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**Subject: Peninsula Community Planning Board Comments to the Midway Rising Subsequent Environmental Impact Report (SEIR) PRJ-1106734**

Since the narrow approval of Measure C and selection of the Midway Rising Development Team, Midway Rising has not upheld its commitments to the public and voters. Midway Rising has reduced its commitment to middle income housing, along with parks and open spaces, and removed the Greenwood Street Extension. 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 in those areas. Additionally, we have concerns about affordability commitments, displacement, public service capacity, and other impacts that further question the project's net benefit to the local communities and the City.

CEQA's core policy, in Public Resources Code §21002, is that projects with significant environmental damage should not be approved if there are feasible alternatives or mitigation measures that can substantially lessen those impacts . In this case, it appears the City does have alternatives: for instance, alternative traffic mitigation measures, scaling down the project, or altering its mix of uses, could mitigate many impacts. Yet the Draft SEIR did not seize those options, presumably due to the developer's desired program. We urge the Council to put the community's interests first and not accept avoidable impacts for the sake of maximalist development.

**Traffic and Transportation Infrastructure Impacts**

According to the SIER, the environmental impacts from traffic and noise are significant and remain unmitigated. The Midway Rising team has failed to implement traffic mitigation measures which are sustainable and identified in the 2018 Community Plan.

The SEIR states the Project would result in vehicle miles traveled exceeding thresholds identified in City Traffic Standards for regionally serving commercial and entertainment land use and impacts would be significant. The proposed Mitigation Measures **MM Trans 5.2.1 Commercial Shuttle** and **MM Trans 5.2.2 Employee Transit Subsidy** are 10-year short term tokens which do not adequately address the current traffic congestion and are speculative. There is no assurance of their success or if they will be utilized by the public or employees as projected.

The new entertainment center will increase attendance from the current capacity of 10,500 spectators to 19,500. 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 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 (Appendix D2) assumes 158 events a year which translates to over 40 % of the year of unmitigated traffic congestion.

Adding this volume of traffic will exacerbate congestion, leading to longer idling times (hence more air pollution) and frustrating delays for residents in Midway, Point Loma, and Ocean Beach. 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 unmitigated 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 mitigate traffic. The shuttle may encourage transit but would not fully mitigate the commercial trip impact. The employee transit subsidy helps reduce some entertainment-related VMT, but only for a fraction of trips.

Under CEQA, a Statement of Overriding Considerations would be needed to justify unmitigated traffic impacts. Essentially claiming the project benefits outweigh the traffic problems. The current residents and commuters in this area will bear the brunt of increased congestion. The Council should insist on alternative and additional mitigation: for example, funding for transit infrastructure (more buses or shuttles beyond 10 years, etc.), pedestrian/bike overpass across Camino Del Rio West, additional traffic signal upgrades, binding commitments to stagger arena event schedules to avoid peak traffic if possible. Without such steps, the Midway Rising project could irreversibly choke an already overburdened road network.

Please address the following questions related to the Traffic Mitigation Proposed and the determination of the VMT:

What other Mitigation Measures were considered for offsetting excess VMT for commercial and entertainment events?

Provide justification and supporting documentation that supports excluding 100,000 sq. ft of proposed commercial land from the VMT calculation and provide evidence that 100,000 sq. ft. of commercial land use will be locally serving (pg. 5.2-28 and 5.2-29).

Provide justification and supporting documentation that supports a 10 percent reduction in VMT under commercial land use for trips that were already planned for a quality restaurant (pg. 5.2-29).

Provide justification and supporting documentation that the projected 805 employees will use public transit for 50 percent of all trips for work (employment) pg. 32 Midway Rising VMT Report Table “Entertainment Land Use Employment”.

Provide justification and supporting documentation that 20% of the public will utilize public transit to Concert Events as estimated per “Entertainment Center VMT” table pg. 31 Midway Rising VMT Report. The Padres and MTS report transit usage during high attendance games is 18 percent (8,000 attendees). The trolley stop to the new Entertainment Center is a 15–20-minute walk versus a 5-minute walk to Petco Park. The 20 percent Transit usage is overly optimistic, unjustifiable and underestimates the VMT projections.

**Include Proposed Traffic Improvements in Table S-1. Summary of Significant Environmental Impacts**.

To be consistent with the Midway Community Plan, SEIR pg. 5.2-19 states *The Project proposes modifications to the following intersections as identified and analyzed in the Community Plan Amendment Report and Community Plan Amendment Memorandum.*

- Midway Drive and Sports Arena Boulevard/West Point Loma Boulevard
- Kemper Street/Sports Arena Boulevard
- Hancock Street/Kurtz Street
- Kurtz Street/Camino Del Rio West
- Camino Del Rio West/Rosecrans Street and Sports Arena Boulevard

The PCPB requests that these improvements be included in **Table S-1 Summary of Significant Environmental Impacts** along with an implementation time frame to ensure these measures will be implemented prior to the Opening Phase 1 anticipated to occur in 2030.

