less than significant and not cumulatively considerable. Development under the Update to the 2018 LRDP SEIR would be required to comply with applicable regulations and policies related to flooding, drainage patterns, and landslides, and thereby avoid significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. For future development within the communities surrounding the campus that is proposed in areas with wildfire risk, landslide and/or flooding issues, the potential for such projects to exacerbate wildfire risk, resulting downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes could be significant. Potential cumulative impacts associated could occur if multiple development projects were to increase wildfire risk and exposure of people or structures to significant risk within proximity to the campus, resulting in greater combined impacts than would be anticipated by just the Update alone. While future development within the cumulative study area could result in increased exposure to flooding or landslide related risks, individual development projects would typically avoid impacts through compliance with wildfire related regulations and site-specific geotechnical investigations and recommendations. All future development under the Update to the 2018 LRDP would be required to comply with applicable Design Guidelines and building and fire code regulations that would reduce the potential for cumulative impacts to a less than significant level, similar to the 2018 LRDP.

3.13.5 CEQA ISSUES WHERE THERE IS NO POTENTIAL FOR A SIGNIFICANT EFFECT

All checklist items in Appendix G of the CEQA Guidelines under wildfire are evaluated above. There are no CEQA issues where there is no potential for a significant effect related to wildfire.

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4.0 Other CEQA Considerations

4.1 Effects Adequately Analyzed in the 2018 LRDP EIR

This section discusses the environmental effects of the UC San Diego 2018 LRDP for which the proposed Update to the 2018 LRDP would not result in changes to the analysis provided in the 2018 LRDP EIR. The following subsections provide a summary of the analysis provided in the 2018 LRDP EIR followed by an explanation of why no change in the previously identified impacts would result from the proposed Update to the 2018 LRDP, either as a result of proposed changes in the LRDP, circumstances under which the Update to the 2018 LRDP is undertaken, or new information of substantial importance.

4.1.1 Agriculture and Forestry Resources

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP to agriculture and forestry resources are described in Section 4.1.1 of the 2018 LRDP EIR. The 2018 LRDP EIR identified that the UC San Diego campus is designated as Urban and Built-Up Land or Other Land and that there is no Prime Farmland, Farmland of Statewide Importance, or Unique Farmland within the campus. As the UC is constitutionally exempt from local zoning and land use plan/element requirements, land owned by the UC is not subject to Williamson Act contracts. As such, the 2018 LRDP EIR concluded the proposed 2018 LRDP would not result in the conversion of designated farmland, Williamson Act contract lands, or land otherwise used for agricultural purposes to non-agricultural uses, and there would be no impact to agricultural resources.

The 2018 LRDP EIR also describes that there is no forest land, timberland, or timberland zoned "Timberland Production" within or adjacent to UC San Diego campus. The 42 acres of Historic Grove and approximately 56 acres of Urban Forest that are part of the Open Space Preserve on campus are not considered forest land resources since these areas do not support 10 percent cover of a native tree species nor allow for management of one or more forest resources. Given the lack of forest land within or adjacent to the campus, the 2018 LRDP EIR concluded there would be no impact to forestry resources.

Update to the 2018 LRDP

There is no change in the condition of the UC San Diego campus related to agriculture or forestry resources. The campus remains designated as Urban and Built-Up Land or Other Land (California Department of Conservation [DOC] 2018) and lacks forestry resources. Therefore, the proposed Update to the 2018 LRDP would not result in the conversion of agricultural or forest lands to other uses. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. There would be no impact with respect to agricultural or forestry resources, consistent with the conclusions in the 2018 LRDP EIR.

4.1.2 Geology and Soils

The potential impacts of the 2018 LRDP to geology and soils are described in Section 3.5, Geology and Soils, of the 2018 LRDP EIR. Appendix G of the CEQA Guidelines has been updated since certification of the 2018 LRDP EIR to include the evaluation of potential paleontological resources impacts under the issue area of Geology and Soils rather than Cultural Resources. As such, the evaluation below also provides a summary of the paleontological resource analysis that was provided in Section 3.4, Cultural and Tribal Cultural Resources, of the 2018 LRDP EIR.

4.1.2.1 EXPOSURE TO SEISMIC-RELATED HAZARDS

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP related to seismic hazards are described in Section 3.5.3.1 of the 2018 LRDP EIR. While no known, active faults occur within the campus and ground rupture is, therefore, considered unlikely to occur, the presence of faults within the region present potential hazards from ground shaking, ground failure or liquefaction, and landslides. The potential for liquefaction is considered low at the campus due to the density of underlying formational materials and the depths of groundwater. Landslides are primarily anticipated to occur on or downslope from steep slopes on campus. The 2018 LRDP EIR identifies that UC San Diego minimizes seismic hazards to buildings and other structures by reviewing and approving building plans for compliance with the CBC, complying with the UC Seismic Safety Policy for nonstructural building elements, upgrading seismically deficient buildings, and incorporating seismic-related emergency procedures into departmental emergency response plans. Therefore, the 2018 LRDP EIR concluded impacts related to seismic hazards, including fault rupture ground shaking, ground failure or liquefaction, and landslides, would be less than significant.

Update to the 2018 LRDP

No change in the potential for seismic hazards has occurred since certification of the 2018 LRDP EIR. It remains the case that development under the Update to the 2018 LRDP could be exposed to ground shaking and though less likely, ground failure, liquefaction, or landslides. All development on campus would be required to comply with the CBC and UC Seismic Safety Policy, which minimize these potential hazards. Therefore, with continued implementation of these policies, future development would not be exposed to substantial hazards from seismic events. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.2.2 SOIL EROSION OR TOPSOIL LOSS

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP to soil erosion and topsoil loss are described in Section 3.5.3.2 of the 2018 LRDP EIR. Impacts related to erosion during operations were addressed in Section 3.8.3.1 of the 2018 LRDP EIR, which concluded impacts would be less than significant. During construction, erosion was anticipated to occur or be accelerated by site preparation activities, such as vegetation and hardscape removal, and excavation or grading activities associated with development. While earth-disturbing activities would be temporary, the 2018 LRDP

EIR identifies that UC San Diego would implement dust control measures as well as erosion and sediment control BMPs in accordance with SDAPCD regulations, the UC San Diego Design Guidelines, and UC San Diego's Stormwater Management Program. With the continued implementation of these measures, the 2018 LRDP EIR concluded that substantial erosion or topsoil loss would be unlikely to occur and impacts would be less than significant.

Update to the 2018 LRDP

Development under the proposed Update to the 2018 LRDP would continue to be required to comply with SDAPCD regulations, the UC San Diego Design Guidelines, and UC San Diego's Stormwater Management Program. These regulations require the implementation of BMPs that would prevent soil erosion and topsoil loss during construction. Therefore, no new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.2.3 GEOLOGIC STABILITY

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP related to geologic stability (compressible soils, slope instability, and coastal bluffs) are described in Section 3.5.3.3 of the 2018 LRDP EIR. Loose or compressible soils subject to settlement under increased loads or moisture content may be found at UC San Diego where there are deposits of alluvium or slope wash/colluvium or areas with undocumented and/or uncompacted fill. Treatment for compressible soils typically involves removal and replacement with properly compacted fill, compaction grouting, or deep dynamic compaction.

Potential hazards associated with slope instability may include surficial failures, earthflows, debris flows, mudslides, rockfalls, soil creep, or erosion; however, steep slopes can typically be stabilized, and all conditions present at UC San Diego were anticipated to be controlled with standard planning and design techniques. Coastal bluffs, which are susceptible to slope failure due to erosion by wave action, occur along the western margins of SIO, which is protected by a seawall, and west of the Torrey Pines Gliderport, just beyond UC San Diego land. Setbacks from the seawall and coastal bluffs as well as stabilization of the bluffs were anticipated to sufficiently avoid potential hazards related to coastal bluff slope failure. Geotechnical investigations are required to be completed during the planning and design phases of development projects in order to comply with the UC Seismic Safety Policy, which requires compliance with CBC. Section 1803 of the CBC would make project design recommendations intended to decrease risks such as compressible soils, slope stability, and coastal bluffs. Therefore, the 2018 LRDP EIR concluded compliance with the CBC would reduce hazards related to geologic stability and impacts would be less than significant.

Update to the 2018 LRDP

Loose and compressible soils, slopes, and coastal bluffs remain potential hazards to the campus related to geologic stability. As anticipated in the 2018 LRDP EIR, coastal bluff failure has increased over time. However, these potential hazards have been addressed via project design or siting requirements. Geotechnical investigations would continue to be required by the UC Seismic Safety Policy for development under the Update to the 2018 LRDP SEIR in compliance with CBC Section

1803, and such investigations would provide recommendations to avoid or minimize potential hazards related to compressible soils, slope stability, and coastal bluffs. Therefore, no new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.2.4 EXPANSIVE SOILS

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP to expansive soils are described in Section 3.5.3.4 of the 2018 LRDP EIR. Expansive soils at UC San Diego were identified in the Chesterton Series soils, which contain clayey subsoils, and colluvium. Shrinking and swelling of expansive soils can be detrimental to foundations, concrete slabs, flatwork, and pavement. However, proper fill selection, moisture control, compaction during construction, or expansive soil treatment can prevent these soils from causing significant damage. The UC Seismic Safety Policy requires compliance with CBC Section 1803, which requires that a geotechnical investigation be conducted for projects to include provisions for construction on expansive soils. The 2018 LRDP EIR expansive soil impacts would be less than significant given continued adherence to the CBC.

Update to the 2018 LRDP

It remains the case that expansive soils occur within campus and, therefore, have the potential to affect building foundations constructed in these soils. However, consistent with the analysis in the 2018 LRDP EIR, development proposed under the Update to the 2018 EIR would be required to comply with CBC Section 1803 and applicable recommendations of a geotechnical investigation, which would address potentially expansive soils. If identified within a specific site, expansive soil removal, compaction, or treatment would be required during construction to avoid damage related to expansive soils. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.2.5 ALTERNATIVE WASTEWATER SYSTEMS

Summary of 2018 LRDP EIR

Section 3.5.5 of the 2018 LRDP EIR describes there is no potential for the 2018 LRDP to result in an impact related to alternative wastewater systems. Alternative wastewater systems are those that could be implemented where sewers are not available for the disposal of wastewater. The campus is served by the City of San Diego's sewer system and no septic tanks or alternative wastewater systems are needed to serve development within the campus; therefore, no further analysis of this topic was provided.

Update to the 2018 LRDP

Development under the Update to the 2018 LRDP would continue to connect to the City of San Diego sewer system and no septic tanks would be constructed. As described in Chapter 3.12, future sewer flows generated by development under the Update to the 2018 LRDP and other existing and future development associated with UC San Diego and nearby City neighborhoods are anticipated to

exceed the capacity of the City's 24-inch trunk sewer main (UCSD Trunk Sewer). An assessment of this main, along with its potential upsizing and/or the construction of a wastewater treatment plant would be required per mitigation measures Util-1 and Util-2. These would not be considered alternative wastewater systems, as sewer mains and related pipelines would ultimately convey flows. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Mitigation measures would not be required, consistent with the conclusions in the 2018 LRDP EIR.

4.1.2.6 PALEONTOLOGICAL RESOURCES

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP to paleontological resources are described in Section 3.4.3.3 of the 2018 LRDP EIR. Geologic units are assigned paleontological sensitivity levels based on their potential to yield significant fossil remains. The 2018 LRDP EIR concluded that development in areas with low to moderate potential for paleontological resources would result in less than significant impacts. Geologic units underlying the UC San Diego campus that are considered regionally to be of high paleontological sensitivity are Ardath Shale, Scripps Formation, and the Old Paralic Deposits (Bay Point Formation). Ground-disturbing activities within these geologic formations for development under the 2018 LRDP was determined to have a potentially significant impact to paleontological resources. Mitigation measure Cul-3 required construction monitoring for potential impacts to formations with a high sensitivity for paleontological resources (as shown in 2018 LRDP EIR Figure 3.4-2) and the 2018 LRDP EIR concluded that, with implementation of mitigation measure Cul-3, impacts to paleontological resources would be reduced to a less than significant level.

Update to the 2018 LRDP

No changes in the geologic formations underlying the campus or their potential to contain paleontological resources have occurred since the 2018 LRDP EIR. Mitigation measure Cul-3 would continue to reduce potential impacts to paleontological resources by requiring construction monitoring for disturbances of formations with a high sensitivity for paleontological resources as shown in 2018 LRDP EIR Figure 3.4-2. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Mitigation measure Cul-3 would be required and would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measure

Applicable measure from the 2018 LRDP EIR:

Geo-1 **Construction Monitoring for Paleontological Resources**.[1] Grading and excavation equating to 1,000 cubic yards or more at depths of 10 feet or greater within highly sensitive geologic formations (i.e., Ardath Shale, Scripps Formation,

[1] To align with Appendix G of the CEQA Guidelines that has been updated since certification of the 2018 LRDP EIR, the mitigation measure previously labeled "Cul-1" (addressing paleontological resources) has been renamed "Geo-1." This reflects the evaluation of paleontological resources impacts under the issue area of Geology and Soils rather than Cultural Resources.

and Old Paralic Deposits) shall require monitoring by a qualified paleontologist, including the following measures:

i. Prior to beginning any work that requires paleontological monitoring:

   a. a preconstruction meeting shall be held that includes the qualified paleontologist, Construction Manager and/or Grading Contractor, and other appropriate personnel so the qualified paleontologist can make comments and/or suggestions concerning the monitoring program to the Construction Manager and/or Grading Contractor.

   b. the qualified paleontologist shall (at that meeting or subsequently) submit to the Project Manager a copy of the site/grading plan (reduced to 11 x 17 inches) that identifies areas to be monitored as well as areas that may require delineation of grading limits.

   c. the qualified paleontologist shall also coordinate with the Project Manager on the construction schedule to identify when and where monitoring is to begin and to specify the start date for monitoring.

ii. The qualified paleontologist shall document monitoring activity on a standardized form. A record of daily activity shall be sent to Campus Planning and the Project Manager each month.

iii. The qualified paleontologist shall be present initially during all earth-moving activities. After 50 percent of the excavations are complete within the unit, if no significant fossils have been recovered, the level of monitoring may be reduced or suspended entirely at the qualified paleontologist's discretion and in consultation with Campus Planning. These deposits may be included in those identified as Undifferentiated Tertiary Sedimentary deposits in Figure 3.5-1.

iv. Discoveries
   a. Discovery Process – In the event of a discovery, and when requested by the qualified paleontologist, the Project Manager shall be contacted and shall divert, direct, or temporarily halt ground-disturbing activities in the area of discovery to allow for preliminary evaluation of potentially significant paleontological resources. The paleontologist shall also immediately notify Campus Planning of such findings at the time of discovery.
   b. Determination of Significance – The significance of the discovered resources shall be determined by the paleontologist in consultation with the Project Manager and Campus Planning, who must concur with the evaluation before grading activities will be allowed to resume.
   c. Documentation and Treatment of Finds – Based on the scientific value and/or uniqueness of the find, the qualified paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. If treatment and salvage are required, recommendations shall be consistent with Society of Vertebrate Paleontology 2010 guidelines and currently accepted scientific practice. Work in the affected area may resume once the fossil has been assessed and/or salvaged and a paleontological monitor is present.

v. Notification of Completion – The paleontologist shall notify Campus Planning in writing of the end date of monitoring.

vi. Handling and Curation of Significant Paleontological Specimens and Letter of Acceptance – The paleontologist shall ensure that all significant fossils collected are appropriately prepared and permanently curated with an appropriate institution, and that a letter of acceptance from the curation institution has been submitted to Campus Planning.

vii. Final Results Reports (Monitoring and Research Design and Recovery Program) – Prior to completion of the project, two copies of the Final Results Report (even if no significant resources were found) and/or evaluation report, if applicable, which describe the results, analysis, and conclusions of the Paleontological Monitoring Program (with appropriate graphics) shall be submitted to Campus Planning for approval.

4.1.3 Hazards and Hazardous Materials

4.1.3.1 TRANSPORT, USE, AND DISPOSAL OF HAZARDOUS MATERIALS

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP resulting from the transport, use, and disposal of hazardous materials are described in Section 3.7.3.1 of the 2018 LRDP EIR. Generally, the 2018 LRDP EIR anticipated the transport, use, and disposal of hazardous materials, including biohazardous materials, would increase in proportion to the growth of the campus, but the types of hazardous chemicals in use would not change with the 2018 LRDP. The use of biohazardous materials on campus would increase with the increase in biomedical research; however, no Biosafety Level 4 laboratories were anticipated and development of one would require separate environmental review. The increased use and associated disposal of hazardous and biohazardous materials would not result in significant risks to employee health, the public, or the environment given adherence to applicable regulatory requirements and campus guidelines/practices. Transport of hazardous wastes would be handled by the UC San Diego EH&S or a licensed hazardous waste contractor and would conform with federal, state, and local legal requirements.

The 2018 LRDP EIR also notes some campus buildings contain asbestos, lead paint, or fluorescent light ballasts containing polychlorinated biphenyls, and demolition of these buildings could release these hazardous materials. If contamination is present, exposure would be minimized through required worker training, appropriate engineering and administrative controls, and protective equipment in accordance with existing campus practices as well as with federal and state regulations. Overall, compliance with existing regulatory requirements and UC San Diego programs and policies would reduce the potential risks related to hazardous materials. Therefore, the 2018 LRDP EIR concluded impacts would be less than significant.

