#### UCPG La Jolla Innovation Center DRAFT EIR Subcommittee

#### Recommendation to the UCPG

The LJIC subcommittee makes the following recommendation to the UCPG:

The "Two-story Office Alternative" should be built rather than the Preferred Project, a seven story office and educational building. This is also known as "Alternative 2". (This project would not be a UC San Diego project.)

Further, the LJIC Subcommittee recommends that the UCPG endorse the following comments on the DRAFT Environmental Impact Report (DEIR):

Comment #1 on page 2. Comment letter from Charles Kaminski.

Comment #2 on page 4. Comment on visual, aesthetics, and cumulative effects.

Comment #3 on page 10. Comment on architecture and visual effects.

Comment #4 on page 11. Comment on transportation and circulation.

Comment #5 on page 14. Comment on architecture and visual effects.

Comment #6 on page 15. Comment on the overall project.

#### **Summary:**

The Subcommittee met four times to consider the proposed project, the project alternatives, and to comment on the Draft Environmental Impact Report submitted by UC San Diego for the La Jolla Innovation Center. Two main areas of concern were identified: exceeding the 30' Coastal Height Limit ("Prop D") for this area, and the traffic congestion and circulation issues that adding this project to the area would cause. Reducing the size of the project to a two story building ("Alternative #2") would conform to the 30' height limit and reduce the traffic, aesthetic, and visual impact of the project on the surrounding commercial and residential areas.

#### Action:

The UCPG may choose to endorse the subcommittee's recommendation on project alternative, or endorse the UC San Diego full project, or take no action.

The UCPG may choose to endorse any comment, or take no position on a comment.

#### **Draft Environmental Impact Comment #1 – Community Member**

From: Charles Kaminski [charleskaminski23@gmail.com]

I submit these questions to the subcommittee for consideration the meeting tonight.

The University of California, San Diego resides on the land of the Ipai-Tipai (EE Pie, Tea Pie), also known as the Kumeyaay Nation. There have been waves of colonization that have oppressed these nations and treaties that were signed and then broken by the United States, specifically our local treaty of Santa Ysabel.

- 1. How will the University mitigate and pay respect to the many elders, and to the tribe of this land both past, present, and future through the construction and planned operation of this facility?
- 2. The height image in Aesthetics Section is misleading. It does not reconcile with Coastal Zone height limit. Showing baseline comparisons should indicate actual building height and its conformity in the Coastal Zone height limit of 30 ft. As this proposed building exceeds the 30ft height limit, what mitigation measures is the University proposing to offset the increase in height?
- 3. The property, previously privately owned, paid County of San Diego property taxes and various other taxes and fees obligated to County and City of San Diego as required. As the property is now in State ownership via the Regents of the University of California purchase, how is the University mitigating the loss of revenue from the property from private to State owned? Are any taxes or fees to be paid and collected under the public-private development proposed for the project? Please indicate which taxes, fees, etc are to be paid, to which entities they will be paid, when they will commence to be paid and the term length of payment.
- 4. The property development is adjacent to various professional, research and clinical facilities as well as residential complexes. This project, while under construction, will include noise, dust, vibration, traffic, etc. that will migrate from the site to the adjacent functioning businesses and residents. How will the project mitigate noise and environmental construction elements that are typically created during a construction project?
- 5. The site is tightly contained. How will the project manage and control construction staging, hours of operation and parking without impacting access to adjacent businesses and residents? Where is the construction staging and construction parking for workers proposed to be located? What are the mitigation measures planed?
- 6. The project is defined as an Innovation Center yet the University is only seeking a LEED Silver status, which is the minimum requirement for UC buildings. How will a LEED Silver facility mitigate the cumulative effects of climate change, environmental challenges and improve the health and well being of both the building occupants and the surrounding community?

