



Via Email

January 6, 2023

Sara Osborn
 City of San Diego
 Development Services Department
 1222 First Avenue, MS 501
 San Diego, CA 92101
DSDEAS@SanDiego.gov

Re: Comment on Draft Environmental Impact Report, Towne Centre View
 (Project No. 624751; SCH No. 2021040044)

Dear Ms Osborn:

I am writing on behalf of **Supporters Alliance for Environmental Responsibility ("SAFER")** regarding the Draft Environmental Impact Report ("DEIR") prepared for the Towne Centre View Project (Project No. 624751; SCH No. 2021040044), including all actions related or referring to the proposed construction of an approximately one million square foot scientific research and development (R&D) campus that would include five two- to six-story buildings, a four-level podium parking structure, and a parking garage with six above grade levels and one partial below grade level, located north of the current terminus of Towne Centre Drive, generally between I-5 to the west and I-805 to the east

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).

Sincerely,

Victoria Yundt
 LOZEAU DRURY LLP

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D-1 This comment summarizes the Project description, states the Draft EIR fails as an informational document and does not impose all feasible mitigation measures, and requests that the City revise the Draft EIR and recirculate the Revised Draft EIR. The Project's Draft EIR was prepared in accordance with CEQA (California Public Resources Code (PRC), Section 21000 et seq.), the CEQA Guidelines (14 CCR 15000 et seq.), and the City's EIR Preparation Guidelines. With respect to the requirement for additional mitigation measures, based on the City's established thresholds of significance, the Draft EIR determined that the Project would result in no impact, a less than significant impact, or a less than significant impact with implementation of standard conditions of approval for each topic, except for transportation-related/vehicle miles traveled (VMT) impacts. VMT impacts were determined to be less than significant with implementation of the identified mitigation measure. Therefore, the Draft EIR determined that there would be no significant and unavoidable impacts resulting from the Project and no additional mitigation is required. No revisions to the Draft EIR are required.

This comment fails to provide any specific comments regarding the information and analysis presented in the Draft EIR to substantiate the inaccurate assertions about the adequacy of the Draft EIR; therefore, no response can be provided. There were no comments provided in this letter or in other comments received by the City of San Diego on the Draft EIR that necessitate recirculation of the Draft EIR, as set forth in Section 15088.5 of the State CEQA Guidelines.