SEIR Pg 5.2-17 also states *In addition, based on the recommendations contained in the LMA (Appendices D1 and D2), the Project would make the following intersection modifications to improve traffic operations (refer to Appendix U in Appendix D1 for additional details).* These improvements are identified in the LMA (Local Mobility Analysis), Table 7-1 and ES-10.

The PCPB requests that the stated improvements in the LMA and SEIR 5.2-17 and 18 be clearly identified and included in **Table S-1 Summary of Significant Environmental Impacts** along with an implementation time frame to ensure the stated measures will be implemented prior to Opening Phase 1.

**Conflict with the Midway Pacific Highway Community Plan Update PEIR**

The Draft Supplement EIR is in conflict with the approved Midway-Pacific Highway CPU PEIR and Community Plan Mobility Section 3.5 Street and Freeway Systems, Policy ME-5.4 and Policy ME-5.9.

**ME 5.4** *Introduce new streets to break up the scale of existing superblocks to improve multimodal mobility and reduce vehicular congestion, including the new streets listed in Box 3-5.*
**ME-5.9** Consider *a public road connection between Sports Arena Boulevard and Midway Drive to connect to the Greenwood Street extension in order to improve the mobility system.*

In order to meet future transportation demands, enhance circulation and improve mobility, the Community Plan recommends the extension of Greenwood Street from Kurtz Street and Sports Arena Blvd. The Midway-Pacific Highway CPU PEIR determined that development would result in significant impacts to roadway segments and intersections and identified mitigation measures that would enhance traffic circulation. The Midway-Pacific Highway CPU PEIR Impact TRANS 5.2-2 proposed the extension of Greenwood Street from Sports Arena Boulevard to Kurtz Street.

The proposed Greenwood Street extension has been omitted through a proposed amendment to the Community Plan. Traffic mitigation measures associated with the elimination of TRANS 5.2-2 have not been addressed in the SEIR and remain unmitigated and significant.

**Cumulative Traffic with Othe Projects**

CEQA requires evaluating cumulative impacts. The Midway area and adjacent neighborhoods have other developments either planned or foreseeable (for example, the NAVWAR redevelopment near Old Town, ongoing complete community projects in local neighborhoods). Each of these adds traffic to the regional network. The Draft SEIR should clearly lay out cumulative traffic scenarios – not just this project in isolation. The cumulative condition (Midway Rising + other growth) may reveal potential gridlock or the need for additional mitigation and major regional infrastructure upgrades (e.g., interchange improvements, transit capacity increases). If such an analysis is lacking or downplayed, the SEIR has not fully informed decision-makers and is insufficient.

**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.

**Site Contamination and Hazardous Materials**

The EIR acknowledges that the Sports Arena site is included on the state's list of hazardous waste sites pursuant to Gov. Code §65962.5 . This means there is known contamination on-site (possibly from prior uses or underground tanks). Yet the SEIR's discussion of remediation measures is insufficiently detailed. Removing the existing arena and digging for new construction will disturb hazardous materials, posing risks to soil, groundwater, and public health. The SEIR should explicitly detail a remediation plan under California regulations, with clear commitments to soil testing, safe removal and disposal of contaminants, and oversight by agencies. Without robust measures, construction could lead to toxic substances leaching or airborne dust endangering workers and nearby residents. We urge that the Final SEIR includes a comprehensive hazardous materials mitigation program, and that no grading or demolition occur until all contaminants are remediated to levels safe for residential use.

**Water Quality and Stormwater**

The project will dramatically increase structure area and hard surfaces (housing, arena, roads) on the 49- acre site. While some new parks are planned, a large portion will be impervious surfaces. Stormwater runoff could carry pollutants (oil, trash, chemicals) into the San Diego River or coastal waters if not properly managed. The Draft SEIR mentions a Preliminary Drainage Report and Storm Water Quality Plan (Appendices I1, I2) but offers few specifics in the main text. Given the proximity to sensitive coastal ecosystems, this is a serious concern. The EIR should analyze water quality impacts in depth and enforce Low Impact Development designs (per City Storm Water Standards) to ensure runoff is captured, treated, and does not degrade downstream water quality. If the SEIR lacks detailed modeling of runoff or fails to commit to specific stormwater infrastructure (bioswales, retention basins, etc.), it is deficient.