Update to the 2018 LRDP

Similar to the 2018 LRDP, the proposed increase in building space and campus populations under the Update to the 2018 LRDP could result in an increase in the transport, use, and disposal of hazardous materials. However, no substantial change in the types of hazardous materials used on

campus would occur. UC San Diego would continue to implement existing safety programs and be required to adhere to state and federal laws and regulations related to hazardous materials. Demolition of buildings containing hazardous materials would also continue but would be addressed through campus policies and existing federal and state regulations. As such, the Update to the 2018 LRDP would not result in a substantial hazard related to the transport, use, or disposal of hazardous materials. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.3.2 ACCIDENTAL RELEASES

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP as a result of accidental releases are described in Section 3.7.3.2 of the 2018 LRDP EIR. Compliance with federal, state, and local regulations related to the use, transport, and disposal of hazardous materials, described above, would minimize the potential for accidental release and provide for prompt and effective cleanup if an accidental release would occur. If munitions debris or munitions and explosives of concern are inadvertently encountered, contractors are also required to follow the UC San Diego Solis Management Policy and Ammunitions Awareness Program, which help prevent risks to humans or the environment. If other hazardous material is encountered, EH&S would follow the Consolidated Emergency Response/Contingency Plan, UC San Diego's Hazardous Materials Business Plan, and conduct a comprehensive assessment in coordination with the appropriate regulatory authority. Adherence to these plans and policies would prevent a significant risk in the event of the accidental release of hazardous materials. As such, the 2018 LRDP EIR concluded implementation of the 2018 LRDP would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions and impacts would be less than significant.

Update to the 2018 LRDP

A slight increase in the amounts of hazardous materials used on campus could occur under the Update to the 2018 LRDP; however, compliance with existing regulations and campus programs would continue to minimize the potential for accidental release and guide appropriate cleanup in the event of an accidental release. Inadvertent finds during construction would continue to require implementation of the UC San Diego plans described in the 2018 LRDP EIR, which are updated in accordance with current regulations and campus activities. As identified in the 2018 LRDP EIR, regulatory compliance would prevent a significant risk in the event of the accidental release of hazardous materials. Therefore, no new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.3.3 HAZARDS TO NEARBY SCHOOLS

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP to schools as a result of hazardous material use are described in Section 3.7.3.3 of the 2018 LRDP EIR. The 2018 LRDP EIR identified the following schools within one-quarter mile of the campus: the Preuss Charter School (on UC San Diego's East Campus), La Jolla Country Day School, Doyle Elementary School, and the UC San Diego Early

Childhood Education Center (on UC San Diego's East Campus). As these schools occur within one-quarter mile of the campus, hazardous materials or waste could be handled within one-quarter mile of a school; however, these materials would not exist in quantities significant enough to pose a risk to occupants of the school or the campus community. In addition, use and transport of hazardous materials would continue to comply with federal and state regulations as well as campus programs, practices, and procedures pertaining to hazardous waste. As such, the 2018 LRDP EIR concluded impacts to those attending existing or proposed schools would be less than significant.

Update to the 2018 LRDP

In addition to those schools identified in the 2018 LRDP EIR, Nierman Preschool, located at the Lawrence Family Jewish Community Center east of Regents Road, occurs within one-quarter mile of the campus. Consistent with the analysis in the 2018 LRDP EIR, hazardous materials or waste could be handled within one-quarter mile of this school, but this would not occur in quantities that would generate a risk to attendees of this school. Further, the slight increase in the quantity of hazardous materials used on campus would not be substantial enough to generate a hazard for schools within one-quarter mile of UC San Diego. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.3.4 LISTED HAZARDOUS MATERIALS SITES

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP related to listed hazardous materials sites are described in Section 3.7.3.4 of the 2018 LRDP EIR. The 2018 LRDP was proposed on a site (i.e., the UC San Diego campus) included on a list compiled pursuant to Government Code Section 65962.5 (Cortese List) based on the former Camp Matthews military training use. There is limited potential for munitions debris or munitions and explosives of concern to be encountered during construction within the campus; however, given a lack of information on site closure activities, additional tanks or associated contamination may remain and be encountered during construction activities. In addition, while leaking underground storage tank (UST) cases are closed or have a low likelihood to present an environmental concern, residual contamination could be present and encountered during construction. The UC San Diego Soils Management Policy requires soil sampling to determine the presence of hazardous materials or wastes prior to soil disturbance or placement, including geotechnical field investigations, which would reduce the potential for listed hazardous materials sites to create a significant hazard. However, because listed hazardous material sites exist in areas where development under the 2018 LRDP could occur, the 2018 LRDP EIR considered the impact to be potentially significant. Mitigation measures Haz-4A through Haz-4C require preliminary site review by EH&S, additional assessment or remediation as necessary, and consultation with EH&S in the event unanticipated contamination is encountered during construction. With the implementation of mitigation measures Haz-4A through Haz-4C, the 2018 LRDP EIR concluded impacts related to listed hazardous materials sites would be less than significant.

Update to the 2018 LRDP

The UC San Diego campus remains located on a listed hazardous materials site as a result of past military use and the potential for contaminated materials to be encountered during construction. In

addition, a new case related to a hydraulic oil leak at the Tuolumne Apartments on campus has been opened and closed since certification of the 2018 LRDP EIR; however, this site was not included on the Cortese List given cleanup action occurred (State Water Resources Control Board 2023). Given the presence of hazardous materials sites within the campus as well as the potential for unknown contamination sites to be encountered during construction, the Update to the 2018 LRDP could similarly result in potentially significant impacts. As such, mitigation measures Haz-4A through Haz-4C would continue to be required for projects implemented under the Update to the 2018 LRDP. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Mitigation measures Haz-4A through Haz-4C would be required and would reduce impacts to a level that is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

Mitigation Measures

Applicable measures from the 2018 LRDP EIR:

Haz-4A During project planning, EH&S shall be consulted in order to identify if any past contamination, USTs, ASTs, or other contamination could potentially occur in areas to be impacted. EH&S will consider the cases on file at the County of San Diego Department of Environmental Health (DEH) and information on historical uses in the area to be impacted such as old maps and photos. If EH&S determines that there is limited potential for contamination to occur on site, no additional mitigation is necessary. If it is determined that contamination has potential to exist on a project site, mitigation measure Haz-4B shall be implemented.

Haz-4B If contamination exists on a proposed project site and if it poses a risk to human health or the environment, actions shall be taken prior to any construction, pursuant to applicable regulations, to remove or otherwise remediate the contamination through appropriate measures such as natural attenuation, active remediation, and engineering controls. Assessment and remediation activities shall incorporate the following conditions:

i. All assessment and remediation activities shall be conducted in accordance with a work plan that is approved by the regulatory agency having oversight of the activities.

ii. It may be necessary to excavate existing soil within the project site, or to bring fill soils into the site from off-site locations. At sites that have been identified as being contaminated or where soil contamination is suspected, appropriate sampling and classification are required prior to disposal of excavated soil. Contaminated soil shall be properly disposed of at an approved off-site facility. Fill soils also shall be sampled to ensure that imported soil parameters are within acceptable levels.

iii. Caution shall be taken during excavation activities near existing groundwater monitoring wells, so that they are not damaged. Existing groundwater monitoring wells may have to be abandoned and reinstalled if they are located in an area that is undergoing redevelopment.

Haz-4C In the event that USTs, not identified in consultation with EH&S, or undocumented areas of contamination are encountered during construction or redevelopment activities, work shall be discontinued until appropriate health and safety procedures are implemented. Either the County of San Diego DEH or the San Diego RWQCB, depending on the nature of the contamination, must be notified regarding the contamination. Each agency and program within the respective agency has its own mechanism for initiating an investigation. The appropriate program (e.g., the DEH Local Oversight Program for tank release cases, the County of San Diego DEH Voluntary Assistance Program for non-tank release cases, the RWQCB for non-tank cases involving groundwater contamination) will be selected based on the nature of the contamination identified. The contamination remediation and removal activities will be conducted in accordance with pertinent regulatory guidelines, under the oversight of the appropriate regulatory agency.

4.1.3.5 HAZARDS FROM NEARBY AIRPORTS

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP as a result of airport hazards are described in Section 3.7.3.5 of the 2018 LRDP EIR. The 2018 LRDP EIR identifies that the campus is approximately three miles from MCAS Miramar but is outside of the accident potential zone for this airport. The Torrey Pines Gliderport is situated half on campus and half on City land; however, gliders do not take-off or land over UC San Diego structures. Therefore, the 2018 LRDP EIR concluded the UC San Diego campus is not at risk of safety hazards associated with activity from MCAS Miramar or the Torrey Pines Gliderport and impacts associated with aircraft safety hazards would be less than significant.

Update to the 2018 LRDP

The airport land use compatibility plan for MCAS Miramar has not been updated since certification of the 2018 LRDP EIR; however, an updated Air Installations Compatible Use Zones Study was released in 2020 and the campus remains outside of the identified accident potential zones (MCAS Miramar 2020). No substantial change in the use of the Torrey Pines Gliderport has occurred and gliders would continue to take-off and land away from the campus on both campus-owned and City-owned portions of the Torrey Pines Gliderport. In addition, the Federal Aviation Administration (FAA) requires under Title 14 of the CFR Part 77 that certain proposed structures undergo an Obstruction Evaluation / Airport Airspace Analysis review process to determine if safety hazards to aviation would ensue as a result of their construction (FAA 2024). This would be done as needed during the planning of projects that could affect Torrey Pines Gliderport operations under the Update to the 2018 LRDP. Therefore, no aircraft hazard would occur as a result of the Update to the 2018 LRDP. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.3.6 EMERGENCY RESPONSE AND EVACUATION PLANS

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP related to emergency plans are described in Section 3.7.3.6 of the 2018 LRDP EIR. UC San Diego trains and equips campus emergency response personnel to respond to hazardous materials emergencies and rarely requires outside assistance, which would not change with the increase in hazardous materials use under the 2018 LRDP. UC San Diego prepares and updates its Hazardous Materials Business Plan on an annual basis or within 30 days of specified changes in the use of hazardous materials. In addition, UC San Diego implements safety training, assigns a Building Safety Coordinator, and develops an Illness and Injury Prevention Plan, Laboratory Chemical Hygiene Plan, and Emergency Action Plan for all new buildings. UC San Diego has an Emergency Operations & Incident Management Plan identifying procedures to follow in the event of an emergency. While not part of the 2018 LRDP, the 2018 LRDP EIR notes UC San Diego's coordination and funding contribution for a new fire station at the northwest corner of campus that would improve fire protection and emergency services on campus and to the north of the campus (Fire Station 52 that became operational in October 2024).

The 2018 LRDP EIR notes campus development would continue to include fire access adherent to the California Fire Code with coordination between the UC San Diego Fire Marshal and City Deputy Fire Marshal. Access routes would be reflected on the campus emergency access route map. However, construction-related road closures could interfere with emergency response and evacuation. While it is UC San Diego procedure to provide multiple emergency access or evacuation routes during temporary roadway closures or traffic pattern changes, these procedures are not mandated by law and, therefore, the impact from lane closures was considered potentially significant. Mitigation measure Haz-6 requires notification of lane or roadway closures be provided to the UC San Diego Fire Marshal, campus community, and, if determined necessary, local emergency service providers. With implementation of mitigation measure Haz-6, the 2018 LRDP EIR concluded impacts related to emergency plans would be less than significant.

Update to the 2018 LRDP

An updated analysis of emergency response and evacuation plans is provided in the wildfire impact discussion in Section 3.13.3.1 of this SEIR. Section 3.13.3.1 concludes that impacts to emergency response and evacuation plans would be reduced to a less than significant level with mitigation, consistent with the conclusion in the 2018 LRDP EIR.

4.1.3.7 WILDLAND FIRES

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP related to wildland fires are described in Section 3.7.3.7 of the 2018 LRDP EIR. The 2018 LRDP EIR concluded impacts related to wildland fires would be less than significant.

Update to the 2018 LRDP

Since the certification of the 2018 LRDP EIR, wildfire was added to Appendix G of the CEQA Guidelines as a separate topic from hazards and hazardous materials; as such, further discussion of

the potential impacts of the Update to the 2018 LRDP with respect to wildland fires is provided in Section 3.13, Wildfire. As described in that section, impacts would be less than significant and no mitigation would be required, consistent with the conclusion in the 2018 LRDP EIR.

4.1.4 Hydrology and Water Quality

The following discussion organizes the analysis of hydrology and water quality impacts according to the current thresholds contained in Appendix G of the CEQA Guidelines. These topics have been consolidated from those analyzed in the 2018 LRDP EIR but generally cover the same water quality and hydrology standards.

4.1.4.1 WATER QUALITY

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP to water quality are described in Section 3.8.3.2 of the 2018 LRDP EIR. Wastewater discharges from SIO and industrial stormwater discharges from Fleet Services that are regulated under individual or industrial NPDES permits were not anticipated to be modified. Construction proposed under the 2018 LRDP could increase discharges of pollutants to receiving waters but would implement BMPs in accordance with the Construction General Permit or a Water Pollution Control Plan where the Construction General Permit does not apply, such that construction period pollutant discharges would not violate water quality standards. Long-term operation of new development could similarly discharge pollutants to receiving waters; however, new development would be required to comply with UC San Diego Design Guidelines, UC San Diego's Phase II Small Municipal Separate Storm Sewer Systems (MS4) NPDES permit, and associated Storm Water Management Program via the implementation of site design, source control, and treatment BMPs to prevent pollutants from reaching receiving waters. The 2018 LRDP EIR concluded impacts to water quality would be less than significant with ongoing implementation of UC San Diego policies and programs related to runoff.

Update to the 2018 LRDP

The types of pollutants generated by construction and operation of the 2018 LRDP would not be substantially altered under the Update to the 2018 LRDP. Construction would continue to generate discharges that would be managed via BMPs listed in the applicable Construction General Permit or Water Pollution Control Plan. UC San Diego's Phase II Small MS4 NPDES permit requires construction projects to eliminate or reduce pollutants from being discharged into the storm water system from project sites during and after construction and to reduce storm water runoff from the project site using Low Impact Development (LID). As such, developments would be required to implement long-term site design, source control, and treatment BMPs to treat discharges during operation. Development under the Update to the 2018 LRDP would require compliance with these stormwater management programs and permits, thereby minimizing potential water quality impacts. In addition, a Climate Change Action Plan is being prepared as a condition in conjunction with UC San Diego's NPDES permit for seawater and storm water discharge at SIO. The plan will identify steps being taken to address flooding, sea level rise, volatile rain period impacts; impacts on seawater intake water quality (such as harmful algae blooms); impacts on the operation of seawater and storm water treatment systems and on the quality of the seawater and storm water discharge.

No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.4.2 GROUNDWATER

Summary of 2018 LRDP EIR

Section 3.8.5 of the 2018 LRDP EIR describes there is no potential for the 2018 LRDP to result in an impact related to groundwater supplies or recharge. This conclusion is because the campus uses potable and recycled water supplied by the City of San Diego PUD rather than groundwater and new development would implement LID measures that promote, rather than interfere with, the infiltration of groundwater. Therefore, the 2018 LRDP EIR concluded that no impact to groundwater would occur.

Update to the 2018 LRDP

Consistent with the analysis in the 2018 LRDP EIR, development under the proposed Update to the 2018 LRDP would not result in substantial effects to groundwater. No substantial change in impervious surface area would occur such that groundwater recharge would be inhibited, and the campus would continue to use water supplied by the City of San Diego. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.4.3 SITE DRAINAGE AND HYDROLOGY

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP to drainage patterns are described in Sections 3.8.3.1 and 3.8.5 of the 2018 LRDP EIR. Construction activities were anticipated to result in localized alteration of drainage patterns and temporarily increase erosion and sedimentation in the construction area; however, as described above, all construction-related activities associated under the 2018 LRDP were required to comply with UC San Diego's Design Guidelines and additional Storm Water Management Requirements for Construction Projects. An overall increase in stormwater flow was anticipated to result from the 2018 LRDP but all projects would be required to comply with the UC San Diego Design Guidelines, the UC San Diego Storm Water Management Program, and other regulatory requirements to accommodate potential runoff in the long-term with LID features and BMPs. Development projects would also be reviewed in the context of existing infrastructure to identify capacity constraints and determine whether system improvements would be required to support the specific development. Drainage alternations would not impede or redirect flood flows as a result of changes in drainage patterns given the campus is located outside of the 100- and 500-year floodplains. Therefore, the 2018 LRDP EIR concluded impacts associated with drainage and hydrology alteration would be less than significant.

Update to the 2018 LRDP

The Update to the 2018 LRDP could potentially alter drainage patterns; however, most of the development would be infill, which would limit significant changes to campus drainage.

Construction activities would continue to adhere to UC San Diego's Design Guidelines and Storm Water Management Requirements, to prevent erosion or polluted runoff. As recommended in the Drainage Study prepared for the Update to the 2018 LRDP, infill development would incorporate LID features, which are anticipated to increase pervious surfaces at these sites. Additionally, regional water quality devices would be implemented in major drainage basins to centralize stormwater treatment. Development on previously undeveloped portions of campus could result in an overall increase in pervious surfaces and stormwater flow. Campus development under the Update to the 2018 LRDP would comply with UC San Diego Design Guidelines, the UC San Diego Storm Water Management Program, and other regulatory requirements to manage runoff and enhance the stormwater system where needed. Therefore, the Update to the 2018 LRDP would not result in substantial alterations to drainage or hydrology. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.4.4 FLOOD HAZARDS

Summary of 2018 LRDP EIR

Section 3.8.5 of the 2018 LRDP EIR describes there is no potential for the 2018 LRDP to result in impacts related to the placement of structures, including residences, in flood hazard areas given the campus is located outside of 100-year and 500-year floodplains. The 2018 LRDP EIR further describes that the 2018 LRDP would not result in significant risks related to flooding from levee or dam failure given the elevation of the campus and its distance from levees and dams in inland San Diego County.

