Peninsula Community Planning Board
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Subject: Peninsula Community Planning Board Comments to the Midway Rising Subsequent Environmental Impact Report (SEIR)

Since the narrow approval of Measure C and selection of the Midway Rising Development Team, Midway Rising has not upheld its commitments to the public and voters. Midway Rising has reduced its commitment to middle income housing, along with parks and open spaces, and removed the Greenwood Street Extension. Additionally, the Midway Rising Project will environmentally impact and harm the community with increases in traffic congestion and noise. According to the SIER, the environmental impacts from traffic and noise are significant and remain unmitigated. The Midway Rising team has failed to implement traffic mitigation measures which are sustainable and identified in the 2018 Community Plan.

Mitigation Measures

The SEIR states the Project would result in vehicle miles traveled exceeding thresholds identified in City Traffic Standards for regionally serving commercial and entertainment land use and impacts would be significant. The proposed Mitigation Measures **MM Trans 5.2.1 Commercial Shuttle** and **MM Trans 5.2.2 Employee Transit Subsidy** are 10-year short term tokens which do not adequately address the current traffic congestion and are speculative. There is no assurance of their success or if they will be utilized by the public or employees as projected.

The new entertainment center will increase attendance from the current capacity of 10,500 spectators to 19,500. The Traffic Analysis estimates an increase of 839,145 Vehicle Miles Traveled per year for entertainment. During normal PM peak hours, the intersections and major Roadway segments are congested and operate at Level of Service E and F. The Future Estimated Utilization of the entertainment center (Appendix D2) assumes 158 events a year which translates to over 40 % of the year of unmitigated traffic congestion. The proposed traffic mitigation for entertainment use and events does not adequately address the unmitigated traffic impacts which are significant

Include Proposed Traffic Improvements in Table S-1. Summary of Significant Environmental Impacts.

To be consistent with the Midway Community Plan, SEIR pg. 5.2-19 states *The Project proposes modifications to the following intersections as identified and analyzed in the Community Plan Amendment Report and Community Plan Amendment Memorandum.*

- Midway Drive and Sports Arena Boulevard/West Point Loma Boulevard
- Kemper Street/Sports Arena Boulevard
- Hancock Street/Kurtz Street
- Kurtz Street/Camino Del Rio West
- Camino Del Rio West/Rosecrans Street and Sports Arena Boulevard

The PCPB requests that these improvements be included in **Table S-1 Summary of Significant Environmental Impacts** along with an implementation time frame to ensure these measures will be implemented prior to the Opening Phase 1 anticipated to occur in 2030.

SEIR Pg 5.2-17 also states *In addition, based on the recommendations contained in the LMA (Appendices D1 and D2), the Project would make the following intersection modifications to improve traffic operations (refer to Appendix U in Appendix D1 for additional details).* These improvements are identified in the LMA (Local Mobility Analysis), Table 7-1 and ES-10.

The PCPB requests that the stated improvements in the LMA and SEIR 5.2-17 and 18, be clearly identified and included in **Table S-1 Summary of Significant Environmental Impacts** along with an implementation time frame to ensure the stated measures will be implemented prior to Opening Phase 1.

Conflict with the Midway Pacific Highway Community Plan Update PEIR

The Draft Supplement EIR is in conflict with the approved Midway-Pacific Highway CPU PEIR and Community Plan Mobility Section 3.5 Street and Freeway Systems, Policy ME-5.4 and Policy ME-5.9.

ME 5.4 *Introduce new streets to break up the scale of existing superblocks to improve multimodal mobility and reduce vehicular congestion, including the new streets listed in Box 3-5.*
ME-5.9 Consider *a public road connection between Sports Arena Boulevard and Midway Drive to connect to the Greenwood Street extension in order to improve the mobility system.*

In order to meet future transportation demands, enhance circulation and improve mobility, the Community Plan recommends the extension of Greenwood Street from Kurtz Street and Sports Arena Blvd. The Midway-Pacific Highway CPU PEIR determined that development would result in significant impacts to roadway segments and intersections and identified mitigation measures that would enhance traffic circulation. The Midway-Pacific Highway CPU PEIR Impact TRANS 5.2-2 proposed the extension of Greenwood Street from Sports Arena Boulevard to Kurtz Street.

The proposed Greenwood Street extension has been omitted thru a proposed amendment to the Community Plan. Traffic mitigation measures associated with the elimination of TRANS 5.2-2 have not been addressed in the SEIR and remain unmitigated and significant.

SEIR Impacts Health and Safety

Interstates 1-5 and I-8 and project intersection and approaches are identified in the City and County Emergency Response Plans. These intersections and roadways as stated in the LMA traffic analysis are congested and operate at Service Levels of E and F with significant traffic delays. The SEIR falls to meet the **Significance Determination Thresholds under Issue 3: Emergency Plan Consistency.** *Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;* The Midway-Pacific Highway CPU PEIR concluded that the 2018 Community Plan improvements to the existing transportation infrastructure could improve evacuation times. The improvements have not been implemented nor identified in the mitigation measures. The SEIR fails to address and demonstrate that the proposed Midway Rising Project will not impair emergency response and the SEIR is inconsistent with the Health and Safety Measures under Issue 3; Emergency Plan Consistency.

The letter was unanimously approved with a vote of XXX

Sincerely,

Frederick W. Kosmo, Jr.
PCPB Chair

Cc: City of San Diego Planning Department