

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.

SEIR Impacts Not Addressed in Report

The SEIR has not addressed some additional adverse impacts that the project would have on the community, and therefore, no mitigation measures are identified to address them. These include the substantial increase in school attendance resulting from the 4,254 additional housing units the project would create, and whether or not the property tax increment resulting from the project would be shared with other local agencies (including schools) or retained within the project area.

School attendance. The project would create 4,254 housing units, 2,000 which would be designated affordable. Many of these households would have k-12 school age kids who would need to attend surrounding local schools thereby significantly increasing their attendance and possibly resulting in school overcrowding. The SEIR needs to estimate the increase of school age children resulting from these additional units and the mitigations measures that would be taken to address resulting school overcrowding.

Property tax increment allocation. Additional property tax revenues resulting from major developments such as Midway Rising are typically shared with other local agencies such as school districts, community colleges, the city, and county. This project would generate substantial additional property tax and sales tax revenues as it would provide 130,000 square feet of new commercial retail space. It is unclear whether the property tax increment revenue would be shared with these other local agencies or retained entirely within the project area to finance things such as debt service and future project improvements. This could have a substantial adverse impact on other local agencies and the report needs to identify the mitigation measures that would be taken if the property tax increment would be retained in the project area, particularly the impact on local schools who would have to service the additional K-12 school age population resulting from the additional housing units. This was an unresolved issue in previous public community outreach by the project promoters.

The letter was unanimously approved with a vote of XXX

Sincerely,



Frederick W. Kosmo, Jr.
PCPB Chair