The potential impacts of the 2018 LRDP to hazards from seiche, tsunami, or mudflow are described in Section 3.8.3.3 of the 2018 LRDP EIR. The 2018 LRDP EIR notes the campus is not subject to inundation by seiche given no land locked bodies of water occur near the campus. The southwestern portion of the SIO campus could be at risk of inundation in the event of a rare and particularly destructive tsunami; however, no tsunamis have affected this portion of the UC San Diego campus and SIO has an Emergency Action Plan addressing the potential for tsunamis. Additionally, warnings are generated when earthquakes of sufficient magnitude to generate a tsunami occur. Inundation by mudflows was considered unlikely on most of campus, and where possible due to low-lying areas, no development was proposed such that a mudflow would result in inundation for structures. The 2018 LRDP EIR concluded impacts associated with potential inundation would be less than significant.

Update to the 2018 LRDP

The UC San Diego campus remains outside of the 100-year and 500-year floodplains on maps that have been updated since certification of the 2018 LRDP EIR (Federal Emergency Management Agency 2019). There are no new, land locked bodies of water that could generate a seiche affecting the campus and the risk of tsunami at SIO remains consistent with that identified in the 2018 LRDP EIR. Therefore, the Update to the 2018 LRDP would not result in a substantial risk of inundation due to flood, seiche, or tsunami. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.4.5 WATER QUALITY PLANS

Summary of 2018 LRDP EIR

This threshold was not specifically addressed at the time the 2018 LRDP EIR was prepared; however, Sections 3.8.3.1 and 3.8.3.2 discuss potential impacts of the 2018 LRDP to water quality and drainage, which are the topics addressed in the SDRWQCB's Water Quality Control Plan for the San Diego Basin (Basin Plan; SDRWQCB 2021). Project-level conformance with this plan is achieved through adherence to permit conditions and regulations established by the SDRWQCB. UC San Diego requires individual developments to conform to UC San Diego Design Guidelines, UC San Diego's Phase II Small MS4 NPDES permit and associated Storm Water Management Program, and other regulatory requirements that address potential water quality impacts. Adherence to these regulations and NPDES permit would contribute to the ability of the San Diego Basin to achieve water quality standards. Therefore, it can be concluded that the 2018 LRDP does not conflict with the applicable water quality control plan. As described above, the campus does not require groundwater supplies and would increase percolation potential on campus; therefore, no conflict with a sustainable groundwater management plan would occur. Impacts would be less than significant.

Update to the 2018 LRDP

The regulatory framework described above would continue to apply to development under the Update to the 2018 LRDP. Compliance with permits issued by the SDRWQCB, through the implementation of appropriate BMPs and other design features, would help protect water quality in the region in accordance with the Basin Plan, both at the project and campus levels. The impact of the Update to the 2018 LRDP would be less than significant and would not result in a new significant impact or a substantial increase in previously identified impacts. Therefore, no mitigation measures would not be required.

4.1.5 Land Use and Planning

Appendix G of the CEQA Guidelines has been updated since certification of the 2018 LRDP EIR to include the evaluation of potential conflicts with habitat conservation plans under the issue area of Biological Resources rather than Land Use and Planning. As such, the evaluation of potential conflicts with habitat conservation plans is provided in Section 3.3, Biological Resources, of this SEIR.

4.1.5.1 COMMUNITY DIVISION

Summary of 2018 LRDP EIR

Section 3.9.5 of the 2018 LRDP EIR describes there is no potential for the 2018 LRDP to result in an impact related to division of and established community, as the community has developed around the campus boundaries and development outside of established campus properties or boundaries was proposed by the 2018 LRDP. Therefore, the 2018 LRDP EIR concluded that no impact would occur.

Update to the 2018 LRDP

The boundaries of the campus addressed in the Update to the 2018 LRDP have been expanded to include the 8980 Villa La Jolla Drive, which was not considered in the 2018 LRDP EIR. This 0.9-acre parcel occurs within an existing commercial center south of West Campus and development proposed by UC San Diego occurs within the boundaries of the existing developed site. Therefore, the Update to the 2018 LRDP would not result in the division of an established community. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.5.2 CONFLICT WITH APPLICABLE LAND USE PLANS, POLICIES, AND REGULATIONS

Summary of 2018 LRDP EIR

Under the Constitutional autonomy as stated in Article 9, Section 9 of the California Constitution, the UC, including UC San Diego, is exempt from local regulations including land-use regulations. As a result, UC has authority over its campus planning process and decisions; however, UC San Diego strives to be compatible with local plans and not conflict with the goals of nearby community plans in the City of San Diego, to the extent feasible in a manner consistent with UC San Diego's educational and research missions. Potential impacts of the 2018 LRDP to land use plans, policies, and regulations are described in Section 3.8.3.1 of the 2018 LRDP EIR. The 2018 LRDP EIR evaluated the potential for conflicts with the California Coastal Act, SANDAG Regional Plan, and 2018 LRDP as applicable land use plans but also considered, for informational purposes only, conflicts with neighboring community plans prepared by the City of San Diego. Development projects on the western portions of the UC San Diego campus within the Coastal Zone are subject to review and approval by the California Coastal Commission. As the applicable land use plan for the campus is the 2018 LRDP, development consistent with the 2018 LRDP would have no land use plan conflict. The 2018 LRDP also supports the SANDAG Regional Plan strategies and objectives by providing two trolley stations, additional alternative modes of transportation, housing on campus, and mixed-use live/learning developments. The City's University and La Jolla Community Plans refer to UC San Diego specifically and provide several goals related to connectivity with the campus connectivity and a shift from car-oriented to transit-oriented design. During project-level reviews, UC San Diego may choose to evaluate consistency with the recommendations of the applicable Community Plans to maintain consistency with local land use plans where feasible and for informational purposes only. The 2018 LRDP EIR concludes that implementation of the 2018 LRDP would not result in applicable land use plan conflicts and impacts would be less than significant.

Update to the 2018 LRDP

The proposed Update to the 2018 LRDP would replace the 2018 LRDP as the applicable land use plan for UC San Diego, and development consistent with this updated plan would not result in land use plan conflicts. The increase in on-campus housing in proximity to transit options would support implementation of the current 2021 Regional Plan (SANDAG 2021), as discussed further in Section 3.10, Transportation and Circulation, of this SEIR. Development proposed within the Coastal Zone (see Figure 3.1-1) would continue to require review and approval by the California Coastal Commission. UC San Diego would also continue to review individual projects for consistency, where feasible for informational purposes only (in light of the UC's constitutional

autonomy from local land use regulation), with the La Jolla Community Plan and the updated version of the University Community Plan (City of San Diego 2024), which emphasize increases in housing and transit access similar to the vision of the Update to the 2018 LRDP. Furthermore, development within the Update to the 2018 LRDP would be designed not to conflict with other existing UC San Diego or UC plans and policies, such as the UC Sustainable Practices Policy. The Update to the 2018 LRDP would not result in conflicts with applicable land use plans and cause associated environmental effects. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Mitigation measures would not be required, consistent with the conclusions in the 2018 LRDP EIR.

4.1.6 Mineral Resources

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP to mineral resources are described in Section 4.1.2 of the 2018 LRDP EIR. The 2018 EIR identified that the UC San Diego campus is classified as Mineral Resource Zone (MRZ)-1, a location where no significant mineral deposits are present, and MRZ-3, an area containing mineral deposits, the significance of which cannot be evaluated from available data. Further, the predominant formational materials underlying the campus (Lindavista and Ardath Shale-Scripps formations) do not contain mineral resources. The campus is not an area slated for mineral resource development or extraction. Therefore, given the absence of mineral resources within the campus, the 2018 LRDP EIR concluded the 2018 LRDP would not result in the loss of availability of mineral resources or a locally important mineral resource recovery site, and no impact would occur.

Update to the 2018 LRDP

Mapping of MRZs in the San Diego region has updated since certification of the 2018 LRDP EIR; however, the campus remains classified as MRZ-1 and MRZ-3 (DOC 2017) and the campus is not designated for mineral resource extraction. The Update to the 2018 LRDP would not result in the loss of mineral resources. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. There would be no impacts to mineral resources, consistent with the conclusions in the 2018 LRDP EIR.

4.1.7 Recreation

4.1.7.1 DETERIORATION OF PARKS AND RECREATIONAL FACILITIES

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP related to recreational facility deterioration are described in Section 3.13.3.1 of the 2018 LRDP EIR. The 2018 EIR identified that the anticipated increase in UC San Diego population growth could result in a related increase in demand for both on- and off-campus recreational facilities and therefore could contribute to the acceleration of deterioration of these facilities. UC San Diego Recreation manages and maintains UC San Diego recreational facilities, the deterioration of which was not apparent as a result of ongoing management and maintenance that would continue to be provided with the proposed 2018 LRDP. New recreational facilities proposed under the 2018 LRDP would also accommodate increased demand for on-

campus recreational facilities. Therefore, the 2018 LRDP concluded impacts to on-campus recreational facilities would be less than significant.

Increased use of privately operated for-profit recreational facilities located off-campus was not considered an adverse impact because it is an economic benefit to those facilities. In addition, off-campus population growth would be spread throughout surrounding communities and off-campus residential developments would have been subject to the Quimby Act (Government Code Section 66477), thereby providing the necessary funding and/or land to develop recreational facilities for these residences. While campus residents could use off-campus public recreational facilities, their use was expected to be limited given the recreational opportunities provided on campus. Therefore, the use of off-campus recreational facilities by campus populations was determined not to substantially contribute to the deterioration of these facilities and the 2018 LRDP concluded impacts would be less than significant.

Update to the 2018 LRDP

The Update to the 2018 LRDP would increase campus population above what was anticipated in the 2018 LRDP EIR and would result in an associated increase in the demand for and use of recreational facilities. However, as described in Section 3.13 of the 2018 LRDP EIR, on-campus recreational facilities would be maintained and improved for the planned campus population. While campus populations living off-campus may also increase the use of off-campus recreational facilities, their use would continue to be spread throughout the surrounding area and be offset by Quimby Act fees paid during development of off-campus residences. The Update to the 2018 LRDP would not require the use of existing parks or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Impacts would be less than significant, consistent with the conclusions in the 2018 LRDP EIR.

4.1.7.2 INCLUSION, CONSTRUCTION, OR EXPANSION OF RECREATIONAL FACILITIES

Summary of 2018 LRDP EIR

The potential impacts of the 2018 LRDP related to the creation of recreational facilities are described in Section 3.13.3.2 of the 2018 LRDP EIR. The 2018 LRDP includes proposed future recreational projects that may have physical effects on the environment. However, like other project types, the construction of these recreational facilities would require project-specific CEQA review prior to approval. This review may be tiered from the environmental analysis provided in this and other sections of the 2018 LRDP EIR. Where necessary, mitigation measures would be implemented to minimize the environmental impacts of these projects. As discussed above, the increased demand for off-campus recreational facilities would be distributed throughout the surrounding communities and would not be substantial, given the available on-campus recreational opportunities. The 2018 LRDP EIR concluded that while the construction of recreational facilities could potentially lead to significant environmental effects, the application of applicable mitigation measures would reduce these impacts to below a level of significance. Since the construction of recreational facilities would not individually contribute to the substantial and unavoidable impact of the 2018 LRDP, the 2018 LRDP EIR concluded this impact would be less than significant.

Update to the 2018 LRDP

Similar to the 2018 LRDP, the Update to the 2018 LRDP would allow for the construction of recreational facilities on campus and would require project-specific CEQA review (tiered or streamlined from this SEIR where applicable) prior to approval of such development. Mitigation measures identified throughout this SEIR would continue to be applied to recreational facility development and are anticipated to reduce potential impacts of these developments to below a level of significance. As described in Section 2.4 of this SEIR, although adjustments to the Sports and Recreation land uses (see Figure 2-3) are proposed under the Update to the 2018 LRDP, recreation space acreages would remain approximately the same and the Update allows for future redevelopment to include improved recreational spaces. In addition, informal recreation spaces, such as outdoor common areas, would be interspersed throughout the campus as part of new development projects. No new significant impacts or a substantial increase in previously identified impacts would occur as a result of the Update to the 2018 LRDP. Mitigation measures specific to recreation impacts would not be required, consistent with the conclusions in the 2018 LRDP EIR.

4.2 Growth Inducement

As required by the CEQA Guidelines, an EIR or SEIR must include a discussion of the ways in which the proposed project could directly or indirectly foster economic development or population growth, or the construction of additional housing and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[d]). Growth can be induced in many ways, including the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of 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." In other words, negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts.

Growth-inducing impacts fall into two general categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped or underdeveloped area. Indirect, or secondary, growth-inducing impacts consist of growth induced in the region by additional demands for housing, goods, and services associated with the population increase caused by or attracted to a new project.

The UC San Diego campus is located in the incorporated communities of University City and La Jolla in the City of San Diego. Students, faculty, and staff that do not live on campus are distributed throughout San Diego County. Potential growth-inducing impacts of the proposed Update to the 2018 LRDP discussed in this section are thus evaluated with respect to San Diego County as a whole and not just the communities within which the campus is located.

4.2.1 Summary of 2018 LRDP EIR

Section 4.2.2 of the 2018 LRDP EIR describes the existing conditions and evaluates the direct and indirect growth inducing impacts of the 2018 LRDP. The EIR concluded that the 2018 LRDP would result in direct inducement of substantial population growth in the area, as a large percentage of the students, faculty, and staff on campus would originate from outside the region. The 2018 LRDP

projected an increase in student enrollment from 32,850 in 2015-16 academic year to as much as 42,400 in 2035. It proposed a corresponding increase in UC San Diego faculty/researcher and staff employment on the campus from 16,000 in 2015-16 academic year to as much as 23,200 in the 2035. The 2018 LRDP proposed to house up to 65-percent of all eligible students, reducing existing demand for off-campus housing; however, existing demand would continue to exist for student off-campus housing. In addition, not all staff and faculty would be accommodated in campus housing, thus resulting in a new demand on available market rate housing in the region.

The 2018 LRDP EIR also concluded that the projected 7,200 increase in faculty and staff would constitute direct employment growth. Apart from the direct jobs on the UC San Diego campus, which would be substantial, operation of the campus under the proposed 2018 LRDP was likely to indirectly induce the creation of new jobs through the purchase of goods and services by the University.

Although the 2018 LRDP EIR would directly induce population growth, growth under the 2018 LRDP did not involve the construction of new roads or utilities that would result in indirect inducement of substantial population growth in the area. All on-campus expansions and extensions would occur within the confines of the campus, and no substantial changes to utilities outside the campus were anticipated to serve the needs of the campus under the 2018 LRDP. In conclusion, the 2018 LRDP EIR determined that the 2018 LRDP would contribute to direct population and employment growth and indirect employment growth in the region.

4.2.2 Update to the 2018 LRDP

Similar to the conclusions of the 2018 LRDP EIR, the proposed Update to the 2018 LRDP would be considered growth inducing in the San Diego County region for a number of specific reasons outlined in the following sections. Substantial changes proposed by the Update to the 2018 LRDP include changes related to an increase in population and anticipated construction associated with the UC San Diego La Jolla campus. The population increases and effects on employment as they relate to growth inducement are discussed below.

4.2.2.1 DIRECT POPULATION, HOUSING, AND EMPLOYMENT GROWTH

Population Growth

The Update to the 2018 LRDP is projected to increase the student population from 42,400 in 2035 to 56,000 in 2040, and faculty/researcher and staff employment is projected to increase from 23,200 in 2035 to 40,300 in 2040. Consistent with the assumptions in the 2018 LRDP EIR, while some of the students, faculty, and staff would originate from the San Diego region, a large percentage would be from outside the region, thus resulting in direct inducement of substantial population growth in the area.

Housing Growth

The proposed Update to the 2018 LRDP would add a total of 12,780 student housing beds, surpassing the 2018 LRDP's original approval. Following implementation of the proposed Update to the 2018 LRDP, the total number of student housing beds would nearly double compared to Fall 2023 numbers (see Table 2-6). The campus maintains a 1:1 bed-to-residential population ratio, regardless of the type of housing (residence halls or apartments). By 2040, new beds would bring

the total student housing supply to 38,620 beds. Consequently, UC San Diego would house at least 65 percent of its total student population (56,000), including students with families on campus, increasing the proportion of students in UC San Diego housing from the current (fall 2023) 46 percent. While the Update to the 2018 LRDP does not propose additional faculty or staff beds above what was already approved in the 2018 LRDP, the additional 2,500 beds anticipated for faculty and staff would not fully accommodate the increase of 17,100 for this population. Furthermore, a large proportion of the additional staff and faculty population would be drawn from the existing regional workforce and would not necessarily require additional housing. The remaining additional faculty and staff are therefore expected to create a demand for residential units in the private off-campus housing market.