**Affordable Housing**

A selling point of Midway Rising is the inclusion of 2,000 affordable units (nearly half the total) for low-income households. This is indeed a commendable goal. According to reports, these units are intended for those earning 80% or less of area median income, with some as low as 30% AMI (including veterans' and supportive housing) . However, there are concerns about the viability and timing of this affordability promise. Recent City Council discussions indicate that Midway Rising removed planned moderate/middle-income units from the project last year, focusing only on low-income units, and that the project's finances are challenging. In fact, the City had to consider creating an Enhanced Infrastructure Financing District (EIFD) to subsidize infrastructure so the affordable housing can be delivered. This raises a question: if the project's feasibility is marginal, might the affordable units be delayed, reduced, or dependent on public funds? The Draft SEIR does not address this directly (as CEQA focuses on physical impacts, not economics), but it is a critical public policy issue. The SEIR should at least disclose the phasing: it states the development will be built in two phases over 10 years, with 875 units in Phase 1 and the rest in Phase 2. Will the affordable units be spread across phases or all in one phase? If Phase 2 is delayed or canceled due to market conditions, we could end up with the arena and market-rate units built, but not the full 2,000 affordable units – an outcome that would fail the project's promises. We urge that any project approval be conditioned on a binding affordable housing plan (e.g., no certificate of occupancy for market-rate units beyond a certain number until a proportional share of affordable units are constructed). Additionally, if public subsidy is needed (via an EIFD or otherwise), that should be considered transparently by policy-makers outside the EIR process.

Furthermore, the affordable units targeted at up to 80% AMI may not serve the extremely low-income segment (30% AMI and below) unless specifically committed. There is mention that some units will indeed be for 30% AMI and supportive housing , which is positive. The SEIR should ensure that the project's housing mix addresses a range of incomes to truly meet community needs. If all affordable units cluster at the upper limit of "low" (e.g., 60-80% AMI), those in deeper poverty may not benefit and could still be displaced. A robust Housing Plan, ideally in the project approval, should specify how many units at 30% AMI, 50% AMI, etc., will be provided, and with what financing. Otherwise, the "affordability" could be more nominal than actual for San Diego's most vulnerable populations.

**Risk of Displacment and Gentrification**

The Midway-Pacific Highway Community is home to many low-income and historically marginalized residents. According to SANDAG's "Community of Concern" mapping, this area is identified (the SEIR notes the site is in a "Community of Concern: Low" designation – implying some vulnerable population nearby). The introduction of a high-end mixed-use district with entertainment amenities could raise property values in the vicinity. Landlords around the project site may attempt to capitalize on rising demand, possibly leading to rent hikes in nearby apartment complexes or redevelopment of older properties. This process can displace long-time residents who cannot afford the new rents. The SEIR should acknowledge this potential socio-economic impact. Even if CEQA does not treat economic displacement as a direct environmental impact, it is certainly a community impact of concern. We urge the City to coordinate any anti-displacement measures (for example, rent assistance, anti-eviction programs, or inclusionary housing requirements on other parcels) to ensure the surrounding community benefits from Midway Rising rather than being forced out. The Sports Arena site also currently hosts commercial businesses (some retail, the swap meet, etc.). Redevelopment means those businesses will be removed. The SEIR should list what businesses or uses are being displaced and whether any relocation assistance or phase-out is being offered.

**Gentrification of Community Character:** Gentrification is not just about economics but also changes in the character and culture of a neighborhood. The Midway District has long been a gritty, utilitarian area – known for the historic arena, big-box stores, music venues, and independent businesses. A shiny new "Entertainment District" with upscale shops and housing could homogenize the area, perhaps pushing out unique local businesses in favor of national chains that can pay high rents. The SEIR's Land Use/Planning section should evaluate whether the project aligns with the community's vision. The Midway-Pacific Highway Community Plan (2018) no doubt envisioned improvement and new development, but likely with community input to avoid loss of local character. Has the SEIR addressed how Midway Rising will incorporate affordable commercial space for existing local businesses or nonprofits? If all the new commercial space (130,000 sq ft per project description ) goes to high-paying tenants, small businesses may vanish. A truly community-oriented redevelopment might include guarantees like a public market space for local vendors (akin to the existing swap meet tradition) or priority leasing for small businesses. We see little of that mentioned.

**Strain on Public Service and Infrastructure**

**Schools:** The Midway Rising project will introduce thousands of new residents, including families with children, into the Point Loma cluster of San Diego Unified School District. A Will-Serve letter from SDUSD (Appendix L3) indicates the site is within the Dewey Elementary boundary and the Point Loma High School cluster. Current enrollment vs. capacity data suggests some schools (Dewey Elem, Correia Middle, etc.) have capacity now (e.g., Dewey is ~64% utilized) . However, adding potentially over a thousand school-age children (which is plausible from ~4,000 units) could quickly use up that capacity. The SEIR likely concludes that payment of school impact fees (pursuant to Govt Code §65995) constitutes full mitigation (as state law dictates). But from a community standpoint, we must ask: will there be enough classrooms and teachers when this project is complete? If Dewey Elementary or Correia Middle need expansion or new facilities, those take time and money (fees may not fully cover a new school). We urge that the city and school district proactively plan for growth – possibly reserving a site for a future school or negotiating that some of the development impact fees be directed to capacity expansion in this cluster. The SEIR should not just do a perfunctory analysis; it should clearly state whether new school facilities will be needed. If the SEIR found the impact less than significant with fees, We worry this overlooks the real-world impact on quality of education if hundreds of new students enroll. The Council should verify with SDUSD that this project will not lead to overcrowded classrooms or busing students out of their community.