- 7. As a parcel under private ownership, any development would need to meet City requirements for planning, zoning, etc. Please indicate the deviations from what would be required if privately developed and indicate how any deviations would be mitigated.
- 8. The University recently moved forward to lift deed restrictions on two parcels of land on the East Campus to support building projects using a public-private development approach. The Innovation Center project seems like a likely candidate for that location as well as in the Science Research Park located on East Campus. Please explain why this project is unable to be developed on the East Campus.
- 9. It is assumed that the consultant engaged to prepare the EIR report will provide an unbiased analysis of the facts and findings. Will the preparer of this report unequivocally state they there was no bias towards their client for the findings of the report in favor of their client as well as influence on the part of their client, the University, to alter modify, wordsmith, etc any of the facts and findings in favor of the University?
- 10. The university proposes parking on 2 or 3 levels at street level and above. The intersection of La Jolla Village Drive and Villa La Jolla has significant pedestrian use from the VA and UCSD. What are the setbacks of the development from the street? How will construction manage pedestrian use of the sidewalks and vehicular visibility due to construction? How will the project mitigate impacts to pedestrian quality of walkability?
- 11. Adjacent to the site is the UCSD Health Sciences Urgent Care Facility. What will be the impact on the operation and use of this medical facility?

Thank you. Charles Kaminski

# La Jolla Innovation Center DRAFT Environmental Impact Report Comment #2 Aesthetic, Visual, and Cumulative Effects

La Jolla Village Drive is a natural dividing line separating the UCSD campus from the residential and commercial areas to the South of the Campus. The proposed project area is within the 30 foot coastal zone; it is located at the bottom of two steep hills on either side of LJVD; and it is midway between two new trolley stops (VA and Villa La Jolla shopping area). The existing commercial space is nestled into the trees separating it from the adjacent multifamily condominium units.

The intersection of LJVD and Villa La Jolla, on which corner the proposed project is to be built is a heavily impacted intersection where traffic routinely backs up, making ingress and egress into the commercial where this area is located extremely difficult.

Because of the existing traffic problems at this intersection bike travel and pedestrian traffic is already hazardous and likely to be made worse with the increased density on the proposed site.

The project consists of a 1.2 acre development which is currently privately owned. If the project is approved .9 acres will be sold to UCSD and leased back by the current, private owner, GPI companies. It is unclear whether the remaining .3 acres of surface development within this project will continue to be a part of the project as opposed to being developed / sold for other purposes.

Project seeks to relocate UCSD health related offices occupying 56,500 sq. feet in "The Campus" at 8950 Villa La Jolla in a building that falls short of UC Regents' seismic standards. Additionally, the project also proposes to move the occupants of the 38,200 sq. foot extension buildings located on the UCSD campus into the proposed space.

The proposed new project includes 103,314 gross square feet of which 1420 on the lower floor will be developed as a café. (101,894 balance for offices/classrooms)

The anticipated occupants in the new building number 947 with a maximum capacity of 2027.

DEIR comments at issue which were (incorrectly) found to be insignificant are:

"Implementation of the proposed project does not substantially degrade the existing community character of the area adjacent to the project site and once acquired by UC regents would not conflict with regulations regarding scenic quality."

"The project would not cause a significant environmental impact due to a conflict with any land use plan, policy or regulation for the purpose of avoiding an environmental effect."

The 30 foot height limit needs to be maintained in this area to be consistent with the terrain and the adjacent residential usage.

UCSD high rise buildings, located at a higher elevation on the UCSD campus should not be used as a basis for determining design of this property located adjacent to a residential neighborhood, with a backdrop of tall trees, at the base of two hills. (is it essentially in the base of a canyon?)

A seven story building will substantially impact the numerous residents upslope from the proposed project in terms of their view of a wooded slope and in terms of the lights at night illuminating their homes.

Allowing this property to be built at 100 feet will block and dwarf all of the surrounding properties. Furthermore, it opens the door to other potential waivers of the existing coastal 30 foot height limit. The entire 7 acre commercial space is in need of redevelopment, not just the now vacant rock bottom brewery.

The representations made by UCSD in the presentation to UCPG to the effect that "there is no space on the UCSD campus for a building to house the proposed uses" appears to be incorrect.....there are plenty of unbuilt areas (including surface parking lots) on the UCSD campus. No doubt, the 2018 long range development plan of the campus included a space to which the Extension program would be relocated. Where and why is that plan not being followed? The East Campus provides public facing opportunities for a building to house both the health related offices and the Extension program in even closer proximity to the trolley (Preuss station) and likely with much greater parking access and less traffic congestion.

While the 2-story classroom educational building alternative is designated as the environmentally superior project, the alternative 2 level office building almost completely duplicates the square footage of office space that UCSD is losing in old "the Campus" building due to the lack of seismic retrofits. The currently occupied office space by UCSD health in "the Campus" is 56,500 square feet. The alternative 2 story office building would provide a modern, well laid-out, and well planned 45,345 square feet of office space.

