



February 15, 2018
Alyssa Muto
Deputy Director
City of San Diego Planning Department
1010 Second Avenue, Suite 1200, East Tower
San Diego, California 92101

**Subject: MIDWAY-PACIFIC HIGHWAY COMMUNITY PLAN UPDATE
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
SCH #2015111013**

Ms. Muto,

By action of the Peninsula Community Planning Board [PCPB], at its meeting of February 15, 2018, please accept this letter as our public comment in response to the Midway-Pacific Highway Community Plan Update [MPHCPU] Draft Program Environmental Impact Report [DPEIR].

We appreciate the opportunity to provide input on the environmental effects of a plan for a neighboring community whose development is vitally important to the future of our own. Moreover, we applaud the efforts of the Midway-Pacific Highway Community Planning Group, City Staff and consultants for bringing about the update of the MPHCPU. The plan update, the subject environmental impact report and the implementing funding and zoning actions all bring needed clarity of vision for the Midway area.

Our crafting of this response letter had two primary objectives. The first was to comment on the adequacy of environmental analysis and respond to potential effects of the MPHCPU within the Peninsula Community Plan area, acting in our capacity as the City's authorized advisory body. Secondly, and equally important, is that we sought to broaden the understanding of the effects of the MPHCPU by our constituent Peninsula residents through the process of disseminating and discussing the review and policy responses contained in this letter during open sessions at committee and PCPB meetings.

This letter comprises three parts. The first comments on significant impacts declared in the DPEIR for locations within the Peninsula Community Plan area and states our policy responses to those impacts. The second part presents questions or issues which came to light through our review. The third component is an administrative request that traffic modeling data output be made available to us, for major streets within the Peninsula Community Plan area.

SIGNIFICANT PENINSULA COMMUNITY AREA IMPACTS NOTED

Traffic at Intersections. The DPEIR identifies two significant traffic impact locations at intersections within the Peninsula Community Plan area, neither of which are proposed to be fully mitigated.

Lytton Street & Rosecrans Street (Impact 5.2-7) -- Full mitigation of the MPHCPU impact of increased traffic at this location would require addition of a second southbound left-turn lane from Lytton Street to eastbound Rosecrans Street, an additional westbound through movement lane on Rosecrans Street,

and implementation of right-turn overlap phases at all legs of the intersection. The DPEIR indicates that partial mitigation, comprising addition of a second southbound left-turn lane from Lytton Street to eastbound Rosecrans Street and implementation of the right-turn overlap phases at all legs of intersection, is proposed for implementation funding. The proposed mitigation measure [TRANS 5.2-7b] would reduce impacts at the intersection of Lytton Street and Rosecrans Street to LOS E in the AM peak hour and to LOS D in the PM peak hour, thereby reducing the impact in the PM peak hour to less than significant.

PCPB Review of This Impact: The PCPB does not question the calculation of this outcome.

PCPB Policy Response: The PCPB accepts the partial mitigation of the significant traffic impact at this intersection in lieu of the disruption which would result from the acquisition and construction required to add the additional through lanes on Rosecrans Street necessary to achieve full mitigation.

Nimitz Boulevard/Lowell Street and Rosecrans Street (Impact 5.2-15) -- Full mitigation of the MPHCU impact of increased traffic at this location would require widening the eastbound and westbound approaches of the intersection along Rosecrans Street to include a third through lane, and an additional left-turn lane from eastbound Rosecrans Street to northbound Nimitz Boulevard. This mitigation is not proposed for implementation.

PCPB Review of This Impact: The DPEIR fails to account for the City's *Nimitz & Rosecrans Roadway Improvement Project*, a presently funded and planned improvement at this intersection. The project is scheduled for construction beginning in the current FY 2018. It will partially widen the eastbound approach of Rosecrans Street and add an additional left turn lane from eastbound Rosecrans Street to northbound Nimitz Boulevard. The impact of the MPHCU should be recalculated to account for this reasonably anticipated new configuration.

PCPB Policy Response: The PCPB accepts the partial mitigation of the significant traffic impact in the form of the currently anticipated reconfiguration at this intersection, in lieu of the disruption which would result from the acquisition and construction required to add the additional through lanes on Rosecrans Street necessary to achieve full mitigation.

Arterial Traffic Noise. The DPEIR declares a significant impact would occur for ministerial projects exposed to vehicular traffic noise, in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours as shown in Figure 5.5-3 (Impact 5.5-3).

PCPB Review of this Impact: Figure 5.5-3 maps the impact noise contours only within the Midway-Pacific Highway Community Plan area. A reasonable inference of the figure, however, would indicate significant noise impacts on two residential neighborhoods within the Peninsula Community Plan area. These locations include residences fronting Rosecrans Street east of Lytton Street and multifamily residences fronting Midway Drive, immediately south of West Point Loma Boulevard. Because residential uses are more sensitive to noise impacts and because these locations are developed and more likely to improve under ministerial processes,

the significance of the impact on these locations is more critical than conveyed by the DPEIR in its current assessment. The DPEIR should be amended to reflect these impacts.