While the exact locations of where new off-campus housing demand associated with new faculty and staff would occur cannot be determined with certainty, probable locations can be estimated based on where existing campus faculty and staff reside off-campus. Based on zip code data collected by the campus, existing faculty and staff residences are spread out across various cities and communities in San Diego County, including San Diego, Carlsbad, Chula Vista, Coronado, Encinitas, National City, Poway, Santee, Oceanside, San Marcos, Escondido, Del Mar, Solana Beach, Imperial Beach, and Vista. There is no one area where all faculty and staff reside, though the area surrounding the campus in the City of San Diego has larger concentrations (e.g., University and La Jolla). Thus, under the proposed Update to the 2018 LRDP, new housing demand associated with new faculty and staff is similarly anticipated to be spread out across various cities and communities in the County, with larger concentrations occurring in the City of San Diego.

As discussed in Section 3.8, Population and Housing, of this SEIR, SANDAG projects that most regional housing production from 2022 through 2050 will occur in the City of San Diego. By 2050, the City of San Diego is expected have a total of 606,452 households or approximately 45 percent of the regional total. However, housing production in San Diego County, including the City of San Diego, is not projected to keep pace with population growth in the coming years. The most recent SANDAG RHNA identified a total demand for 171,685 housing units from 2021 through 2029, while the SANDAG Series 15 Regional Growth Forecast projects that the region will produce an incremental supply of approximately 84,368 new housing units. Note that the RHNA factors in the housing needs generated by universities in the region. Based on these numbers, there is an annual projected demand of 19,076 units while only 10,546 units are projected to be delivered (SANDAG 2024). This would result in a 76,771-unit regional housing deficit during this time period (i.e., 2021 through 2029). Therefore, the proposed Update to the 2018 LRDP would result in a new housing demand that cannot be served by the projected supply in the region, consistent with the conclusion in the 2018 LRDP EIR.

As a result of regional demand for housing, including that generated by the Update to the 2018 LRDP, new housing would need to be constructed. The growth in the housing stock in these affected communities undoubtedly would result in some environmental impacts. This SEIR does not attempt to characterize specific environmental effects from the development of off-campus areas as it would be speculative to do so. However, non-University development projects would be required to undergo an environmental review, which would include mitigating any potentially significant adverse environmental effects to the extent feasible Some significant and unavoidable impacts after mitigation may be expected, and by virtue of being a contributor to the regional demand for new housing and urban amenities, the campus would incrementally contribute to these environmental impacts of overall growth in regional housing and other urban amenities.

In addition, the proposed Update to the 2018 LRDP-related population that would reside off campus in regional communities would place additional demand on public services, parks and recreational facilities, and utility services in these affected communities. The potential environmental impacts of this demand in conjunction with the demand due to regional growth on public services, energy, and utility services in the affected communities are discussed under Cumulative Impacts and Mitigation in Section 3.5, Energy; Section 3.9, Public Services; and Section 3.12, Utilities and Service Systems; of this SEIR. Impacts of demand on parks and recreational facilities are discussed above in Section 4.1.7.

Employment Growth

Implementation of the proposed Update to the 2018 LRDP would generate temporary employment opportunities during construction of individual buildings and projects. Because construction workers would likely be drawn from the existing regional work force, construction of projects under the proposed Update are not considered growth-inducing. However, construction-related activities may temporarily affect local air quality, traffic patterns, and noise levels, which would need to be mitigated through best management practices, such as dust control measures and traffic management plans. The proposed Update to the 2018 LRDP would provide an additional approximately 17,100 permanent employment opportunities in the region associated with operation of the campus beyond what was evaluated in the 2018 LRDP EIR. As noted above, a large proportion of the permanent growth of staff and faculty population would also be drawn from the existing regional workforce, although new staff and faculty from outside the region would induce some employment growth.

4.2.3 Indirect Economic Growth

In addition to the direct growth, additional growth could occur as campus-serving and related businesses and institutions establish or expand in response to the increased demand for goods and services or due to the synergies that result between technical specialties on campus and related industries. An example of the synergistic development is the establishment of the numerous biotechnical and telecommunications industries immediately surrounding the campus and in the region; therefore, apart from the direct jobs on the campus, operation of the campus under the proposed Update to the 2018 LRDP would likely result in the creation of new indirect and induced jobs, consistent with the conclusion in the 2018 LRDP EIR. Indirect jobs are those that are created or sustained when the campus purchases goods and services from businesses in the region, and induced jobs are created or sustained when wage incomes of those employed in direct and indirect jobs are spent on the purchase of goods and services in the region.

4.2.4 Indirect Population Growth

While the 2018 LRDP EIR did not include a detailed discussion of indirect population growth, Section 4.2.2 concluded that indirect inducement of substantial population growth would not occur because the 2018 LRDP would not remove obstacles to growth or encourage the construction of new facilities not included in the 2018 LRDP.

As discussed further below under Provision of Infrastructure and in Section 3.8 of this SEIR, development under the proposed Update to the 2018 LRDP would predominantly consist of infill development and redevelopment of existing low-density sites and/or structures on campus to accommodate the proposed population growth and expanded program needs. No new roads would

be constructed, and utility improvements would be sized to accommodate projected campus growth. Therefore, the proposed Update to the 2018 LRDP would not result in indirect inducement of substantial population growth in the area, consistent with the conclusion in the 2018 LRDP EIR.

4.2.5 Provision of Infrastructure

Growth can be triggered if the infrastructure to serve the proposed project is constructed with excess capacity, or if the lack of infrastructure is an obstacle to growth, and that obstacle is removed by the project. The provision of infrastructure under the proposed Update to the 2018 LRDP would accommodate the additional population growth primarily with infill development and redevelopment of existing low-density sites and/or structures on UC San Diego campus. As discussed in Section 3.12, of this SEIR, most utilities are provided to on-campus users by the campus, and therefore, with a few exceptions related to wastewater infrastructure and electrical substation facilities, UC San Diego controls the development of utilities and the distribution systems for the campus. This pattern would continue under the proposed Update to the 2018 LRDP, and as discussed in Section 3.12, utility systems would be expanded and extended to new areas on campus as a result of the demands anticipated under the proposed Update to the 2018 LRDP. This additional infrastructure includes a new electrical substation in West Campus to serve campus needs based on growth under the Update to the 2018 LRDP. Additionally, utility infrastructure upgrades throughout campus to address sewer flows, water supply, and storm water would be sized to service planned growth and would not be sized to accommodate growth beyond what is considered in the Update to the 2018 LRDP. This includes the potential construction of a WWTP that may be required as part of mitigation measure Util-2. This expansion of infrastructure would serve campus uses and reduce the pressures on off-campus infrastructure. All on-campus expansions and extensions would occur within the confines of the campus in conjunction with the growth in building space that would be developed to serve increased enrollment and new academic and research programs and housing initiatives for the campus. The potential environmental effects of the provision of infrastructure within the confines of the campus due to the proposed Update to the 2018 LRDP are discussed in Section 3.12.

In addition, no new roads or road widenings are currently proposed to be constructed as part of the Update to the 2018 LRDP. Thus, growth outside of the UC San Diego campus would not be triggered by provision of infrastructure under the proposed Update to the 2018 LRDP, consistent with the conclusion in the 2018 LRDP EIR.

4.3 Significant and Unavoidable Environmental Impacts

Pursuant to Section 15126.2(b) of the CEQA Guidelines, this section identifies significant impacts that would not be avoided, even with the implementation of feasible mitigation measures. The Regents of the University of California will consider the significance of impacts and the feasibility of mitigation measures as part of their certification action for the SEIR. Sections 3.1 through 3.13 of this SEIR provide a comprehensive identification of potentially significant adverse environmental effects resulting from the proposed Update to the 2018 LRDP and mitigation measures that may be implemented, as well as the level of significance both before and after mitigation. A summary of the environmental impacts and mitigation measures is contained in Executive Summary at the beginning of this SEIR.

Potentially significant and unavoidable environmental impacts associated with implementation of the 2018 LRDP were identified for the following environmental issues:

- Direct violation of air quality standards related to NO_X emissions during construction and PM_{10} emissions during operations;
- Cumulatively considerable air quality impacts associated with a net increase in NO_X emissions during construction and PM_{10} emissions during operations;
- Direct exposure of sensitive receptors to construction and operational toxic air contaminant emissions;
- Direct alteration of historical resources which causes a substantial change in their significance;
- Cumulatively considerable loss of historical resources and tribal cultural resources;
- Direct and cumulatively considerable inducement of substantial population growth;
- Direct population and off-campus housing growth that would be growth inducing to the region; and
- Direct and cumulatively considerable failure to meet LOS transportation standards.

The impacts listed above remain significant and unavoidable under the Update to the 2018 LRDP SEIR, with the following exceptions:

- Direct and cumulatively considerable impacts related to failure to meet LOS transportation standards no longer apply (see SEIR Section 3.10, Transportation).
- Direct and cumulative air quality standard impacts related to construction NO_X emissions would be reduced to a less than significant level with the implementation of the updated mitigation measure AQ-2B (see SEIR Section 3.2, Air Quality).
- Direct and cumulative air quality impacts related to operation (including PM_{10}, VOC, and CO emissions) would be reduced to a less than significant level with the implementation of new mitigation measures AQ-2C and AQ-2D (see SEIR Section 3.2).

Modifications to the 2018 LRDP EIR significance conclusions for the following environmental issues are anticipated under the Update to the 2018 LRDP:

- New direct potential conflict with public school capacity resulting in potential cumulative impact.

For a detailed description of these potentially significant impacts and reasons that they are unavoidable, refer to Section 3.2, Air Quality; Section 3.4, Cultural Resources; Section 3.8, Population and Housing; Section 3.9, Public Services; Section 3.11, Tribal Cultural Resources; and Section 4.2, Growth Inducement, of this SEIR.

4.4 Significant and Irreversible Environmental Effects

Section 15126.2(d) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(d) states:

> 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 improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage would result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Section 4.4 of the 2018 LRDP EIR concluded that the potential for the 2018 LRDP to result in significant irretrievable commitment of resources was less than significant, nor would there be a potential for irreversible environmental damage caused by an accident associated with a proposed project.

Development under the proposed Update to the 2018 LRDP would result in the continued commitment of the UC San Diego campus to campus-related uses, thereby precluding any other uses for the lifespan of the campus. UC San Diego's ownership of the campus represents a long-term commitment of the campus to a university use. Restoration of the UC San Diego campus to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Resources that would be permanently or continually consumed by implementation of the Update to the 2018 LRDP include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in unmitigated significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources. With implementation of the proposed Update to the 2018 LRDP, UC San Diego would continue to implement its various energy conservation and management programs, such as the operation of the cogeneration facility (which supplies approximately 85 percent of the campus's electricity, making the campus less reliant on commercial utility providers); and Energy Management System, which enables central operators to minimize energy consumption by monitoring and controlling HVAC equipment (UC San Diego 2024). UC San Diego would also continue to work in collaboration with public utility providers as

necessary to plan and monitor campus utility demand and to implement expansion of distribution systems as needed to serve the proposed Update to the 2018 LRDP. In addition, as part of UC San Diego's commitment to responsible stewardship of its physical resources, campus development under the proposed Update to the 2018 LRDP would continue to be evaluated for their environmental sustainability, in accordance with the UC Sustainable Practices Policy and future sustainability programs that are developed by the UC during the planning period for the proposed Update to the 2018 LRDP.

Several strategies would be focused on achieving the goal of reducing UC San Diego's GHG emissions over the life of the proposed Update to the 2018 LRDP through 2040, with an emphasis on sustainable growth and operations, including decarbonization of the Central Utilities Plant (as required by GHG-1A). Furthermore, in accordance with the UC Sustainable Practices Policy, the UC San Diego campus would continue to incorporate design features, technological adaptations, and/or planning principles into future campus projects to conserve resources and minimize waste products and comply with LEED standards for building design and operation. Compliance with all applicable building codes and standard campus conservation features would ensure that all natural resources are conserved to the maximum extent practicable. It is also possible that new technologies or systems would emerge, or would become more cost-effective or user-friendly, to further reduce the campus' reliance upon nonrenewable energy resources. Therefore, the potential for the proposed Update to the 2018 LRDP to result in significant irretrievable commitment of resources is less than significant.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with a proposed project. While the UC San Diego campus uses, transports, stores, and disposes of hazardous wastes, the campus complies with all applicable state and federal laws and existing campus programs, practices, and procedures related to hazardous materials, which reduces the likelihood and severity of accidents that would result in irreversible environmental damage. Therefore, the potential for the proposed 2018 LRDP to cause an accident resulting in significant irreversible environmental damage is less than significant, consistent with the conclusion in the 2018 LRDP EIR.

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5.0 Alternatives

CEQA Guidelines Section 15126.6(a) requires that an EIR describe and evaluate a range of reasonable alternatives to the proposed project, or alternatives to the location of the proposed project. The purpose of the alternatives analysis is to explore ways that most of the basic objectives of the proposed project could be attained while reducing or avoiding significant environmental impacts of the project as proposed. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered. The lead agency is responsible for selecting a range of alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. This approach is intended to foster informed decision making and public participation in the environmental process.

This chapter evaluates alternatives to the proposed Update to the 2018 LRDP and examines the potential environmental impacts associated with each alternative. The CEQA Guidelines state that the discussion of alternatives should focus on "…alternatives capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives could impede to some degree the attainment of the project objectives or would be more costly" (CEQA Guidelines Section 15126.6[b]). The CEQA Guidelines further direct that "…the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the project as proposed" (Section 15126.6[d]). CEQA Guidelines Section 15126.6(e) requires that an alternative be included that describes what would reasonably be expected to occur on the project site in the foreseeable future if the proposed Project were not approved, based on current plans and consistent with available infrastructure and community services. This is considered the "No Project Alternative." CEQA Guidelines Section 15126.6(f)(1) states that the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries.

This analysis does not reassess feasibility of the alternatives examined in Chapter 5.0 of the 2018 LRDP EIR, including the four alternatives to the proposed 2018 LRDP that were analyzed (No Project Alternative [2004 LRDP], Redevelopment/Infill Only Alternative, Increased Housing Alternative, and Reduced Project Alternative) and those that were considered but rejected from further analysis (Reduced University Center Alternative and Alternative San Diego County Location for Additional Campus Growth). This section evaluates new alternatives that would reduce impacts identified pursuant to subsequent review standards for the Update to the 2018 LRDP, as summarized in Section 5.1.2, below.

5.1 PROJECT OBJECTIVES AND IMPACTS

To develop and evaluate project alternatives, UC San Diego considered the project objectives and reviewed the potentially significant impacts of the proposed Update to the 2018 LRDP to determine which impacts could be substantially avoided or reduced through an alternative. This section lists the project objectives and presents a summary of the potential impacts from implementation of the Update.

5.1.1 PROJECT OBJECTIVES

As stated in Section 2.3 of this SEIR, the key project objectives associated with the purposes of the proposed Update to the 2018 LRDP are the following:

1. Accommodate projected growth and address life safety and deferred maintenance of existing buildings by demolishing approximately 1.1 million GSF, and providing approximately 8.3 million GSF of net new facilities needed to expand academic and non-academic programs in support of the UC mission and its commitment to excellence in teaching, research and public service;

2. Maintain and support UC San Diego's unique undergraduate college system within the larger University setting to provide undergraduate students with personalized academic services and a close-knit intellectual and social environment outside of their academic department;

3. Locate buildings on campus in accordance with the character, scale, and design goals expressed in the Master Planning Studies, Neighborhood Planning Studies, previous LRDPs, and the LRDP's guiding principles and its required elements;

4. Site future development to allow for the co-location and strengthening of campus programs, facilities, and activities, to continue the exchange of ideas between academics and scientists, and to create synergy between shared resources and services;

5. Activate and enliven the campus through strategic mixed-use and transit-oriented development, improved public spaces, expanded campus services, and additional on-campus housing to facilitate a living-learning campus environment;

6. Complete the redevelopment of the University Center on West Campus as a walkable "town center" featuring a mix of uses, urban densities, and pedestrian-activated ground floors, with connections to adjacent neighborhoods and the future light-rail transit station at Pepper Canyon;

7. Provide housing for approximately 65 percent of the eligible student population by constructing new higher-density units and replacing aging low-density units while taking into account affordability, financial feasibility, physical site constraints, and campus character;

8. Develop new faculty and staff housing to provide affordable options and remain competitive with peer academic institutions in attracting top talent;

9. Expand and enhance research and training facilities and core services at UC Health in support of the region's only academic medical center;

10. Enhance multi-modal connections and continue to provide TDM programs to optimize trip reduction benefits of the light rail transit system, reduce automobile commuting, and coordinate with regional transportation programs;

11. Minimize environmental impacts through sustainable development practices related to campus planning, building siting, design, construction and operations; and

12. Recognize the importance of campus open spaces that form a balance with the built environment and continue to be responsible stewards of campus natural and biological resources.

5.1.2 PROJECT IMPACTS

The potential environmental effects from implementation of the proposed Update to the 2018 LRDP are evaluated in Chapters 3.0 and 4.0 of this SEIR. As disclosed in Sections 3.1 through 3.13, the analysis concludes that campus growth and development under the Update would result in potentially significant impacts as analyzed through the purview of subsequent review for 13 resource areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Noise
- Population and Housing
- Public Services
- Transportation and Circulation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

As disclosed in Section 4.1 of this SEIR, seven environmental topic areas were determined through the subsequent review process completed for this SEIR to have been adequately analyzed in the 2018 LRDP EIR or were not applicable. Thus, the following topics are not addressed in evaluation of the project alternatives and are not discussed further in this chapter.

