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Land Use and Housing Committee

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**Subject: Peninsula Community Planning Board Request for Additional Traffic Improvements to Mitigate Traffic impacts From the Midway Rising Project, EIF District, and Phasing for the Affordable Housing Construction**

The multi-billion dollar project will transform the Midway District with a new 16,000 entertainment center, 130,000 square feet of commercial space, and 4,250 housing units. The Midway Rising project, as evaluated in the Draft SEIR poses serious environmental and community challenges that are not adequately resolved. The SEIR identifies at least four impact areas as significant and unmitigated, land use, transportation, historic resources, and noise. This means that even after all proposed mitigations, the project will cause lasting harm to the community in those areas. The Peninsula Community Planning Board is most concerned that the large volume of additional traffic created by the Project will remain unmitigated and add to the already congested roadways and lead to continuous gridlock.

**Traffic and Transportation Infrastructure Impacts**

The new entertainment center will increase attendance from the current capacity of 10,500 spectators to 16,000. Special events will accommodate 20,000 attendees combined with the outdoor space. The Traffic Analysis estimates an increase of 839,145 Vehicle Miles Traveled per year for entertainment. Proposed Commercial Development of 130,000 SF will generate over 94,084,949 VMT. These figures – hundreds of thousands of additional vehicle miles traveled– are staggering. The Sports Arena Blvd/Rosecrans corridor is already one of the most congested areas in the city, often gridlocked during peak hours or entertainment events. During normal PM peak hours, the intersections and major Roadway segments operate at Level of Service E and F. The Future Estimated Utilization of the entertainment center assumes 158 events a year which translates to over 40 % of the year of traffic congestion impacting the local community.

Adding this volume of traffic will exacerbate congestion, leading to longer idling times (hence more air pollution) and creating frustrating delays for residents, commuters and visitors. The EIR acknowledges a significant impact on transportation that cannot be fully mitigated, effectively asking the public to bear increased traffic and degraded circulation.

The proposed traffic mitigation for entertainment and commercial use does not adequately address the traffic impacts. The SEIR identifies mitigation measures such as a shuttle between the site and the Old Town Transit Center, and transit subsidies for arena employees. These measures are worthwhile (and should be required), but even according to the SEIR they do not reduce the impact to below significance in all cases. There is no evidence or documentation that supports these measures will be utilized as proposed and reduce traffic as projected. The shuttle may encourage transit but would not fully mitigate the commercial trip impact. The employee transit subsidy assumes that 50 percent of the entertainment center employees will use public transportation to work but there is no evidence or assurance that will occur.

The current residents and commuters in this area will bear the brunt of increased traffic congestion. The Council should insist on alternative and additional mitigation that would typically be expected from a multi-billion-dollar project for example;

- Additional shuttles in addition to the one committed. Extending the hours of operation beyond 10PM.
- A pedestrian/bike overpass bridge across Camino Del Rio West that could provide a safe and efficient link between the Old Town transit center and Midway Rising.
- Additional traffic signal upgrades.
- The extension of Greenwood Street as identified in the Community Plan from Sports Arena Blvd to Midway Dr.
- The continuous extension of Sports Arena Blvd to Pacific Hwy,
- Binding commitments to stagger arena event schedules to avoid peak traffic if possible.

Without additional mitigation measures, the Midway Rising project will irreversibly choke an already overburdened road network. Additionally, the Midway Rising project is projected to be built in multiple phases. It is imperative that traffic mitigation issues are implemented prior to or during Phase 1 of the project so as to ensure successful roll-out of the new arena and to help address the traffic congestion issues that will arise during construction of all phases of the project.

### **Enhanced Infrastructure Financing District**

The Peninsula Community Planning Board supports the creation of an Enhanced Infrastructure Financing District (EIFD) which has been proposed for the Midway Rising Development Project to provide for needed Traffic improvements to reduce congestion in the Midway District. Improvements include the on-off ramps identified in the 2018 Midway Community Plan, extension to the Trolley or People Mover into the Midway District, and other infrastructure improvements identified above.

### **Phasing of the Affordable Housing Construction**

The Specific Plan allows for up to 4,254 homes in the Midway Rising project and requires a minimum of 2,000 affordable homes be restricted at 80 percent area median income (AMI) or lower, in order to further the housing goals and policies of the General Plan and Community Plan. The fact that 47% (2000 affordable /4254 total housing = 47%) of the dwelling units are projected to be affordable in the

plan was a key factor in selection of Midway Rising as the developer the Sport Arena area. The Midway Rising is planned to be built in multiple phases.

Midway Rising is proposing a variance to the Inclusionary Affordable Housing Regulations San Diego Municipal Code (SDMC) Section 142.1311 (pdf pages 14-20 of [item-2-midway-rising-attachment-13-16.pdf](#)) that would allow for only 10% of the housing units built in any phase of the project be affordable, including the initial phase. The only reason provided for requesting this variance is based on a Keyser Marston and Associated study (2018) that noted when 10% of units in a multi-family project were deed-restricted at 65% AMI, it generated a moderate impact on the multi-family project's feasibility and if the ratio were increased to 15-20% it generated a high impact on the residual land value of the project. Thus, Midway Rising is claiming that if they had to set aside more than 10% of housing in any phase of residential development it would create a specific and financial hardship for providing more than 10% of housing as affordable in any market rate development phase

It needs to be noted that the Keyser-Marston study assumed that the affordable units in a project were rented at 65% AMI and not 80% AMI, as is the commitment in the Midway Rising project. Thus, we request that the Variance to the Inclusionary Affordable Housing Regulations San Diego Municipal Code (SDMC) Section 142.1311 be set at either 10% of the housing units in the Phase 1 are affordable to 65% AMI or lower or at least 20% of units are affordable at the 80% AMI or lower level. This would be more consistent with the objectives of the affordable housing initiative of California's Surplus Land. The housing crisis is immediate and needs to be addressed in the near term to meet San Diego's RHNA targets for the current housing cycle, not 10-15 years in the future.

In closing, we want to emphasize that we are not opposed to redeveloping the Midway area or to adding housing – indeed, we support smart growth and revitalization when done responsibly. However, Midway Rising as proposed and stated in the SEIR fails to adequately address traffic impacts and places an undue burden on the community and City. Growth must be managed, not done at any cost. San Diego has a chance to get this right by insisting on a project that truly integrates into the community and mitigates its impacts and addresses the acute housing affordability needs. The Peninsula Community Planning Board strongly urges the City Council to use its authority to require Midway Rising to take additional steps to mitigate traffic and to ensure that acute affordable housing needs are met.. If not now under this multi-billion dollar project, then when?

Sincerely,

Eric Law  
Peninsula Community Board Chair

cc- Land Use and Housing Committee  
Councilmember Jennifer Campbell