PCPB Policy Response: The PCPB would support a voluntary retrofit assistance program for the limited number of residential properties within the impacted frontage areas. Absent further knowledge of possible mitigation measures, the PCPB reserves judgement on this matter.

QUESTIONS AND CLARIFICATION MATTERS

In the process of reviewing the DPEIR, we noted the following matters, requiring response and further analysis.

I-5/I-8 Interchange Configuration -- Table 8-6 appears to indicate that the provision of the missing I-5/I-8 interchange movements contained in the "No Project" Alternative (being the current Midway Community Plan) would be carried forward into the proposed MPHCPU. It describes the missing movements as "eastbound-to-southbound and southbound-to-westbound connectors" [underline emphasis added].

PCPB Review of this Matter:

- The description should read "eastbound-to-northbound and southbound-to-westbound".
- Was the carry forward of these components, correctly encoded, included in the forecasting done in the Mobility Study and DPEIR traffic analysis?
- Is a proposal for funding of these connectors to be included as mitigation or included in the upcoming the financing plan?
- If it was modeled, and implementation was not assured by mitigation or the financing plan, would the future absence of these components have led to an understatement traffic impacts within the community?
- If the completion of these connectors is left unmitigated but identified as the responsibility of CalTrans, is the City of San Diego prepared to pursue design and funding in the ongoing presently ongoing I-5 freeway corridor study and subsequent Regional Transportation Plan funding cycles?

Zoning Capacity -- The proposed zoning map (Figure 3-5) indicates zoning designations for the MPHCPU. Critical among these are three particular areas which have broad possibilities for future development. These areas and their assigned proposed zoning can be generally described as SPAWAR [IP 2-1], the former Post Office [CO 3-1], and the Sports Arena [CC 3-6].

PCPB Review of this Matter:

- In Figure 3-5, the color assigned to the Post Office site does not appear to match the correlating color in the figure legend.
- Are the impacts generated by these sites, in terms of traffic generation and other similar scaled demands calculated on buildout of the total site acreage at the maximum capacity of the assigned zones, as a "worst case" analysis?
- If so, will the mitigation and finance plans similarly project maximum financial contributions from these sites?



Historic Resources -- The DPEIR contains no discussion of La Playa Trail in its Historical Resources sections.

PCPB Review of this Matter:

- The generally understood alignment of the La Playa trail was the Rosecrans corridor, between the north shore of San Diego Bay northeastward toward the Presidio and Mission San Diego de Alcalá. In the past, the trail route has been acknowledged by markers.

Bicycle Facilities -- The text on page 8-14 indicates that a Class I bikeway, "along the Bay-to-Bay canal alignment" as contained in the "No Project" Alternative (being the current Midway Community Plan) would be carried forward into the proposed MPHCPU.

PCPB Review of this Matter:

- Such an alignment does not appear to be shown on the DPEIR Figure 5.2-2 ["Existing and Planned Bicycle Network"].
- Is a proposal for funding of this ambitious alignment to be included as mitigation or included in the upcoming the financing plan?

ADMINISTRATIVE REQUEST FOR DATA OUTPUT

Apart from the discussion of the DPEIR itself, this letter specifically requests that the City of San Diego compile and produce for the PCPB a table or graphic depicting the output traffic projections in the Mobility Study and DPEIR traffic analysis for each General Plan-level arterial and major street segment within the Peninsula Community Plan area.

The City of San Diego has rightly invested a considerable amount of staff time and consultant funding to conceive mobility proposals and create traffic models as critical components in assembling the MPHCPU and the DPEIR. This effort provides a unique opportunity for the PCPB to gain a greater understanding of future traffic in the Peninsula Community Plan area. We see these output daily traffic projections as valid indicators based on some unique situational factors. We are adjacent to the subject planning area; we are down-peninsula, in a kind of cul-de-sac with little through traffic; and our zoning and plan designations have changed little over the years. We hope that you can provide us with the mapped or tabular data as requested.

We again thank you for this opportunity to comment and participate in the assessment of this valuable community plan update DPEIR. We look forward to the response to these comments and the fulfillment of our administrative request.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Linney", is written over the typed name.

Jon Linney
Chair

Peninsula Community Planning Board



CC: Hon. Lorie Zapf, City of San Diego Councilmember, District 2
Chair Cathy Kenton, Midway-Pacific Highway Community Planning Group
Tony Kempton, Advising Planner to the PCPB
Vicky White, Advising Planner to the MPHCPG