- Agriculture and Forestry Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Recreation

A summary of the environmental impacts resulting from implementation of the Update to the 2018 LRDP, as disclosed in Chapters 3.0 and 4.0 of this SEIR, is provided in Table 5-1, *Summary of Update*

to the 2018 LRDP Impacts. The environmental issue areas were derived from Appendix G and Appendix F of the CEQA Guidelines.

Table 5-1
Summary of Update to the 2018 LRDP Impacts

Issue Area	Update to the 2018 LRDP Impacts	
	Without Mitigation	With Mitigation
Aesthetics		
Scenic Vistas	PS	LS
Conflict with Zoning and Other Regulations for Scenic Quality	LS	N/A
Lighting and Glare	PS	LS
Air Quality		
Consistency with Applicable Air Quality Plan	LS	N/A
Cumulatively Considerable Net Increase of Nonattainment Criteria Pollutants	PS	LS
Impacts to Sensitive Receptors	LS (CO hotspots); PS (TAC emissions)	N/A (CO hotspots); SU (TAC emissions)
Odor Emissions	PS	LS
Biological Resources		
Candidate, Sensitive, or Special-Status Plant Species	PS	LS
Candidate, Sensitive, or Special-Status Animal Species	PS	LS
Riparian Habitat and Other Sensitive Natural Communities	PS	LS
Wetlands	PS	LS
Cultural Resources		
Historical Resources (Built Environment)	PS	LS or SU
Archaeological Resources	PS	LS
Human Remains	PS	LS
Energy		
Wasteful, Inefficient, or Unnecessary Use of Energy	PS	LS
Conflict with Renewable Energy or Energy Efficiency Plan	PS	LS
Greenhouse Gas Emissions		
Generate GHG Emissions	PS	LS
Consistency with Applicable Plan	PS	LS
Noise		
Exceed Noise Standards	PS	LS
Excessive Groundborne Vibration or Noise	PS	LS
Population and Housing		
Direct Inducement of Substantial Unplanned Population Growth	PS (direct); LS (indirect)	SU (direct); N/A (indirect)
Displacement of Housing	LS	N/A
Public Services		
Fire Protection Facilities	LS	N/A
Police Protection Facilities	LS	N/A
Public School Facilities	LS (direct); PS (cumulative)	N/A (direct); SU (cumulative)
Transportation and Circulation		
Compliance with Circulation System Programs, Plans, Ordinances, or Policies	LS	N/A
Induce Substantial Vehicle Miles Traveled	LS	N/A

Issue Area	Update to the 2018 LRDP Impacts	
	Without Mitigation	With Mitigation
Tribal Cultural Resources		
Regional Loss of Tribal Cultural Resources	PS	LS (direct); SU (cumulative)
Utilities and Service Systems		
New Utilities Facilities	PS	LS
Water Supply Availability	LS	N/A
Wastewater Treatment Capacity	PS	LS
Solid Waste Generation	LS	N/A
Compliance with Solid Waste Regulations	LS	N/A
Wildfire		
Emergency Response Plan or Emergency Evacuation	PS	LS
Wildfire Pollutant Concentrations	LS	N/A
Installation or Maintenance of Associated Infrastructure	LS	N/A
Flooding or Landslides	LS	N/A

LS Less than significant impact
PS Potentially significant impact
SU Significant and unavoidable impact
N/A Not applicable (i.e., no mitigation measures proposed)

As shown in Table 5-1, the proposed Update to the 2018 LRDP would result in significant and unavoidable impacts after mitigation to the following environmental issues:

- Direct exposure of sensitive receptors to operational toxic air contaminant emissions;
- Direct alteration of historical resources which causes a substantial change in their significance;
- Cumulatively considerable loss of historical resources;
- Direct and cumulatively considerable inducement of substantial population growth;
- Cumulatively considerable impacts to public school facilities; and
- Cumulatively considerable regional loss of tribal cultural resources.

All other environmental issue areas would be less than significant with mitigation, less than significant, or not impacted with implementation of the Update to the 2018 LRDP.

5.2 ALTERNATIVES CONSIDERED BUT NOT EVALUATED IN DETAIL

During the planning of the proposed Update to the 2018 LRDP, a comment received in response to the NOP suggested an alternative of entirely new campuses to account for growth; however, this was determined to be unreasonable/infeasible and would likely result in new, potentially increased environmental impacts depending on the selected location, and rejected from further analysis (similar to the Alternative San Diego County Location for Additional Campus Growth described in Section 5.3.2 of the 2018 LRDP EIR). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives; (ii) infeasibility; and/or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).

5.2.1 INCREASED HOUSING ALTERNATIVE

This alternative would include the same amount of overall campus building space proposed with the Update to the 2018 LRDP, with the exception that it would prioritize the provision of additional beds to accommodate all new faculty and staff housing needs anticipated under the Update. By eliminating the demand for off-campus faculty and staff housing, related to the Update to the 2018 LRDP, this alternative would reduce the impacts related to direct and cumulatively considerable inducement of substantial population growth associated with the proposed Update. Housing faculty and staff on campus would likely result in a greater trip reduction and reduced VMT as faculty and staff would no longer need to commute to the campus. This alternative would include more dedicated housing development than the proposed Update to the 2018 LRDP, but it would still occur within the same development footprint. This alternative would therefore result in increased campus residential development with less available remaining GSF allocated to academic and other program-related uses on campus.

Compared to the Update to the 2018 LRDP, this alternative would better fulfill Project Objective 8 by developing new housing for a greater number of faculty and staff, but would fulfill Project Objective 9 to a lesser degree than the proposed Update to the 2018 LRDP since it would prioritize housing within the same developable areas as envisioned in the Update and result in reduced development space available for other core services. By increasing the amount of housing and beds offered, a reduction of research and other academic uses would be required. In addition, while the population growth would be the same as the proposed Update to the 2018 LRDP, the increased population would be located on campus, which would exacerbate impacts identified under the Update to the 2018 LRDP related to public services and utilities and service systems. This alternative would include increasing the demand for schools in the immediate vicinity of the campus, since more school-aged children would reside on campus within faculty and staff housing instead of residing throughout the County. Also, the addition of faculty, staff, and their children living on campus could result in a more intensive demand on fire and police protection, utilities, and service systems compared to the proposed Update to the 2018 LRDP. The impact to wastewater systems identified with implementation of the Update could be further exacerbated with the increased resident population, which may require additional upsizing of campus sewer mains and City mains downstream of the campus. For this reason, this alternative may conflict with Project Objective 11, which aims to minimize environmental impacts related to campus planning, building siting, design, and construction and operations. Thus, this alternative would not avoid (and may worsen) significant impacts associated with the Update to the 2018 LRDP and was rejected from further analysis.

5.3 ALTERNATIVES EVALUATED IN THIS SEIR

This section presents an evaluation of two alternatives to the proposed Update to the 2018 LRDP: (1) the No Project Alternative (2018 LRDP) and (2) Reduced Project Alternative. For both alternatives, a brief description is first presented, followed by a summary impact analysis relative to the impacts of the proposed Update to the 2018 LRDP analyzed in Chapter 3.0 of this SEIR, and an assessment of the degree to which the alternative would meet the objectives of the proposed Update to the 2018 LRDP. Table 5-2, *Comparison of Alternatives*, provides a comparison of these alternatives with the Update to the 2018 LRDP.

The No Project Alternative (2018 LRDP) was selected for analysis in this section pursuant to Section 15126.6(e) of the CEQA Guidelines. This alternative provides an example of an alternative

that is the continuation of an existing plan, policy, or operation into the future, where projects initiated under the existing plan continue while the new plan is developed. The Reduced Project Alternative focuses on the reduction of development on campus related to housing, which would then help reduce development density-related impacts.

5.3.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE (2018 LRDP)

The No Project Alternative assumes the adopted 2018 LRDP would remain as the applicable planning document for UC San Diego, with the land use plan and anticipated development to remain the same as disclosed in that document. Development planned in the 2018 LRDP would continue to occur (after undergoing CEQA review including tiering off the 2018 LRDP EIR, if appropriate, and Regents' approval). Total campus population would increase marginally but would be limited since the campus is approaching the maximum total campus population levels anticipated in the 2018 LRDP (65,050 as of fall 2023 with a total of 65,600 projected).

Planned development under the No Project Alternative (2018 LRDP) would proceed according to what is allowable under the 2018 LRDP. Specifically, the No Project Alternative (2018 LRDP) would cap campus development at approximately 27.9 million GSF, allowing for approximately 1.1 million GSF of ongoing development to occur in the near term as approved under the 2018 LRDP. Compared to the total projected GSF of approximately 36.2 million proposed with the Update to the 2018 LRDP, the No Project Alternative would provide approximately 23 percent less total GSF at full buildout (see Table 2-4 in Chapter 2 of this SEIR).

The increase in total campus population, including student enrollment, would not exceed what is contemplated in the 2018 LRDP. However, because the development footprint is generally the same, the density of the development planned by the No Project Alternative (2018 LRDP) would be reduced compared to what is being proposed for the Update to the 2018 LRDP.

5.3.2 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE

The Reduced Project Alternative would increase development compared to the 2018 LRDP, but at a reduced scale compared to the Update to the 2018 LRDP. Under this alternative, the campus would plan for a net increase of approximately 5.75 million GSF of development (instead of 8.3 million GSF), for a total of approximately 33.55 million GSF (compared to the approximately 36.2 million GSF total proposed with the Update to the 2018 LRDP), thus providing approximately 7 percent less total GSF and approximately 30 percent less of a net increase than the proposed Update to the 2018 LRDP at buildout.

In addition, the Reduced Project Alternative will not include the six historical resources that were identified as having the potential to be demolished (See Section 3.4.3, Issue 1, of this SEIR). The six resources include the Medical Teaching Facility, Main Gym and Natatorium, Rec Gym, Sumner Auditorium, Camp Matthews Sentry Booth, and University Center Building 409.

Under this alternative, student enrollment and staff population growth could remain the same as the Update to the 2018 LRDP; however, when the 5.75 million net increase in GSF development limit is reached, no further development of housing, academic, or other planned uses would occur. Additional students, faculty, and staff would reside off campus and commute from other areas in the region rather than living on campus. In addition, future academic and non-academic programs

that would have utilized the additional space would instead be located within existing facilities, as feasible.

Table 5-2
Comparison of Alternatives

	Total Projected Development	Net Development Increase Compared to 2018 LRDP	Total Campus Population	Net Campus Population Increase Compared to 2018 LRDP
Alternative 1: No Project (2018 LRDP)	27.9 million GSF	--	65,600	--
Alternative 2: Reduced Project	33.5 million GSF	5.75 million GSF	96,300	30,700
Proposed Project: Update to the 2018 LRDP	36.2 million GSF	8.3 million GSF	96,300	30,700

Note: Campus population represents students, staff, and faculty.

5.4 ALTERNATIVE IMPACT ANALYSIS

5.4.1 NO PROJECT ALTERNATIVE (2018 LRDP) ANALYSIS

The following analysis is summarized from the 2018 LRDP EIR, which is incorporated by reference herein, with adjustments, as specified, to account for the growth and development anticipated under the 2018 LRDP that has been implemented. Note that the No Project Alternative (2018 LRDP) would not involve approval of a new LRDP document or any of the new or revised mitigation measures proposed with the Update to the 2018 LRDP. Therefore, mitigation measures referenced in relation to the No Project Alternative (2018 LRDP) are those from the 2018 LRDP EIR.

5.4.1.1 ENVIRONMENTAL ANALYSIS

Aesthetics

Scenic Vistas. Mitigation measures included implementation of design requirements and site-specific visual analyses for projects in a Visual Sensitive Zone or KVP (Aes-1). Since the No Project Alternative (2018 LRDP) proposes less development compared to the Update to the 2018 LRDP, aesthetics impacts would be incrementally reduced as the overall campus development would be less dense and have a lower potential of impeding views. The mitigation measure to address these impacts (Aes-1) would still apply. Overall, impacts would be similar to those of the proposed Update to the 2018 LRDP.

Conflict with Zoning and Other Regulations for Scenic Quality. The 2018 LRDP required projects within SIO and the PDZ to undergo review by the DRB, Campus Architect, and other relevant campus committees to ensure that they incorporate design features along the facades of structures facing the public realm (Aes-2A and Aes-2B). Subsequent to the preparation of the 2018 LRDP EIR, updates to the CEQA Guidelines, campus policies, and other regulatory updates (such as SB 743) have altered the nature of how visual impacts are analyzed. Per SB 743, aesthetic impacts are no longer required within an urbanized area provided that projects do not conflict with applicable regulations. Further, updated Design Guidelines require that plans are reviewed by the DRB,

Campus Architect, and Campus Planning. Therefore, while mitigation measures Aes-2A and Aes-2B are no longer necessary, the No Project Alternative (2018 LRDP) would continue to require them for campus development projects as they are proposed. Overall, impacts would be similar to those of the proposed Update to the 2018 LRDP.

Lighting and Glare. Glare reduction measures were required for projects that introduce new parking areas, structures and roads. Since the No Project Alternative (2018 LRDP) proposes less development compared to the Update to the 2018 LRDP, lighting and glare impacts would be incrementally reduced as the overall campus development would have a lower potential of introducing new light sources. Mitigation measures to address these impacts (Aes-3, and Bio-3J) would still apply, though the new measure Bio-2H, would not be required since it was not included in the 2018 LRDP EIR. Overall, impacts would be similar to those of the proposed Update to the 2018 LRDP.

Air Quality

Consistency with Applicable Air Quality Plan. Similar to the proposed Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would not conflict with or obstruct implementation of the applicable air quality plan, as it would be consistent with the Smart Growth vision for the region in the SANDAG Regional Plan and would result in reduced VMT compared to the regional average. Impacts to implementation of applicable air quality plans would be less than significant without mitigation under both the No Project Alternative (2018 LRDP) and the Update to the 2018 LRDP.

Cumulatively Considerable Net Increase of Nonattainment Criteria Pollutants. The 2018 LRDP EIR analysis concluded that because implementation of the 2018 LRDP would exceed the project-level air quality significance thresholds for PM_{10} and NO_X emissions, construction and operational emissions associated with the 2018 LRDP would be cumulatively considerable. The Update to the 2018 LRDP was determined to not result in a cumulatively considerable net increase in criteria air pollutant emissions for which the region is in non-attainment under applicable air quality standards. Therefore, the No Project Alternative (2018 LRDP) would have a greater level of impact compared to the Update to the 2018 LRDP.

Impacts to Sensitive Receptors. Impacts related to exposure of sensitive receptors to substantial pollutant concentrations resulting in a CO hotspot would be less than significant without mitigation under both the No Project Alternative (2018 LRDP) and the Update to the 2018 LRDP. Health risks from the impact of TAC emissions for construction activities and their effects on nearby receptors, and the exposure to TACs for receptors from mobile sources and on-campus stationary sources, such as emergency generators, boilers, turbines, and the crematory, would be significant and unavoidable for both the No Project Alternative (2018 LRDP) and the Update to the 2018 LRDP.

Odors. Impacts associated with odors were considered less than significant under the 2018 LRDP. This is a reduced impact compared to the Update to the 2018 LRDP, which may require mitigation to reduce odors associated with a potential wastewater treatment plant.

Biological Resources

Candidate, Sensitive, or Special-Status Plant Species. Under the No Project Alternative (2018 LRDP), development within the campus would occur as allowed under the 2018 LRDP. The No Project Alternative (2018 LRDP) includes developable areas that are similar to the proposed Update to the 2018 LRDP, with a focus on redevelopment of existing developed lands to reduce or avoid potential

impacts to candidate, sensitive, or special-status plant species. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Candidate, Sensitive, or Special-Status Animal Species. The No Project Alternative (2018 LRDP) focuses on redevelopment of existing developed lands to reduce or avoid potential impacts to candidate, sensitive, or special-status animal species. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Riparian Habitat and Other Sensitive Natural Communities. The No Project Alternative (2018 LRDP) focuses on redevelopment of existing developed lands to reduce or avoid potential impacts to riparian habitat and other sensitive natural communities identified in local or regional plans, policies, regulations or by CDFW or USFWS. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Wetlands. The No Project Alternative (2018 LRDP) focuses on redevelopment of existing developed lands to reduce or avoid potential impacts to wetlands defined by Section 404 of the CWA. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Cultural Resources

Historical Resources (Built Environment). Under the No Project Alternative (2018 LRDP), development within the campus would occur as allowed under the 2018 LRDP, which would be reduced compared to the Update to the 2018 LRDP. Similar to the proposed Update to the 2018 LRDP, implementation of the No Project Alternative (2018 LRDP) has the potential to impact historical (built environment) resources within the campus through renovation, modification, redevelopment, or demolition of existing historic resources, or new development adjacent to historical resources. However, the five new resources identified for demolition in the Update would not be adversely affected. Given that neither the No Project Alternative (2018 LRDP) nor the proposed Update to the 2018 LRDP evaluates specific projects, potential impacts may be less than significant with mitigation or significant and unavoidable, depending on the type of historic resource and extent of the impacts. Mitigation measures identified as part of the 2018 LRDP EIR would be applied to projects involving potential substantial adverse impacts to historical resources. While the No Project Alternative (2018 LRDP) would result in a reduced potential for historic resources to be impacted, for both scenarios the implementation of mitigation measures may not reduce significant impacts to below a level of significance. Therefore, for the No Project Alternative (2018 LRDP) and the proposed Update to the 2018 LRDP, impacts would remain either less than less than significant with mitigation or significant and unavoidable, depending on the type of historic resource and extent of the impacts.

