

Land Use and Housing Committee

Chair Kent Lee

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Re: Midway Rising Project — Transportation Mitigation, CEQA Findings, and Statement of Overriding Considerations

The Peninsula Community Planning Board (PCPB) submits this letter as a final effort to address the significant and long-term traffic congestion concerns associated with the Midway Rising Project. In light of Senate Bills 344 and 958, recently signed into law and co-sponsored by Mayor Gloria, the PCPB believes it is important that the City Council ensure that all feasible transportation mitigation measures are identified, adopted, and implemented.

The PCPB has previously expressed its concerns and opposition regarding the project and its environmental impacts, including in its letter dated September 17, 2026, and its letter to the Land Use and Housing Committee dated October 16, 2024.

On XX, the Land Use and Housing Committee and subsequently the City Council will be required to consider certification of the Final Subsequent Environmental Impact Report (SEIR), adoption of the Mitigation Monitoring and Reporting Program (MMRP), and adoption of the required Findings and Statement of Overriding Considerations.

The Peninsula Community Planning Board (PCPB) requests that, before taking these actions, the Committee carefully consider additional **feasible traffic mitigation measures** that must be adopted to reduce the project's significant transportation impacts and incorporate these measures as enforceable conditions of project approval.

CEQA and the Statement of Overriding Considerations

Under Public Resources Code section 21081 and CEQA Guidelines section 15091, the City must make findings regarding each significant environmental impact and determine whether mitigation measures or alternatives can avoid or substantially lessen those effects. Where significant impacts remain, the City must make the required findings concerning the feasibility of additional mitigation measures or alternatives.

Accordingly, the Committee/City Council must identify and adopt all feasible mitigation measures that could avoid or substantially lessen the project's significant transportation impacts.

The Final SEIR identifies transportation impacts that remain significant and unavoidable even after the mitigation measures currently proposed. Therefore, before concluding that these impacts are unavoidable, the City Council should determine whether additional feasible traffic measures can further reduce those impacts and, where appropriate, incorporate those measures as enforceable conditions of project approval.

The SEIR identifies the City Council as the decision-making body responsible for considering the project's impacts, mitigation measures, and alternatives. The PCPB therefore respectfully requests

that the Council exercise this responsibility fully before adopting the Statement of Overriding Considerations.

Requested Transportation Mitigation Measures

The PCPB requests that the following additional transportation measures be considered and, where feasible, incorporated into the final project approvals:

1. Make Transportation Mitigation Permanent
2. Establish an Enforceable Event Traffic Management Plan
3. Establish Post-Opening Traffic Monitoring and Measurable Performance Standards
4. Establish a Traffic-Mitigation Trigger Mechanism
5. Accelerate Identified Transit and Roadway Improvements
6. Expand Employee Transit Incentives
7. Require Adequate Remote Parking and Shuttle Capacity for Major Events
8. Require Mandatory Corrective Measures
9. Require Annual Public Reporting

These additional mitigation measures are identified in Exhibit A

Request to the Land Use and Housing Committee

The PCPB respectfully requests that the Land Use and Housing Committee address these additional transportation mitigation measures before final approval of the Midway Rising Project and adoption of the Statement of Overriding Considerations.

The PCPB further requests that the City establish a clear administrative record identifying:

1. Which additional feasible transportation measures were considered;
2. Why any identified measure was determined to be infeasible if it is rejected;
3. Which transportation mitigation measures will be incorporated as enforceable conditions of project approval.

This approach is consistent with CEQA's requirement that agencies make a reasonable and good-faith effort to avoid or substantially lessen significant environmental effects. It is also consistent with SB 344's emphasis on mitigation measures that are enforceable and subject to monitoring.

Conclusion

The PCPB remains concerned that the currently proposed transportation mitigation measures, even if fully implemented, will not adequately address the existing and anticipated traffic congestion associated with the Midway Rising development.

The PCPB therefore opposes the limited transportation mitigation currently proposed and believes substantially more can and should be done to address the traffic impacts of this billion-dollar development.

The Midway redevelopment represents a significant long-term investment in San Diego and will have lasting long term negative consequences for the surrounding communities. The PCPB believes the project, the City, and the surrounding neighborhoods will be better served with additional feasible migration measures and if transportation mitigation is treated not as a one-time CEQA exercise, but as an enforceable and measurable commitment throughout the life of the project.

The PCPB requests that the Land Use and Housing Committee and the City Council carefully consider the additional transportation measures identified in this letter before certifying the Final SEIR, adopting the Mitigation Monitoring and Reporting Program and Statement of Overriding Considerations, and granting final project approvals.

As required by CEQA, the City Council should ensure that all feasible transportation mitigation measures are identified, and adopted as enforceable conditions where appropriate. In addition, the traffic conditions should be monitored after project opening and strengthened when actual conditions demonstrate that additional measures are necessary.

The PCPB urges the Committee to take this final opportunity to establish meaningful, enforceable, and long-term protections for the surrounding communities and to address the significant transportation impacts of the Midway Rising Project.

Respectfully submitted,

PCPB