The DEIR makes no reference to other projects that have been considered in this commercial area. However, it is telling that sometime in the early 2000 time period a proposed 107 condo unit project was proposed in the "St. Germaine" strip mall area. The project was strongly opposed by the community in part due to the traffic and parking concerns – which conditions still exist today. Since that project proposal expired in 2008 without further action, the conditions on Villa LaJolla and LJVD have not improved whatsoever. The traffic has increased, the parking problem is worsened and the intersections are even more hazardous particularly to bikes and pedestrians.

The UC Plan Update is currently underway with a concentration on numerous areas that effect the UC community. The suggestion in the DEIR that this proposed project is consistent with the existing community plan is incorrect. The DEIR states "A key objective for the Central Subarea of the City's Community Plan is to improve the central community's urban form and cohesiveness a new construction continues...." The plan referenced is from \_\_\_\_\_ and is not a consideration in the Plan Update currently underway. Further the intersection at issue is not in the "central community."

The adjacent Marriot Residence Inn multi unit pods are 2 story buildings, not 3 stories as the DEIR states.

## **Project Cumulative Impacts**

I. CEQA requires analysis of a proposed project's Cumulative Impacts.

Cumulative impacts are impacts on the environment that result from the incremental impacts of a proposed project when added to other past, present and reasonably foreseeable future actions (State CEQA Guidelines Section 15355[b]

- Where a significant cumulative impact exists, the key issue is whether the project would make a cumulatively considerable contribution to that impact.
- It is possible that a project may make a cumulatively considerable contribution <u>even</u> when the project's individual impact is less than significant.

Incremental effects are those that are cumulatively significant - that is, if the project's effects are significant when considered together with related effects of past, current, and probable future projects.

A cumulative impact is one that results from the combined effects of past, present and reasonably foreseeable future projects or activities. CEQA requires an EIR to discuss the cumulative impacts to which the project would contribute, and the importance of that contribution in the context of the cumulative impact.

II. The DEIR fails to acknowledge or analyze the Cumulative Impacts of the proposed project. The DEIR states that Cumulative Impacts of the project not considered significant.

The DEIR states (p. 2-1)

- "The site is currently within the jurisdiction of the City of San Diego"
- "The site is also currently within the City's Coastal Height Limit Overlay Zone"
- "Upon acquisition of the property, the Project site would be under the ownership and use of the UC Regents and would be subject t to UC land management policies. The Project would be developed following UC Regents approval and after the purchase transaction is completed."

The DEIR fails to acknowledge the significance of the project's location in the Coastal Height Limit Overlay Zone. The Coastal Height Limit was passed by the voters of San Diego in 1972 and implemented in 1976.

- The height limit for buildings in the "Coastal Zone" is 30' (between the Ocean and I-5).
- Development over 30' requires approval of the City of SD voters
- -The proposed Project would be 100' high over three times the 30' height limit.
- Current buildings in the areas, including renovations, have complied with the 30' height limit.

As the NOP states, "Upon acquisition of the property, the Project site would be under the ownership of the UC Regents, subject to UC land management policies." UCSD is not subject to the 30' height limit.

The Proposed Project thus provides a new mechanism for a private developer and UCSD to avoid the 30 foot height limit: <u>UCSD will own the land underneath the building</u> (which is not on its campus); <u>GPI will finance</u>, <u>build and manage the building</u>, thus avoiding compliance with the 30' height limit.

III. A Primary Objective of the Project is to: "Develop a financially feasible project through a strategic public-private partnership opportunity."

Clearly a reasonably foreseeable future impact is that UCSD will pursue additional public-private partnerships that enable it to:

- Acquire additional properties not on the campus, both in the immediate area of the proposed Project but in other areas near campus as well

- Enable such public-private partnerships to avoid compliance with the 30' height limit and potentially with other aspects of the University Community Plan and City regulations
- Convert properties currently in the private sector to a variety of UCSD uses
- Allow properties where the land is owned by UCSD but that are not leased to UCSD or only have a small portion leased to UCSD, to avoid the 30' height limit (the current project is not fully leased to UCSD, as it includes a lease for a café)

## IV. It is reasonably foreseeable that such public private partnerships in this area will appeal to the private sector as well and may proliferate.