Archaeological Resources. The developable area identified in the No Project Alternative (2018 LRDP) is roughly the same as that in the proposed Update to the 2018 LRDP, with the exception of the two Open Space Preserve areas shown in Figure 2-4 that have been identified for potential utilities improvements under the Update. These areas would remain as Open Space Preserve under the No Project Alternative (2018 LRDP). As with the proposed Update to the 2018 LRDP, existing known and potentially unknown cultural resources within the campus have the potential to be impacted by implementation of the No Project Alternative (2018 LRDP); therefore, development under the No Project Alternative (2018 LRDP) has the potential to result in significant impacts resulting from a substantial adverse change in the significance of archaeological resources. As with the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would mitigate potential impacts to archaeological resources to a less than significant level.

Human Remains. Similar to the discussion of archaeological resources above, both the Update to the 2018 LRDP and No Project Alternative (2018 LRDP) have the potential to disturb human remains during construction requiring ground disturbance. As with the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would mitigate potential impacts to human remains to a less than significant level.

Energy

Wasteful, Inefficient, or Unnecessary Use of Energy. Energy used for construction and operation of the No Project Alternative (2018 LRDP) would be reduced compared to the Update to the 2018 LRDP, as the overall development would be reduced. Development under the No Project Alternative (2018 LRDP) would be implemented in compliance with applicable construction equipment idling regulations and state and UC San Diego programs increasing building energy efficiency; result in below-average vehicle miles traveled; and use of renewable energy resources. No mitigation measures applied to the No Project Alternative (2018 LRDP) because the 2018 LRDP included a GHG Reduction Action to decarbonize the campus cogeneration plant to 40 percent biogas by 2023. However, this has been superseded by the Decarbonization Plan and the Action was removed as part of the Update. Compared to the significant but mitigable impact of the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in a reduced impact related to wasteful, inefficient, or unnecessary use of energy.

Conflict with Renewable Energy or Energy Efficiency Plan. Both the No Project Alternative (2018 LRDP) and Update to the 2018 LRDP would be required to comply with the UC Sustainable Practices Policy. As noted above, the 2018 LRDP included a GHG Reduction Action to decarbonize the campus cogeneration plant to 40 percent biogas by 2023. However, this has been superseded by the Decarbonization Plan. Compared to the significant but mitigable impact of the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in a reduced impact related to conflicts with renewable energy or energy efficient plans.

GHG Emissions

Generate GHG Emissions. Under the No Project Alternative (2018 LRDP EIR), potentially significant impacts were identified, due to the exceedance of efficiency metrics developed for consistency with California's GHG emission reduction goals. Three mitigation measures were prescribed to reduce emissions associated with the 2035 Scenario at buildout of the No Project Alternative (2018 LRDP): GHG-1A required the decarbonization of the cogeneration plant after 2032; GHG-1B required the installation of electric vehicle chargers; and GHG-1C required UC San Diego to prepare annual inventory updates and purchase carbon credits to achieve a campus-wide emission rate of no more than 2.36 MT CO_2e/capita.

As noted above, the 2018 LRDP included a GHG Reduction Action to decarbonize the campus cogeneration plant to 40 percent biogas by 2023. This Action has been superseded by the 2024 Decarbonization Plan and it was removed as part of the Update. Mitigation measures GHG-1A and GHG-1B have been updated as part of the Update to the 2018 LRDP to provide clarification that the decarbonization will apply to the entire Central Utilities Plant and to update timing requirements of these measures in alignment with buildout of the Update to the 2018 LRDP. Mitigation measure GHG-1C has been removed as part of the Update because the component that allows the purchase of carbon credits to achieve the campus-wide emissions target no longer applies for purposes of reduction targets set forth in the current UC Sustainable Practices Policy. In addition, the

component of measure GHG-1C requiring annual inventory updates is also part of the UC Sustainable Practices Policy and updated UC San Diego CAP.

As analyzed in the 2018 LRDP EIR, the No Project Alternative (2018 LRDP) would result in GHG emission impacts that would be less than significant with mitigation, consistent with the conclusion for the proposed Update to the 2018 LRDP. However, given the change in UC Sustainable Practices Policy regarding the use of credits to achieve applicable GHG emissions targets, projects constructed under the No Project Alternative (2018 LRDP) would not be able to use carbon credits to achieve applicable GHG emission targets.

Consistency with Applicable Plan. Both the No Project Alternative (2018 LRDP) and Update to the 2018 LRDP would be required to comply with the UC Sustainable Practices Policy. The 2018 LRDP EIR identified a less than significant impact related to energy plans. As noted above, the 2018 LRDP included a GHG Reduction Action to decarbonize the campus cogeneration plant to 40 percent biogas by 2023. However, this has been superseded by the Decarbonization Plan. Compared to the significant but mitigable impact of the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in a reduced impact related to conflicts with renewable energy or energy efficient plans. Further, projects constructed under the No Project Alternative (2018 LRDP) would not be able to use carbon credits to achieve applicable GHG emission targets.

Noise

Exceed Noise Standards. The No Project Alternative (2018 LRDP) would result in potentially significant impacts related to noise as the development types and developable area would be roughly the same as the Update to the 2018 LRDP, although the overall development would be reduced. The No Project Alternative (2018 LRDP) would continue to increase existing traffic volumes on campus roadways, establish new noise-sensitive land uses, and construct buildings that would feature stationary noise sources, all of which could expose NSLUs to noise levels in excess of standards and result in a similar potentially significant impact to the Update to the 2018 LRDP. In addition, compared to the proposed Update to the 2018 LRDP, this alternative would result in similar potentially significant impacts prior to mitigation related to substantial temporary increases in ambient noise levels from construction in the project vicinity. While mitigation measures Noi-1A and Noi-1B are no longer necessary, the No Project Alternative (2018 LRDP) would continue to require them for campus development projects as they are proposed. As with the proposed Update to the 2018 LRDP, impacts associated with the No Project Alternative (2018 LRDP) related to noise would be mitigated to a less than significant level.

Excessive Groundborne Vibration or Noise. Compared to the proposed Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in similar impacts related to vibration generation as the construction activities required to implement the No Project Alternative (2018 LRDP) would be similar, despite the decrease in total development. Construction vibration impacts would be mitigated below a level of significance for both the No Project Alternative (2018 LRDP) and Update to the 2018 LRDP. While mitigation measure Noi-2A for exposure to vibration is no longer required, it would continue to apply to development with the No Project Alternative (2018 LRDP). Overall, the vibration impacts for the proposed Update to the 2018 LRDP and No Project Alternative (2018 LRDP) would be similar and would be mitigated to a less than significant level.

Population and Housing

Direct Inducement of Substantial Unplanned Population Growth. The 2019 LRDP EIR concluded that the population increase resulting from the proposed 2018 LRDP was substantial; therefore, direct impacts relating to substantial inducement of population growth in the area were identified as significant and unavoidable. As of 2025, over half of the planned development under the 2018 LRDP has occurred, and the total campus population has nearly reached 65,600, which was the campus population planned by 2035 under the 2018 LRDP. Thus, under the No Project Alternative (2018 LRDP), the remaining population growth would not be substantial, nor would it create a substantial demand for off-campus housing.

Under the proposed Update to the 2018 LRDP, the total student population is projected to increase from 42,400 students under buildout of the 2018 LRDP by 2035, to 56,000 students under buildout of the Update by 2040. The staff and faculty population are projected to increase from 23,200 under the 2018 LRDP to 40,300 under the Update to the 2018 LRDP, for a total campus population of 96,300 by 2040. While some of the students, staff, and faculty would be from the San Diego region, a large portion of them would be from outside the region, thus resulting in direct inducement of substantial population growth to the region. In addition, while the proposed Update to the 2018 LRDP would provide housing for new students, it would not be able to provide housing for all new faculty and staff, thus creating a demand for additional off-campus housing and resulting in a growth-inducing impact.

The impact associated with direct inducement of substantial unplanned population growth in the area from the No Project Alternative (2018 LRDP) would remain significant and unavoidable, similar to the proposed Update to the 2018 LRDP. Neither the 2018 LRDP nor the Update to the 2018 LRDP were found to have an indirect impact associated with inducement of substantial population growth in the area.

Displacement of Housing. Under the No Project Alternative (2018 LRDP), existing campus housing could at times be displaced temporarily as a result of redevelopment or renovations of UC San Diego housing facilities; however, it is likely that redevelopment and/or renovations would be timed to occur or begin over the summer months, when student and employee populations would be temporarily reduced. Furthermore, consistent with existing practice, UC San Diego would monitor the on-campus population and stagger opening of new housing facilities as development occurs within the campus to maximize the amount of on-campus housing and reduce the probability of a single-year decrease in housing. This practice would continue to apply under the Update to the 2018 LRDP.

The No Project Alternative (2018 LRDP) and the Update to the 2018 LRDP would have less than significant impacts related to the displacement of substantial numbers of existing people or housing that necessitates construction of replacement housing.

Public Services

Fire Protection Facilities. Compared to the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in similar but less intensive impacts related to fire protection services. While the developable area identified in the 2018 LRDP is roughly the same as that in the Update to the 2018 LRDP, population estimates would increase from approximately 65,600 by 2035 for the No Project Alternative (2018 LRDP) to 96,300 by 2040 for the Update to the 2018 LRDP. Similar to the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would not result in

substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, and impacts would be less than significant.

Police Protection Facilities. Compared to the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in similar but less intensive impacts with regard to police protection services. While the developable area identified in the 2018 LRDP is roughly the same as that in the proposed Update to the 2018 LRDP, population estimates would increase from approximately 65,600 by 2035 for the No Project Alternative (2018 LRDP) to 96,300 by 2040 for the Update to the 2018 LRDP. Similar to the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, and impacts would be less than significant.

Public Schools Facilities. Relative to schools, the 2018 LRDP EIR concluded that existing and planned facilities would be able to accommodate school-aged students expected to be generated by growth under the 2018 LRDP through redistricting. Direct and cumulative impacts were determined to be less than significant. Under the Update to the 2018 LRDP, direct impacts to public schools remain less than significant, while cumulative impacts were determined to have a cumulatively considerable impact, even with the incorporation of mitigation measure PS-1. Therefore, the No Project Alternative (2018 LRDP) would have a reduced impact compared to the Update to the 2018 LRDP.

Transportation and Circulation

Compliance with Circulation System Programs, Plans, Ordinances, or Policies. Under the No Project Alternative (2018 LRDP), thresholds included in 2018 LRDP EIR would still apply. The 2018 LRDP EIR assessed impacts related to conflicts with roadway policies using LOS as a significance threshold and concluded that impacts were significant. Mitigation measure Tra-1A-OPT2 was identified in the 2018 LRDP EIR to address potential LOS impacts to the roadway system. Implementation of mitigation measure Tra-1A-OPT2, including installation of adaptive traffic signal controls ("smart signals") and pedestrian and bicycle crossing safety improvements at key roadway corridors surrounding the campus (La Jolla Village Drive, Regents Road and later expanded to include North Torrey Pines Road), would reduce impacts to the roadway system but the impact would remain significant and unavoidable.

The Update to the 2018 LRDP is being analyzed per the current CEQA Guidelines, which no longer use LOS as a metric for determining significance. Additionally, the Update would further implement the smart growth and sustainable development approaches and is consistent with the 2021 Regional Plan. Therefore, the Update to the 2018 LRDP is would not conflict with applicable programs, plans, ordinances, or policies addressing transit, roadway, bicycle, or pedestrian facilities.

While the No Project Alternative (2018 LRDP) resulted in significant and unavoidable impacts, the Update to the 2018 LRDP reduces impacts to a less than significant level.

Induce Substantial Vehicle Miles Traveled. Consistent with the conclusion of the 2018 LRDP EIR, implementation of the No Project Alternative (2018 LRDP) would result in less than significant impacts related to VMT, similar to the Update to the 2018 LRDP.

Tribal Cultural Resources

Regional Loss of Tribal Cultural Resources. Under the No Project Alternative (2018 LRDP), construction could result in the disturbance of tribal cultural resources due to the known existence of sensitive resources in the vicinity of UC San Diego. Mitigation measures Cul-5A (Avoidance and Preservation), Cul-5B (Monitoring), and Cul-5C (Repatriation) would apply to address potentially significant impacts to cultural resources. These measures were determined to reduce direct impacts to a less than significant level; however, cumulative impacts would be considered significant and unavoidable.

Under the Update to the 2018 LRDP, mitigation measures were consolidated, and clarifications were added, such as the requirement for a Native American monitor during construction. Further, the requirement for implementation of a Cultural Resources Monitoring, Discovery, and Treatment Plan as part of the updated measure Cul-2E. As a result, mitigation measures Cul-5A through Cul-5C were removed. However, while these measures reduce the direct impact, cumulative impacts remain significant and unavoidable.

Under the No Project Alternative (2018 LRDP), mitigation measures identified in the 2018 LRDP EIR would remain applicable to development. Thus, similar to the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in a less than significant project-level impact with mitigation and a significant and unavoidable cumulative impact to tribal cultural resources.

Utilities and Service Systems

New Utilities Facilities. Compared to the proposed Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in reduced development and campus population, resulting in less demand for water, less wastewater generation, and less energy and telecommunications demand. Therefore, overall demand for utilities and service systems would be less when compared to the Update to the 2018 LRDP. Similar to the proposed Update to the 2018 LRDP, impacts due to construction of new or relocated potable water, storm water, energy, and telecommunications infrastructure would be less than significant.

The No Project Alternative (2018 LRDP) also would have a less than significant impact related to wastewater conveyance, compared to the need to upsize City-maintained sewer lines to accommodate increased development under the Update to the 2018 LRDP. Therefore, impacts associated with wastewater capacity and sewer systems would be reduced compared to the Update to the 2018 LRDP, which would require mitigation to reduce impacts to a less than significant level.

Water Supply Availability. Compared to the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in reduced demand for water supply. Sufficient water supplies from existing entitlements and resources would be available to serve anticipated growth, which was accounted for in regional water resource planning documents of the City, San Diego County Water Authority, and the Metropolitan Water District of Southern California. Impacts would be less than significant, similar to the Update to the 2018 LRDP.

Wastewater Treatment Capacity. The No Project Alternative (2018 LRDP) would not result in increased wastewater flows that would cause exceedance of regional treatment capacity. As the demand for wastewater treatment would be reduced compared to the Update to the 2018 LRDP and no new or upsized facilities would be required. The overall impact for the No Project

Alternative (2018 LRDP) would be less than significant, a reduced impact compared to the Update to the 2018 LRDP which requires mitigation to reduce impacts to a less than significant level.

Solid Waste Generation. Compared to the Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would result in reduced solid waste generation. Due to UC San Diego's commitment to reduce solid waste generation and increase diversion rates, the 2018 LRDP EIR concluded that the 2018 LRDP would not result in inadequate capacity of solid waste facilities. Therefore, the impact related to solid waste generation for the No Project Alternative (2018 LRDP) would be less than significant, similar to the Update to the 2018 LRDP.

Compliance with Solid Waste Regulations. The No Project Alternative (2018 LRDP) would comply with federal, state, and local management and reduction statutes and regulations to solid waste as development would comply with the UC Sustainable Practices Policy, Zero Waste Plan, and other requirements related to solid waste. The impact would be less than significant, similar to the Update to the 2018 LRDP.

Wildfire

Emergency Response Plan or Emergency Evacuation. Under the No Project Alternative (2018 LRDP), there would be a reduced development density and campus population compared to the Update to the 2018 LRDP. However, implementation of the No Project Alternative (2018 LRDP) could interfere with emergency response and evacuation on campus through construction-related road closures and mitigation measure Haz-6A was identified in the 2018 LRDP EIR to reduce those impacts to less than significant. Individual projects implemented under the Update to the 2018 LRDP would be subject to updated building construction standards, access improvements, and other design measures to ensure adequate access for emergency services and evacuation of occupants. A new measure, WF-1, was included to address potential impacts to emergency evacuation and response planning from implementation of future infill development.

Therefore, impacts related to emergency response plans and emergency evacuations would be less than significant with mitigation for both the No Project Alternative (2018 LRDP) and the Update to the 2018 LRDP. New mitigation measures for the Update to the 2018 LRDP would not apply to the No Project Alternative (2018 LRDP).

Wildfire Pollutant Concentrations. While pollutant concentrations were not expressly analyzed as impacts in the 2018 LRDP EIR, and while it is not anticipated that the development proposed under the Update to the 2018 LRDP would directly exacerbate risks of wildfire, flooding, or landslides, the No Project Alternative (2018 LRDP) proposes lower campus population than the proposed Update to the 2018 LRDP, and would therefore expose less individuals to wildfire pollutant concentrations in the event such wildfires occur. Campus-wide fire prevention and implementation of services such as plan review and construction inspections in accordance with current California building and fire codes would be implemented to reduce impacts related to wildland fires, and impacts related to wildfire risks and pollutant concentrations would be less than significant, similar to the Update to the 2018 LRDP.

Installation or Maintenance of Associated Infrastructure. Development under the No Build Alternative (2018 LRDP), similar to the proposed Update to the 2018 LRDP, would comply with all applicable regulations to mitigate fire risk, including the CBC and CFC and campus specific standards related to road access, defensible space, and utility infrastructure, resulting in less than significant impacts related to increased wildfire risk associated with installation and maintenance

of infrastructure. Impacts related to installation or maintenance of wildfire risk mitigation infrastructure would be similar under both the No Project Alternative (2018 LRDP) and the proposed Update to the 2018 LRDP and would be less than significant.

