



514.876.4200  
514.876.4205  
799-1411 (USA, Extrem. Sit.  
Des and. CA 94162  
www.lozeaudrury.com  
info@lozeaudrury.com

*Via Email*

October 27, 2022

Jeff Szymanski, Senior Planner  
Development Services Department  
City of San Diego  
1222 First Ave.  
San Diego, CA 92101  
[DSDEAS@SanDiego.gov](mailto:DSDEAS@SanDiego.gov)

**Re: Comment on Draft Environmental Impact Report, Scripps Mercy Hospital Campus Project (Project No. 658548; SCH No. 2021040374)**

Dear Mr. Szymanski:

I am writing on behalf of **Supporters Alliance for Environmental Responsibility ("SAFER")** regarding the Draft Environmental Impact Report ("DEIR") prepared for the Scripps Mercy Hospital Campus Project (Project No. 658548; SCH No. 2021040374), including all actions related or referring to the proposed construction of two 15-story hospital towers totaling approximately 631,590 and 380,000 square feet respectively (Hospital I and Hospital II), a three-story Hospital Support Building with three levels of subterranean parking, a seven-story Medical Office Building with two levels of subterranean and three levels of above-ground parking, an ambulance drop-off area, a loading dock area, a central energy plant expansion, and utility yards, located on a 21.07-acre site north of Washington Street, south of development along Arbor Drive, west of State Route 163 (SR 163) and Eighth Avenue, and east of Fourth Avenue in the City of San Diego ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Development Services Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project.

We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

E-1

E-2

E-3

**E-1** Comments re-state a description of the project as provided in Chapter 3.0 of the EIR. No response is needed.

**E-2** Comment makes assertions that the Draft EIR fails as an informational document and fails to impose mitigation measures that reduce the project's impacts. However, the comment provides no specific information regarding where the EIR is deficient.

The EIR adequately and completely addresses any and all impacts associated with implementation of the Scripps Mercy Hospital Campus project and determines that the project would result in significant impacts with regard to Land Use (operational noise due to an increase in vehicular trips generated by the project on Fourth Avenue), Air Quality (diesel exhaust emissions due to project construction activities), and Noise (construction noise and operational noise impacts associated with traffic noise). Feasible and implementable mitigation measures are presented in the EIR, would be required as part of the project, and would reduce all impacts to below a level of significance, with the exception of operation noise impacts associated with increased vehicle trips on Fourth Avenue. Operational noise impacts would remain significant and unmitigable. As clearly stated in Chapter 10.0, *Alternatives*, implementation of the No Project/No Build alternative would avoid operational noise impacts.

**E-3** Comment noted. Comment does not address the sufficiency or adequacy of the Draft EIR. No response is necessary.

E-3  
Cont.

October 27, 2022  
Comment on Draft Environmental Impact Report, Scripps Mercy Hospital Campus Project  
(Project No 658548; SCH No 2021040374)  
Page 2 of 2

Sincerely,



Amalia Bowley Fuentes  
LOZEAU DRURY LLP