These might include high-rise buildings for student housing, mixed use office and retail. These might well include buildings that have UCSD leases for a portion of the building, but also leases for other clients. In an indication of this reasonably foreseeable impact, GPI describes itself as "a full-service commercial real estate investment and operating platform which specializes in the acquisition, development, repositioning, and management of office retail, multifamily, and mixed-use properties located in California's major metropolitan areas."

#### V. The Project Objectives reinforce this reasonably foreseeable Cumulative Impact.

Most of the Project Objectives in the DEIR could be applied to future public private partnerships near the campus. UCSD could acquire more land and expand well beyond its campus. This is particularly true of the area near the Project. Most of this project's primary objectives could apply to any of the Project's nearby properties.

The DEIR states as attributes of the Project's location that it is a Strategic Location given its proximity to:

- Main Campus
- Pedestrian/bicycle bridge to campus
- Two light rail stations nearby

VI: The DEIR misleadingly claims there is no conflict with applicable plans - they mention plans which the project will avoid having to comply with once UCSD owns the land.

At P. 3.6-8, the DEIR states that there would be no conflict with applicable plans (the University Community Plan, The City of San Diego Municipal Code) and that these documents "would ensure off-campus development projects would substantially comply with zoning, density, development standards, design review, and, when applicable, construct subsequent CEQA analysis to mitigate potential impacts." This statement is misleading. It fails to mention the 30' height limit. But more importantly, it fails to mention that UCSD's purchase of the Project site (or additional properties in the area) means the Project is no longer subject to compliance with the Community Plan or other aspects of the City's Municipal Code, including the 30' Coastal Overlay Zone.

### VII: Growth inducement: The DEIR utterly fails to address this major issue

CEQA requires a project to address the ways in which a proposed project directly or indirectly fosters growth. As the DEIR states (p. 4-17), "Growth can be induced in a number of ways, including the elimination of obstacles to growth. . ."

The DEIR simply states (p. 4-17):

"No new growth-inducing effects would be expected as a result of implementing the proposed Project."

Clearly, the Project may have major growth-inducing effects in that it removes a major obstacle to growth in the area by employing a mechanism that allows a private developer and UCSD to pursue a development partnership that avoids compliance with the 30' height limit on a property that is not on the UCSD campus.

## **Architectural and Visual Comment #3**



- Massing doesn't work
- Looks like an attempt to make seven stories look like three
- Treatment of the corner is terrible
- This building turns its back on the corner and should have a more interesting, welcoming, open appearance
- We are not opposed to the height, but the mass of this building is not appropriate
- The screening on floors ~1-2 looks like it is hiding a central plant or other building systems
- The box design has been overdone and isn't creative
- The above rendering makes Villa La Jolla look flat
- Does not embrace progressive mobility options

## UNIVERSITY COMMUNITY PLANNING GROUP

## La Jolla Innovation Center Subcommittee

#### **Traffic Comments**

Please consider the following comments regarding the La Jolla Innovation Center:

- 1. How is the project building's location superior for UC Extension and UC Health Science (i.e., building occupants will be required to navigate on heavily trafficked and used public streets, sidewalks, and transit) than occupants would have on campus; where access for pedestrians, scooters, bicyclists, etc. is infinitely safer, more prevalent, and offers a vastly better experience? (Ref: section ES.5 Issues Raised During Public Scoping, pg. ES-6, PDF pg. 20.)
- 2. DEIR cites "abundant alternative transportation options," such as "bike and pedestrian access," with no mitigation needed (see DEIR pg. 2-5/pg. 46 in PDF). Yet, there are no adjacent class II or class II bike lanes/sharrows existing on La Jolla Village Drive or Villa La Jolla Drive adjacent to the project and may not be for years. The nearest bike lanes are on Gilman and Nobel a significant distance (1/3 mile) west and south. The sidewalks surrounding project site are not fully ADA compatible nor designed for heavy usage; i.e., the west sidewalk on Villa La Jolla is double-wide only in spots and partially blocked by utility boxes. The sidewalk to the east on Villa La Jolla and north on La Jolla Village Drive and both narrow and cannot accommodate shared use, unlike downtown San Diego.
- 3. Why is the DEIR referencing UC Sustainability Practices Policy (see pg. 2-5, item 6 under Project Objectives) if this project is considered off campus? If this project is on campus, then why is it that the project is not following the campus TDM (Transportation Demand Management) document on expanding programs (pg. 27, item 7 b &c)?
- 4. How will sustainability for the campus and community improved in this transit zone in accordance with the UC Policy on Sustainable Practices and the City of San Diego Mobility Element? Sidewalk and crosswalk access is insufficient compared to other urban nodes, such as downtown (refer to Pedestrian Safety Study).
- 5. What is the circulation pattern at the project's driveways? Figure 12 (PDF pg. 64) shows only circulation route and not the direction of travel; i.e., whether the driveways are a one-way entrance, a one-way exit or bi-directional.
- 6. What mitigation steps will be taken at the driveways' entrance and exit so that motorists avoid pedestrians and others (bicyclists, scooters, skateboards, etc.) on the public sidewalk and roadways as well as those going through the property (see DEIR pg. 2-13, para 2.3.9, on PDF pg. 62)?
- 7. How will the project's new sidewalk connection impact public access to the overpass and Gilman Drive via the existing 6' wide sidewalk? (Ref: DEIR pg. 2-13, para 2.3.9, on PDF pg. 62).