Flooding or Landslides. While landslide and flooding risks were not expressly analyzed as impacts in the 2018 LRDP EIR, and while it is not anticipated that the development proposed under the Update to the 2018 LRDP would exacerbate risks of flooding, or landslides, the No Project Alternative (2018 LRDP) proposes lower campus population than the proposed Update to the 2018 LRDP, and would therefore expose less individuals to risks in the event such flooding or landslides occur. Impacts would be less than significant, similar to the Update to the 2018 LRDP.

5.4.1.2 ABILITY TO ACCOMPLISH PROJECT OBJECTIVES (NO PROJECT ALTERNATIVE [2018 LRDP])

The No Project Alternative (2018 LRDP) would accomplish four fundamental objectives identified for the proposed Update to the 2018 LRDP, including: locating campus buildings in accordance with the character, scale, and design goals expressed in guiding principles included in campus guidance documents (**Objective 3**); completing the redevelopment of the University Center on West Campus as a walkable "town center" (**Objective 6**); implementing sustainable development practices related to campus planning, design, construction, and operations (**Objective 11**); and recognizing the importance of campus open spaces that form a balance with the built environment and continue to be responsible stewards of campus natural and biological resources (**Objective 12**).

The No Project Alternative (2018 LRDP) would fulfill five other objectives, but to a lesser extent than the Update to the 2018 LRDP. For example, it would not be able to fully provide undergraduate students with personalized academic services and close-knit intellectual and social environment outside of their academic department (**Objective 2**), since it would result in fewer facilities available to support the undergraduate students anticipated to enroll at UC San Diego in the future. Because growth would be curtailed, some co-location and expansion of campus programs and services that would have been implemented under the proposed Update to the 2018 LRDP may be limited or reprioritized to maximize the campus's ability to respond to California's higher education needs. Therefore, co-location of campus programs, facilities, and activities, to create synergy between shared resources and services (**Objective 4**); activating and enlivening the campus through additional on-campus housing to facilitate a living-learning campus environment (**Objective 5**); developing new faculty and staff housing to provide affordable options (**Objective 8**); and expanding multi-modal connections and TDM programs to optimize trip reduction benefits of the light rail transit system, reduce automobile commuting (**Objective 10**) would only be partially fulfilled.

The No Project Alternative (2018 LRDP) would not fulfill three of the stated objectives. The No Project Alternative (2018 LRDP) would only accommodate development up to the previously projected 8.9 million GSF of new facilities, and thus would accommodate projected growth by providing approximately 13 million GSF of new facilities needed to expand academic and non-academic programs (**Objective 1**). The No Project Alternative (2018 LRDP) would not provide housing for approximately 65 percent of the eligible student population by constructing new higher-density units and replacing aging low-density units while taking into account affordability, financial feasibility, physical site constraints, and campus character (**Objective 7**). It would also not fulfill the objective related to expansion and enhancement of research and training facilities and core services at UC Health (**Objective 9**) as no such development was proposed under the No Project Alternative (2018 LRDP).

In summary, out of the 12 stated objectives, the No Project Alternative (2018 LRDP) would be able to fulfill four objectives, partially fulfill five objectives, and not fulfill three objectives.

5.4.2 REDUCED PROJECT ALTERNATIVE ANALYSIS

Note that within the impact analysis below, where mitigation measures are identified for Reduced Project Alternative, it is assumed that they would be updated as indicated for the proposed Update to the 2018 LRDP.

5.4.2.1 ENVIRONMENTAL ANALYSIS

Aesthetics

Scenic Vistas. Since the Reduced Project Alternative proposes less development compared to the Update to the 2018 LRDP, aesthetics impacts would be incrementally reduced as the overall campus development would be less dense and have a lower potential of impeding views. However, the mitigation measure to address these impacts (Aes-1) would likely still apply. Overall, impacts would be similar to the proposed Update to the 2018 LRDP.

Conflict with Zoning and Other Regulations for Scenic Quality. As described in Section 3.1.3.2, per SB 743, aesthetic impacts are no longer required within an urbanized area provided that projects do not conflict with applicable regulations. Similar to the proposed Update to the 2018 LRDP, the Reduced Project Alternative proposes development that would be within a TPA for which aesthetics impacts would be less than significant, similar to the Update to the 2018 LRDP.

Lighting and Glare. Since the Reduced Project Alternative proposes less development compared to the Update to the 2018 LRDP, lighting and glare impacts would be incrementally reduced as the overall campus development would have a lower potential of introducing new light sources. Mitigation measures to address these impacts (Aes-3, and Bio-3J) as well as the new mitigation measure Bio-2H. Overall, impacts would be similar to those of the proposed Update to the 2018 LRDP.

Air Quality

Consistency with Applicable Air Quality Plan. Similar to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would not conflict with or obstruct implementation of the applicable air quality plan, as it would be consistent with the Smart Growth vision for the region in the SANDAG Regional Plan and would result in reduced VMT compared to the regional average. Impacts to implementation of applicable air quality plans would be less than significant without mitigation under both the Reduced Project Alternative and the Update to the 2018 LRDP.

Cumulatively Considerable Net Increase of Nonattainment Criteria Pollutants. Compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in reduced area, stationary, and vehicular sources of operational air emissions and a net decrease in construction-related and operational air emissions due to the reduction in overall development; however, emissions are likely to remain above significance thresholds. With implementation of mitigation measures AQ-2B (as updated to require the use of Tier 4 Final emissions compliant construction equipment to reduce potentially significant NO_X emissions), AQ-2C (to reduce operational VOC and CO emissions), and AQ-2D (to reduce emissions associated with backup emergency generators),

construction-related and operational criteria pollutant emissions would be less than significant, similar to the Update to the 2018 LRDP.

Impacts to Sensitive Receptors. Impacts related to exposure of sensitive receptors to substantial pollutant concentrations resulting in a CO hotspot would be less than significant without mitigation under both the Reduced Project Alternative and the Update to the 2018 LRDP. Health risks from the impact of TAC emissions for construction activities and their effects on nearby receptors, and the exposure to TACs for receptors from mobile sources and on-campus stationary sources, such as emergency generators, boilers, turbines, and the crematory, would likely be significant because these sources would remain operational under the Reduced Project Alternative. Impacts would be significant and unavoidable, similar to the Update to the 2018 LRDP.

Odors. While the Reduced Project Alternative would reduce the wastewater flows compared to the Update to the 2018 LRDP, a downstream wastewater capacity study would still be required to assess downstream effects to the City's sewer system. As part of that assessment (required by mitigation measure Util-1), a wastewater treatment plant may still be necessary. Therefore, impacts related to odors would remain potentially significant and require mitigation to reduce to a less than significant level, similar to the Update to the 2018 LRDP.

Biological Resources

Candidate, Sensitive, or Special-Status Plant Species. The Reduced Project Alternative would result in similar but less intensive impacts to biological resources compared to the proposed Update to the 2018 LRDP. Development under the Reduced Project Alternative would generally occur within the same development footprint as the proposed Update to the 2018 LRDP, except it would avoid potential impacts to the Open Space Preserve areas shown in Figure 2-4 that have been identified for potential utilities improvements under the Update. Similar to the proposed Update, development under this Alternative would focus on redevelopment of existing developed lands to reduce or avoid potential impacts to candidate, sensitive, or special-status plant species. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Candidate, Sensitive, or Special-Status Animal Species. The Reduced Project Alternative focuses on redevelopment of existing developed lands to reduce or avoid potential impacts to candidate, sensitive, or special-status animal species. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Riparian Habitat and Other Sensitive Natural Communities. The Reduced Project Alternative focuses on redevelopment of existing developed lands to reduce or avoid potential impacts to riparian habitat and other sensitive natural communities including potential ESHA identified in local or regional plans, policies, regulations or by the CDFW or USFWS. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Wetlands. The Reduced Project Alternative focuses on redevelopment of existing developed lands to reduce or avoid potential impacts to wetlands defined by Section 404 of the CWA. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Cultural Resources

Historical Resources (Built Environment). Development under the Reduced Project Alternative would generally occur within the same development footprint as the proposed Update to the 2018

LRDP, although at a reduced scale commensurate with the 30 percent reduction in the net increase in development compared to the Update. However, the six new resources identified for demolition in the Update would not be adversely affected. Similar to the proposed Update to the 2018 LRDP, implementation of the Reduced Project Alternative has the potential to impact historical (built environment) resources within the campus through renovation, modification, demolition, or redevelopment of existing historic resources, or new development adjacent to historical resources. While the Reduced Alternative would result in a reduced potential for historic resources to be impacted, for both scenarios the implementation of mitigation measures may not reduce significant impacts to below a level of significance. Therefore, for the Reduced Project Alternative and the proposed Update to the 2018 LRDP, impacts would remain either less than less than significant with mitigation or significant and unavoidable, depending on the type of historic resource and extent of the impacts and mitigation measures Cul-1A through Cul-1G would be required.

Archaeological Resources. As noted above, the development footprint of the Reduced Project Alternative would be the same as the Update to the 2018 LRDP except for avoiding the Open Space Preserve area identified for the potential wastewater treatment plant that may be required as part of mitigation measure Util-3. However, no known cultural resources occur in the Open Space Preserve area would be avoided by this alternative; therefore, no change in the potential impact would occur. Consistent with the proposed Update to the 2018 LRDP, existing known and potentially unknown cultural (archaeological) resources within the campus have the potential to be impacted by implementation of the Reduced Project Alternative. As with the Update to the 2018 LRDP, the Reduced Project Alternative would mitigate potential impacts to archaeological resources to a less than significant level by implementing mitigation measures Cul-2A through Cul-2E.

Human Remains. Similar to the discussion of archaeological resources above, both the Update to the 2018 LRDP and Reduced Project Alternative have the potential to disturb human remains during construction requiring ground disturbance. As with the Update to the 2018 LRDP, the Reduced Project Alternative would mitigate potential impacts to human remains to a less than significant level.

Energy

Wasteful, Inefficient, or Unnecessary Use of Energy. Compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar less than significant impacts with mitigation related to wasteful, inefficient, or unnecessary use of energy. Development under the Reduced Project Alternative would be implemented in compliance with applicable construction equipment idling regulations and state and UC San Diego programs increasing building energy efficiency; result in below the regional-average vehicle miles traveled; and use of renewable energy resources. Energy used would be reduced compared to the Update to the 2018 LRDP, as the overall development would be reduced. Impacts would be less than significant with mitigation, similar to the Update to the 2018 LRDP.

Conflict with Renewable Energy or Energy Efficiency Plan. As with the Update to the 2018 LRDP, the Reduced Project Alternative would implement energy efficient development and use clean energy sources in accordance with the UC Sustainable Practices Policy. Mitigation to decarbonize the Utilities Plant would remain applicable to the Reduced Project Alternative. Therefore, the Reduced Project Alternative would result in similar less than significant impacts with mitigation with regard to conflicting with renewable energy or energy efficiency plans.

GHG Emissions

Generate GHG Emissions. Under the Reduced Project Alternative, GHG emissions related to area, stationary, solid waste, and water sources would be reduced with the overall reduction in campus development compared to the Update to the 2018 LRDP. Mobile source emissions from off-campus traffic may be increased due to less on-campus housing being provided for students, faculty, and staff. However, the largest source of emissions would still be from natural gas, and decarbonization of the Central Utilities Plant would still be needed to meet the requirements of the current UC Sustainability Practices Policy. Thus, compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar, potentially significant impacts related to the generation of GHG emissions. Mitigation measures proposed for the Update to the 2018 LRDP would apply to the Reduced Project Alternative. Impacts would be reduced to a less than significant level with the implementation of mitigation measures GHG-1A and GHG-1B, similar to the Update to the 2018 LRDP.

Consistency with Applicable Plan. Compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar potentially significant impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions (UC Sustainable Practices Policy). Mitigation measures proposed for the Update to the 2018 LRDP would apply to the Reduced Project Alternative and would reduce the impact to a less than significant level, similar to the Update to the 2018 LRDP.

Noise

Exceed Noise Standards. Compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative (2018 LRDP) would result in similar noise impacts. The Reduced Project Alternative would entail less development than the proposed Update to the 2018 LRDP, thereby generating less noise and vibration during construction and operation activities and constructing fewer buildings that would feature stationary noise sources. However, given the decrease in on-campus housing, traffic noise levels may increase slightly due to the addition of commute trips. Also, given that less construction would occur compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar, though slightly less intensive, less than significant impacts with mitigation related to substantial temporary increases in ambient noise levels. Similar to the proposed Update to the 2018 LRDP, the noise impacts under the Reduced Project Alternative would be mitigated to a less than significant level.

Excessive Groundborne Vibration or Noise. While the Reduced Project Alternative would require less construction activity than the Update to the 2018 LRDP, the potential for construction activities to result in significant vibration impacts would remain. Construction vibration impacts would be mitigated below a level of significance for the Reduced Project Alternative, similar to the Update to the 2018 LRDP.

Population and Housing

Direct Inducement of Substantial Unplanned Population Growth. Compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in a similar impact with regard to direct inducement of substantial population growth as the same amount of population growth in the region could occur as the proposed Update to the 2018 LRDP. Similar to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in significant and unavoidable

impacts related to direct inducement of substantial population growth in the area. Additionally, compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar less than significant impacts related to indirect inducement of substantial population growth.

Displacement of Housing. Similar to the proposed Update to the 2018 LRDP, the No Project Alternative (2018 LRDP) would require temporary displacement of on-campus housing to redevelop higher density housing. In contrast to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would not provide housing for all new students as well as all new faculty and staff, thus creating a greater demand for additional off-campus housing and resulting in a greater growth-inducing impact compared to the proposed Update to the 2018 LRDP. Housing in the surrounding community is anticipated to accommodate the additional demand for housing from the campus population. Both the Reduced Project Alternative and the proposed Update to the 2018 LRDP would have a less than significant impact on displacement of substantial numbers of existing people or housing that necessitates construction of replacement housing.

Public Services

Fire Protection Facilities. Compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar impacts with regard to fire protection services. Under this alternative, student enrollment levels would remain the same as the Update to the 2018 LRDP, resulting in similar levels of population growth; however, once the 5.75-million-GSF development limit is reached, no further development of housing or academic uses would occur on campus. Additional students, faculty, and staff would reside off campus, where the demand for fire protection services would be distributed throughout other areas of the region. Thus, compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar, but less intensive, less than significant adverse physical impacts associated with the provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Police Protection Facilities. Compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar but less intensive impacts with regard to police protection services. Consistent with the discussion of fire protection services above, total campus population growth would be similar to the Update to the 2018 LRDP but additional students, faculty, and staff would reside off campus and the demand for police services would be distributed throughout other areas of the region. Thus, compared to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would result in similar, but less intensive, less than significant adverse physical impacts associated with the provision of new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.

Public Schools Facilities. Relative to schools, the Reduced Project Alternative could contribute to similar levels of increased enrollment of school-aged students at public school facilities compared to the proposed Update to the 2018 LRDP. The total number of students that may reside on campus would be reduced under the Reduced Project Alternative compared to the Update to the 2018 LRDP and these students may attend different local schools but are anticipated to primarily reside within the San Diego Unified School District. Similar to the Update to the 2018 LRDP, direct impacts resulting from the anticipated increase in students attending local area schools would be less than

significant, as current school facilities could accommodate the growth. However, future capacity and the potential need for expansion of existing schools or development of new school facilities to accommodate future growth depends on the overall population growth within the region, which is unknown at this time. Therefore, the Reduced Project Alternative could result in a cumulatively considerable impact to school facilities and cumulative impacts would be significant and unavoidable for the same reason as the Update to the 2018 LRDP.

Transportation and Circulation

Compliance with Circulation System Programs, Plans, Ordinances, or Policies. Similar to the Update to the 2018 LRDP, mitigation from the 2018 LRDP EIR related to LOS deficiencies would not apply to the Reduced Project Alternative. The Reduced Project Alternative would continue implementation of alternative transportation programs identified for the Update to the 2018 LRDP and would result in similar less than significant impacts related to conflicting with applicable policies, plans, or programs regarding safety or performance of public transit, bicycle, or pedestrian facilities.

Induce Substantial Vehicle Miles Traveled. As described in Section 3.10 of this SEIR for the proposed Update to the 2018 LRDP, UC San Diego campus proposed for development under the Update to the 2018 LRDP is located within a TPA as defined under CEQA; therefore, the presumption of no significant VMT impact pursuant to CEQA Guidelines Section 15064.3(b)(1) would apply, since none of the project-specific or location-specific factors identified in the LCI Technical Advisory indicate significant VMT would be generated. Similar to the proposed Update to the 2018 LRDP, the Reduced Project Alternative would have a FAR greater than 0.75 for future development (approximately 1.6), would not include more parking than required, would be consistent with SANDAG's 2021 Regional Plan, and would not replace affordable rental units with a smaller number of moderate- or high-income residential units. Therefore, the Reduced Project Alternative also would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be less than significant, similar to the Update to the 2018 LRDP.

