November 8th, 2026

Peninsula Community Planning Board
1220 Rosecrans Street PMB 549
San Diego, CA 92106
pcpbsd@gmail.com

San Diego City Council
202 C Street, 10th Floor
San Diego, CA 92101

Subj: Objection to Midway Rising Approval

Council President LaCava and Members of the Council,

The Peninsula Community Planning Board (PCPB) urges you to deny the Midway Rising approvals before you and to continue the items until the financial, infrastructure, and environmental questions are resolved. Please include this letter and our written objections in the administrative record.

San Diego needs affordable housing, but this deal does not deliver genuinely affordable homes on safe land, with adequate infrastructure and enforceable protections for the public. Our consultation with engineering, environmental, and development specialists has raised concerns requiring documented answers before the City commits public land and resources.

Affordable housing. Midway Rising was selected in part because they offered a blended affordability of 47.9% of area median income (AMI). The proposed Disposition and Development Agreement (DDA) permits an average of 60% AMI and changes affordable-unit phasing. This material change violates the strict affordability covenant of the Surplus Land Act and requires a new review. The Council should verify eligibility for federal low-income housing tax credits (LIHTC) and require detailed explanations of who can afford the homes, when they will be delivered, and how they will be financed.

Public cost. The proposed Enhanced Infrastructure Financing District (EIFD) will redirect ~$300 million in Point Loma property-tax revenue to the 49-acre development while leaving surrounding infrastructure upgrades unfunded. Our assessment estimates that ~$1 billion in upgrades are needed, including nearly $500 million for two interstate interchanges. This translates into unmerited tax increases on already overburdened San Diegans.

Infrastructure. Rosecrans Street should not be reduced from six general-traffic lanes to four with two dedicated bus lanes without adequately addressing congestion, access, and emergency response. Midway Rising's Local Mobility Analysis is grossly faulty, modelling the adjacent NAVWAR OTC redevelopment as 4,400 rather than 10,000 units. The Navy's Environmental Impact Statement (EIS) correct models the mobility impacts and warns that the Rosecrans St commute will increase from 45 to 90 minutes without transportation improvements.

Toxic soil contamination. The available borehole samples from the former landfill beneath the arena parcels identifies metals and chemicals reportedly reaching, in some cases, 30 times the applicable safety levels. These reported levels exceed residential safety standards and make the area unsuitable for habitation without extensive remediation. Serendipitously, the asphalt parking lot has capped the contaminated ground. Removing it could require substantial soil removal and replacement, with groundwater reportedly less than six feet below the surface. The risks involved are substantial and the scale could extend to removing hundreds of thousands of tons of soil.

Seismic instability. The site is the old San Diego River course and an alluvial salt marsh, 1/2 mile from the Rose Canyon Fault, at risk for liquefaction, and subject to significant soil settlement. Engineers assess that extremely complex site-specific engineering and costly soil stabilization is required to mitigate the unlaying hazards. The 250-foot building height amplifies the risk and compounds the problem of mitigation.

Flooding. Our review also identifies concerns about FEMA-designated floodplain areas, Army Corps of Engineers river levee certification, cyclic and increasing seawater and storm flooding, repeated breaks in increasingly fragile sewers, and multiple stormwater pump failures. The City should require a coordinated plan addressing river flooding, sea-level rise, groundwater, foundations, roads, and sewage systems.

Objection. We object to

- Using SB 344 and SB 958 to limit obviously needed environmental scrutiny;
- The certification of an incomplete Supplemental Environmental Impact Report;
- The inadequate CEQA review; and
- Adoption of related findings and the Statement of Overriding Considerations.

The PCPB has diligently advocated for common sense solutions to Midway Rising's substantial and unmitigated impacts on existing Point Loma residents. The mayor, council, and Midway Rising team have all ignored the surrounding communities despite years of repeated requests for consultation and collaboration.

Recommendations. The PCPB endorses redevelopment of the Midway District consistent with the Village Concept the 2018 Community Plan, featuring mixed commercial-residential with substantial incorporated parks and recreation. Development should adhere to the existing Coastal Height Overlay Zone, minimizing the need for deep foundations, reducing seismic exposure, and lowering costs. ***We remain very concerned about the substantial environmental risks to building workforce housing on a toxic landfill that is subject to the ever-increasing threat of flooding.***

Please deny Midway Rising approvals until a financially viable and safe development plan is made available.

Sincerely,

Eric Law, Chair

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