"The new sidewalk connection would be paved along the western and southern

sides of the building and connect to a new ADA-accessible access ramp from the Project site to the Villa La Jolla Drive sidewalk along the eastern side of the building. A set of stairs would be provided off the eastern building stairwell to connect that exit to the Villa La Jolla Drive sidewalk."

- 8. How will integrate the overpass integrate with the project and the sidewalk? The DEIR omits the new sidewalk connection in its renderings (ref: Pre- and Post-Project Views, Fig. 3.1-3a thru Fig. 3.1-3d on PDF pgs 93 to 96).
- 9. How will the university meet its campus sustainability requirements (<u>UC Sustainability Practices Policy</u>) when 1) UC projects outside of campus are being done in a piecemeal fashion in the University Center campus neighborhood, e.g., recent additions of UCSD Urgent Care and Internal Medicine Clinics 2.) unlike private projects; the university does not contribute to the Facility Benefit Plan and expects the city to fund traffic infrastructure (sidewalks, crosswalks, lights, etc.) in the public right-of-way. (Ref: Impact Analysis pg. 3.8-11, PDF pg. 248)

"No improvements are proposed to these roadways. ... The Project would have a less than significant impact in relation to a substantial increase in circulation hazards, and no mitigation is required."

10. How will the project be built without impacting sidewalk access, constricting traffic flow on adjoining streets, or impacting access in and out of residential driveways south of the project site? (See DEIR pg. 3.8-11 or PDF pg. 248.)

As described in the Project Description, a TCP would be prepared prior to Project construction and implemented to allow safe and effective circulation of all road users (i.e., motorists, bicyclists, and

pedestrians) through and/or around temporary traffic control zones). Traffic management controls would include measures determined based on site-specific conditions, including, but not limited to, the use of construction signs, flaggers, delineators, and lane closures.

11. How are "impacts related to transportation...less than significant" and not requiring of mitigation when the impact analysis says (see DEIR pg. 3.8.12, pdf page 249):

Traffic management controls would include measures determined based on site-specific conditions, including, but not limited to, the use of construction signs, flaggers, delineators, and lane closures.

- 12. How will emergency response times to the local community be ensured with the increase in congestion caused by the additional people using the facility, especially given the campus continuing drive to expand its footprint into the neighboring community?
- 13. It is suggested that any transportation analysis take into account the impacts of the project on multimodal transportation, including impacts to walking and biking. Impact

- mitigation should include consideration of how to provide safe and comfortable bicycling and walking connections to surrounding destinations.
- 14. What provision is being made for bicycle racks, electric scooters and motorcycle spaces in project parking areas? (Ref: Appendices, pg. 5, PDF pg. 51, "Provision of covered, secured bicycle parking/storage for 15 bicycles to encourage the use of non-motorized transportation options.")
- 15. It is suggested that the traffic analysis, that was conducted in May 2020, be retaken or adjusted based on earlier traffic studies. It is unfair for the project to analyze traffic during a lockdown period when San Diego was undergoing widespread closures and traffic was at an all-time low.
- 16. Why are ADTs listed Appendices section 2.1 Trip Generation (PDF pg. 1767-68) and VMTs in Appendix A and section 4? Aren't the calculations for ADTs vs VMT different?
- 17. It is suggested that Table 2-1 or thereafter include a converter or other means to compare ADTs to VMTs, thus provide a clear and consistent presentation for readers.
- 18. How was building usage times and resulting occupancy calculated over the course of the day and evening?
- 19. What are the breakdowns between UCSD Health Sciences and UCSD Extension in the hours they use the building? For example, section 2.1 Trip Generation calculates "The net increase in traffic generation is calculated at 202 ADT with 103 total AM peak hour trips (146 inbound/ -43 outbound) and 99 total PM peak hour trips (-29 inbound / 128 outbound)." How could there be negative inbound trips in the PM assuming that there will be extension classes in the evening as is normal for working professionals.
- 20. Do the ADT calculations assume only a 9am-5pm usage model, where no one leaves in the AM and no one arrives in the PM?
- 21. How are the cumulative impacts to traffic and infrastructure in the surrounding community be accounted for in the piecemeal projects being developed in the University Center campus neighborhood? For example, in recent years UC Urgent Care and Internal Medicine projects were added. (Ref: UCSD 2018 LRDP, PDF pg.31). Projects south of La Jolla Village Drive are not accounted for in the 2018 LRDP.