Tribal Cultural Resources

Regional Loss of Tribal Cultural Resources. Development under the Reduced Project Alternative would generally occur within the same development footprint as the proposed Update to the 2018 LRDP, although at a reduced scale commensurate with the 30 percent reduction in development, including a reduction in Open Space Preserve development for utility improvements. No known tribal cultural resources occur in the Open Space Preserve area that would be avoided by this alternative; therefore, no change in the potential impact would occur. As with the proposed Update to the 2018 LRDP, unknown tribal cultural resources within the campus have the potential to be impacted by implementation of the Reduced Project Alternative. The Reduced Project Alternative would mitigate potential impacts to tribal cultural resources to a less than significant level through the incorporation of mitigation measures Cul-2D and Cul-2E. Cumulative impacts would remain significant and unavoidable, similar to the Update to the 2018 LRDP.

Utilities and Service Systems

New Utilities Facilities. New and expanded water, wastewater, storm water, energy, and telecommunications-related infrastructure would be required as part of implementation of the Reduced Project Alternative. Compared to the proposed Update to the 2018 LRDP, the Reduced

Project Alternative would result in reduced development, resulting in less demand for water, less wastewater generation, and less energy and telecommunications demand. While there would be less energy demand with the Reduced Project Alternative, the electrical substation would still be required. Similar to the proposed Update to the 2018 LRDP, impacts due to construction of new or relocated potable water, storm water, energy, and telecommunications infrastructure would be less than significant, although reduced compared to the Update.

Similarly, the Reduced Project Alternative would result in reduced wastewater flows into the campus' 21-inch sewer main south of La Jolla Village Drive. However, a sewer assessment would still be required to analyze the capacity of the City's downstream sewer mains. Impacts would be potentially significant, but reduced to less than significant with the implementation of mitigation measures Util-1 and Util-2. Therefore, the impact of the Reduced Project Alternative would be less than significant with mitigation, which is similar to the Update to the 2018 LRDP.

Water Supply Availability. Compared to the Update to the 2018 LRDP, the Reduced Project Alternative would result in reduced demand for water supplies. As sufficient water supplies from existing entitlements and resources would be available to serve anticipated growth with the Update to the 2018 LRDP, the reduced water demand from the Reduced Project Alternative would similarly be available from existing entitlements and resources. Impacts would be less than significant, similar to the Update to the 2018 LRDP.

Wastewater Treatment Capacity. The Reduced Project Alternative would reduce wastewater flows compared to the Update to the 2018 LRDP. However, as noted above, a sewer assessment would still be required to analyze the capacity of the City's downstream sewer mains. Therefore, the impact of the Reduced Project Alternative to wastewater treatment capacity would be less than significant with mitigation measures Util-1 and Util-2, which is similar to the Update to the 2018 LRDP.

Solid Waste Generation. Given less development would occur with the Reduced Project Alternative, a reduction in solid waste generation would occur compared to the Update to the 2018 LRDP. UC San Diego's commitment to reduce solid waste generation and increase diversion rates would continue. Therefore, similar to the Update to the 2018 LRDP, the impact of solid waste generation for the Reduced Project Alternative would be less than significant.

Compliance with Solid Waste Regulations. Consistent with the Update to the 2018 LRDP, the Reduced Project Alternative also would comply with federal, state, and local management and reduction statutes and regulations related to solid waste as development would comply with the UC Sustainable Practices Policy, Zero Waste Plan, and other requirements related to solid waste. Therefore, the impact would be less than significant, similar to the Update to the 2018 LRDP.

Wildfire

Emergency Response Plan or Emergency Evacuation. Under the Reduced Project Alternative, there would be a reduced development density and reduced overall population residing on campus compared to the Update to the 2018 LRDP. Overall student enrollment numbers, however, would remain the same as the proposed Update to the 2018 LRDP. Therefore, implementation of the Reduced Project Alternative could interfere with emergency response and evacuation on the campus through construction-related road closures, resulting in a potentially significant impact. However, similar to the Update to the 2018 LRDP, implementation of mitigation measures Haz-6

and WF-1 would address potential impacts to emergency response and evacuation plans and reduce those impacts to less than significant.

Wildfire Pollutant Concentrations. The reduced development density and reduced overall population residing on campus under the Reduced Project Alternative would decrease the number of campus residents that may be exposed to wildfire-related risks. Overall student enrollment numbers, however, would remain the same as the proposed Update to the 2018 LRDP. As with the proposed Update to the 2018 LRDP, the Reduced Project Alternative would not increase the risk of exposure to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire on campus. Campus-wide fire prevention and implementation of services such as plan review and construction inspections in accordance with current California building and fire codes would be implemented to reduce impacts related to wildland fires. Similar to the Update to the 2018 LRDP, impacts related to wildfire risks and pollutant concentrations would be less than significant.

Installation or Maintenance of Associated Infrastructure. Development under the Reduced Project Alternative would comply with all applicable regulations to mitigate fire risk, including the CBC and CFC and campus specific standards related to road access, defensible space, and utility infrastructure, resulting in less than significant impacts related to increased wildfire risk associated with installation and maintenance of infrastructure, similar to the Update to the 2018 LRDP.

Flooding or Landslides. The Reduced Project Alternative would generally result in development in the same areas as the Update to the 2018 LRDP, which, as discussed in Section 3.13.3.4, would not expose people or structures to significant risks related to flooding or landslides as a result of run-off, post-fire slope instability, or drainage changes. Compliance with the UC Seismic Safety Policy requirements and applicable geotechnical recommendations would also apply to development under the Reduced Project Alternative. Impacts would be less than significant, similar to the Update to the 2018 LRDP.

5.4.2.2 ABILITY TO ACCOMPLISH PROJECT OBJECTIVES (REDUCED PROJECT ALTERNATIVE)

The purpose of the Reduced Project Alternative is to achieve similar goals as the proposed Update to the 2018 LRDP while reducing density with the intent of addressing the significant development intensity impacts associated with the proposed Update to the 2018 LRDP.

The Reduced Project Alternative would accomplish six fundamental objectives identified for the proposed Update to the 2018 LRDP, including: locating campus buildings in accordance with the character, scale, and design goals expressed in guiding principles included in campus guidance documents (**Objective 3**); siting future development to allow for the co-location and strengthening of campus programs, facilities, and activities, to continue the exchange of ideas between academics and scientists, and to create synergy between shared resources and services (**Objective 4**); completing the redevelopment of the University Center on West Campus as a walkable "town center" (**Objective 6**); expanding and enhancing research and training facilities and core services at UC Health in support of the region's only academic medical center (**Objective 9**); implementing sustainable development practices related to campus planning, design, construction, and operations (**Objective 11**); and recognizing the importance of campus open spaces that form a balance with the built environment and continue to be responsible stewards of campus natural and biological resources (**Objective 12**).

The Reduced Project Alternative would fulfill four other objectives, but to a lesser extent than the Update to the 2018 LRDP. For example, it would not be able to fully provide undergraduate students with personalized academic services and close-knit intellectual and social environment outside of their academic department (**Objective 2**), since it would result in fewer facilities available to support the undergraduate students anticipated to enroll at UC San Diego in the future. Because growth would be curtailed, some co-location and expansion of campus programs and services that would have been implemented under the proposed Update to the 2018 LRDP may be limited or reprioritized to maximize the campus's ability to respond to California's higher education needs. Therefore, activating and enlivening the campus through additional on-campus housing to facilitate a living-learning campus environment (**Objective 5**); developing new faculty and staff housing to provide affordable options (**Objective 8**); and expanding multi-modal connections and TDM programs to optimize trip reduction benefits of the light rail transit system, reduce automobile commuting (**Objective 10**) would only be partially fulfilled.

The Reduced Project Alternative would not fulfill two of the stated objectives. The Reduced Project Alternative would only plan for a net increase of approximately 5.75 million GSF of development (instead of 8.3 million GSF), for a total of approximately 33.55 million GSF (compared to the approximately 36.2 million GSF total proposed with the Update to the 2018 LRDP), thus providing approximately 7 percent less total GSF and 30 percent less of a net increase than the proposed Update to the 2018 LRDP at buildout. Thus, this alternative would not accommodate projected growth by providing approximately 13 million GSF of new facilities needed to expand academic and non-academic programs (**Objective 1**). The Reduced Project Alternative would not provide housing for approximately 65 percent of the eligible student population by constructing new higher-density units and would not fully replace aging low-density units while taking into account affordability, financial feasibility, physical site constraints, and campus character (**Objective 7**).

In summary, out of the 12 stated objectives, the Reduced Project would be able to fulfill six objectives, partially fulfill four objectives, and not fulfill two objectives.

5.5 COMPARISON OF ALTERNATIVES / ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative, the alternative having the potential for the fewest significant environmental impacts, from among the range of reasonable alternatives that are evaluated. Table 5-3, *Comparison of Potentially Significant Impacts for Alternatives to the Update to the 2018 LRDP*, provides a summary comparison of the alternatives with the proposed Update to the 2018 LRDP with the purpose of highlighting whether each alternative would result in a similar, greater, or lesser impact, than the proposed Update to the 2018 LRDP with regard to potentially significant impacts. In addition, Table 5-4, *Ability of Project Alternatives to Meet Proposed Update to the 2018 LRDP Objectives*, provides a summary comparison of the alternatives with the proposed Update to the 2018 LRDP with the purpose of determining whether each alternative would meet the objectives of the proposed Update to the 2018 LRDP.

Table 5-3
Comparison of Potentially Significant Impacts for Alternatives to the Update to the 2018 LRDP

Issue Areas with Potential for Significant Impacts under the Update to the 2018 LRDP or its Alternatives	Update to the 2018 LRDP		Alternatives to the Update to the 2018 LRDP	
	Without Mitigation	With Mitigation	No Project (2018 LRDP)	Reduced Project Alternative
Aesthetics				
Scenic Vistas	PS	LS	=	=
Conflict with Zoning and Other Regulations for Scenic Quality	LS	N/A	=	=
Lighting and Glare	PS	LS	=	=
Air Quality				
Consistency with Applicable Air Quality Plan	LS	N/A	=	=
Cumulatively Considerable Net Increase of Nonattainment Criteria Pollutants	PS	LS	>	=
Impacts to Sensitive Receptors	LS (CO hotspots); PS (TAC emissions)	N/A (CO hotspots); SU (TAC emissions)	=	=
Odor Emissions	PS	LS	<	=
Biological Resources				
Candidate, Sensitive, or Special-Status Plant Species	PS	LS	=	=
Candidate, Sensitive, or Special-Status Animal Species	PS	LS	=	=
Riparian Habitat and Other Sensitive Natural Communities	PS	LS	=	=
Wetlands	PS	LS	=	=
Cultural Resources				
Historical Resources (Built Environment)	PS	LS or SU	=	=
Archaeological Resources	PS	LS	=	=
Human Remains	PS	LS	=	=
Energy				
Wasteful, Inefficient, or Unnecessary Use of Energy	PS	LS	<	=
Conflict with Renewable Energy or Energy Efficiency Plan	PS	LS	<	=
Greenhouse Gas Emissions				
Generate GHG Emissions	PS	LS	<	=
Consistency with Applicable Plan	PS	LS	<	=
Noise				
Exceed Noise Standards	PS	LS	=	=
Excessive Groundborne Vibration or Noise	PS	LS	=	=
Population and Housing				
Direct Inducement of Substantial Unplanned Population Growth	PS (direct); LS (indirect)	SU (direct); N/A (indirect)	=	=
Displacement of Housing	LS	N/A	=	=

Issue Areas with Potential for Significant Impacts under the Update to the 2018 LRDP or its Alternatives	Update to the 2018 LRDP		Alternatives to the Update to the 2018 LRDP	
	Without Mitigation	With Mitigation	No Project (2018 LRDP)	Reduced Project Alternative
Public Services				
Fire Protection Facilities	LS	N/A	=	=
Police Protection Facilities	LS	N/A	=	=
Public School Facilities	LS (direct); PS (cumulative)	N/A (direct); SU (cumulative)	<	=
Transportation and Circulation				
Compliance with Circulation System Programs, Plans, Ordinances, or Policies	LS	N/A	>	=
Induce Substantial Vehicle Miles Traveled	LS	N/A	=	=
Tribal Cultural Resources				
Regional Loss of Tribal Cultural Resources	PS	LS (direct) SU (cumulative)	=	=
Utilities and Service Systems				
New Utilities Facilities	PS	LS	<	=
Water Supply Availability	LS	N/A	=	=
Wastewater Treatment Capacity	PS	LS	<	=
Solid Waste Generation	LS	N/A	=	=
Compliance with Solid Waste Regulations	LS	N/A	=	=
Wildfire				
Emergency Response Plan or Emergency Evacuation	PS	LS	=	=
Wildfire Pollutant Concentrations	LS	N/A	=	=
Installation or Maintenance of Associated Infrastructure	LS	N/A	=	=
Flooding or Landslides	LS	N/A	=	=

LS Less than significant impact
PS Potentially significant impact
SU Significant and unavoidable impact
N/A Not applicable (i.e., no mitigation measures proposed)
= Impact level would be similar to the proposed Update to the 2018 LRDP
> Impact level would be greater than the proposed Update to the 2018 LRDP
< Impact level would be less than the proposed Update to the 2018 LRDP

Table 5-4
Ability of Project Alternatives to Meet Proposed Update to the 2018 LRDP Objectives

Update to the 2018 LRDP Project Objectives	Ability of Alternatives to Meet the LRDP Project Objectives	
	No Project (2018 LRDP)	Reduced Project
1. Accommodate projected growth and address life-safety and deferred maintenance of existing buildings by demolishing approximately 1.1 million GSF and providing approximately 13 million GSF of new facilities needed to expand academic and non-academic programs in support of the UC mission and its commitment to excellence in teaching, research and public service.	No	No
2. Maintain and support UC San Diego's unique undergraduate college system within the larger University setting to provide undergraduate students with personalized academic services and close-knit intellectual and social environment outside of their academic department	Partial	Partial
3. Locate buildings on campus in accordance with the character, scale, and design goals expressed in the Master Planning Studies, Neighborhood Planning Studies, previous LRDPs, and the LRDP's guiding principles and its required elements.	Yes	Yes
4. Site future development to allow for the co-location and strengthening of campus programs, facilities, and activities, to continue the exchange of ideas between academics and scientists, and to create synergy between shared resources and services.	Partial	Yes
5. Activate and enliven the campus through strategic mixed-use and transit-oriented development, improved public spaces, expanded campus services, and additional on-campus housing to facilitate a living-learning campus environment.	Partial	Partial
6. Complete the redevelopment of the University Center on West Campus as a walkable "town center" featuring a mix of uses, urban densities, and pedestrian-activated ground floors, with connections to adjacent neighborhoods and the future light-rail transit station at Pepper Canyon.	Yes	Yes
7. Provide housing for approximately 65 percent of the eligible student population by constructing new higher-density units and replacing aging low-density units while taking into account affordability, financial feasibility, physical site constraints, and campus character.	No	No
8. Develop new faculty and staff housing to provide affordable options and remain competitive with peer academic institutions in attracting top talent.	Partial	Partial
9. Expand and enhance research and training facilities and core services at UC Health in support of the region's only academic medical center.	No	Yes
10. Expand multi-modal connections and TDM programs to optimize trip reduction benefits of the light rail transit system, reduce automobile commuting, and coordinate campus plans with the regional transportation programs.	Partial	Partial
11. Minimize environmental impacts of growth through the implementation of sustainable development practices related to campus planning, design, construction, and operations.	Yes	Yes
12. Recognize the importance of campus open spaces that form a balance with the built environment and continue to be responsible stewards of campus natural and biological resources.	Yes	Yes

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines require the identification of an Environmentally Superior Alternative among the alternatives analyzed in an EIR. Based on a comparison of the overall environmental impacts for the described alternatives, the No Project Alternative (2018 LRDP) is identified as the Environmentally Superior Alternative. The No Project Alternative (2018 LRDP) would eliminate the Update's significant and unavoidable cumulative impact associated with public schools. Significant and unavoidable impacts associated with air quality (TACs), historic resources, population and housing, and tribal cultural resources would not be reduced by the No Project Alternative (2018 LRDP). Potentially significant impact but mitigable impacts to air quality (odors), energy, GHGs, and utilities (new utilities, wastewater) would be avoided by the No Project Alternative (2018 LRDP). Impacts associated with air quality (cumulatively considerable impacts to criteria air pollutants), and impacts associated with Transportation and Circulation (LOS impacts) would be greater than the Update to the 2018 LRDP. Out of the 12 stated objectives, the No Project Alternative (2018 LRDP) would be able to fulfill four objectives, partially fulfill five objectives, and not fulfill three objectives.

According to CEQA Guidelines Section 15126.6(e), if the No Project Alternative is selected as the environmentally superior alternative, then the SEIR shall also identify an environmentally superior alternative among the other alternatives. Of the remaining alternatives, the environmentally superior alternative would be the Reduced Project Alternative. Significant and unavoidable impacts associated with air quality (TACs), historic resources, population and housing, and tribal cultural resources, and public schools (cumulative) would be partially reduced but not avoided by the Reduced Project Alternative. Impacts associated with air quality (cumulatively considerable impacts to criteria air pollutants), and impacts associated with Transportation and Circulation (LOS impacts) would be less than the No Project Alternative (2018 LRDP). Impacts associated with air quality (odors), energy, GHGs, and utilities (new utilities, wastewater) would require mitigation to reduce impacts to less than significant. Out of the 12 stated objectives, the Reduced Project would be able to fulfill six objectives, partially fulfill four objectives, and not fulfill two objectives.

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