## **Architectural and Visual Comment #5**

- 1) The UCSD preferred alternative building is very different in appearance from neighboring off-campus buildings.
- 2) Am concerned about pedestrian safety on-site.
- 3) The proposed balconies are very exposed to major street frontages and may be attractively screened with landscape and/or building materials.

#### **Project Comment #6**

#### La Jolla Innovation Center

First let me state that I have always supported UCSD projects on the campus, however, this project is not within the boundaries of the campus but in the community and should abide by community/city regulations. Purchasing the land should not then make it part of the UCSD campus. UCSD can purchase property within the San Diego community but it is still within the Community Plan Implementation Overlay Zone and within the City's Costal Height Limit Overlay Zone.

#### **Height limit:**

The DEIR states that "the site is currently within the jurisdiction of the City of San Diego and is zoned as Commercial CO-1-2). The site is also within the City's Costal Height Limit Overlay Zone, Community Plan Implementation Overlay Zone, and the Parking Impact Overlay Zone. Upon acquisition of the property the Project site would be under the ownership of the UC Regents, subject to UC land management policies. The University would occupy the proposed office and instructional space and would include programs associated with UC San Diego Health Sciences and UC San Diego Extension." UCSD can build whatever they wish with UC Regents land management policies on their own main campus BUT to the surrounding community this site, even if they purchase the land, is not part of the campus and ignores city regulations which protect the community from oversized buildings with their repercussions. The nearby Marriott is two stories and the Boardwalk condos are three stories and all fall within the 30' height limit whereas the UC proposed building would be seven stories 100'and out of proportion with the surrounding community. UC compares it to a building on the north side of La Jolla Village Drive, which is of similar height, but that is not close and is on the UCSD campus. Essentially La Jolla Village Drive is a clear demarcation for the community and the UCSD campus.

#### **Transportation & circulation:**

Vehicular access to the Project site would be provided by the two existing driveways to the commercial center from Villa La Jolla Drive and the Villa Norte cul-de-sac. However, the La

Jolla Village Drive intersection with Villa La Jolla Drive is already very impacted and adding 900+ people

To a building on the corner of this intersection will just add to the circulation problem.

Stating the ADDITIONAL 900 people is correct since when the office building called The Campus is vacated by the UCSD researchers and they move into the new building, the lease agency will again lease these offices so that even if UCSD researchers are moving, they will be replaced with an equal number of people. The VMT analysis, for the proposed office uses is stated as less than 85% of the Regional average and would not result in a net increase in total Regional VMT but this does not seem to take into account that there would in the future be at least 900+ increase in drivers, pedestrians, and bikers.

Pedestrian access to the Project site would be provided via a new sidewalk connection to La Jolla Village Drive and via an existing City-owned pedestrian bridge that crosses La Jolla Village Drive and provides direct access to the Health Sciences portion of the UC San Diego campus. Currently the pedestrian bridge does not lead directly to this new proposed building.

Though the site is within 1/3 mile of the trolley or within the Priority Transit District there does not seem to be any accommodation for pedestrians and bikers to get from the trolley to the proposed site. Sidewalks and crossings need to be investigated to see if there really is easy access within the PTD to the site.

#### **Preferred Alternative:**

The environmentally preferred alternative would be an office building which complies with the current and surrounding height limit of the community. This would enable the university to move their researchers out of The Campus buildings (which do not meet the UC Regents earthquake safety regulations) and still keep them near enough to the VA hospital and health science buildings on the UCSD campus.