**Parks and Recreation:** The project does include new parks – about 8.1 acres of public parks and 6.4 acres of plazas/open space – which on paper sounds positive. If fully realized, those parks (e.g., the large central one called "The Green" and plazas like "The Square") will provide recreation space for residents. However, we must consider that eight acres of park for, say, 10,000 new residents (plus thousands of visitors) may still be insufficient relative to city park standards (which often aim for e.g., 2.8 acres per 1,000 residents in urban areas). The quality and accessibility of these parks matter too: are they truly public and available at all times, or are some just private amenities for residents? The EIR should clarify their ownership and maintenance. There is also the question of timing: will the parks be built in the first phase or last? We would not want a scenario where housing is occupied but promised parks are delayed. The strain on existing nearby parks (like Shoreline Park or OB parks) could be significant if on-site recreation lags. The Council should ensure that the development agreement specifies the timely delivery of parks. Moreover, ongoing maintenance funding should be secured (perhaps via a Maintenance Assessment District) so the new parks remain safe and clean for public use and do not burden the Parks & Rec Department's budget unduly.

**Police, Fire, and Emergency Services:** With 4,000 new units and a 16,000-seat arena, demands on police and fire services will grow. The SEIR includes letters from the San Diego Fire-Rescue Department and Police Department (Appendices L1 and L2) presumably stating they have reviewed the project. Typically, such letters identify if a new fire station is needed or if existing stations can handle the load. The nearest fire stations (e.g.,

Fire Station 20 on Kemper St in Midway, and Station 22 in Point Loma) will have significantly more territory to cover and more calls (fire, medical, etc.) with this project. If Station 20 is the primary responder, will its staffing and equipment suffice for mid-rise buildings and an arena (which brings mass gatherings with potential for large incidents)? The response times to high rise buildings can be longer if traffic is congested (catch-22: the project will worsen traffic that fire trucks have to get through, see our comments on Emergency Access). If the Fire Dept letter (Appx L1) requested any mitigation (like developer contributions to a new station or equipment), the SEIR should commit to that. Similarly for Police: the Western Division may need more officers to patrol the new neighborhood and handle arena events (crowd control, etc.). The SEIR likely says impacts are less than significant with standard conditions (as is often the case, citing that stations are adequate or that funding will come from general funds). We urge skepticism – public safety must keep pace. We suggest that the project fund a substation or storefront police station on-site for event days and community policing. If not, we risk slower responses or stretched resources in surrounding neighborhoods.

**Noise, Air Quality and Pollution Impacts**

**Construction Noise and Vibration:** A 10-year phased construction (with heavy construction in Phase 1 from ~2026 onward ) means a decade of noise for those who live or work nearby. Pile driving, if required for foundations, could create intense noise and vibrations. Even standard construction (trucks, concrete pours, machinery) from early morning into the evening, potentially six days a week, will be highly disruptive. The SEIR likely sets hours of construction and some noise attenuation measures (e.g., noise barriers, mufflers on equipment), but those offer limited relief. Residents in the area (e.g., those on Hancock St, or near Barnett Ave, etc.) could experience chronic noise, affecting their quality of life and health. Vibration could also damage older buildings (if there are any historic structures nearby, though primarily the historic asset on-site is the arena itself). The SEIR should have conducted a noise/vibration study (Appendix G1, G2 are noise reports). If predicted construction noise exceeds City thresholds, even temporarily, that should be disclosed as a significant impact. We ask that the City require sound walls to mitigate noise and strictly enforce any noise ordinances and perhaps require periodic respite (days of no heavy work) to give the community breaks. Additionally, advanced notice to residents of high-noise activities should be a condition.

**Operational Noise (Arena and Entertainment):** The new Entertainment Center (arena) will host concerts, sports, and outdoor events. The Draft EIR explicitly found that noise levels during special events in outdoor areas will exceed limits and are significant/unavoidable . This is alarming. It means even with mitigation (sound walls, restricted hours, etc.), the noise from, say, an outdoor concert or a large gathering in the plaza, will go beyond the City's noise standards and disturb the peace. Nearby neighborhoods like Point Loma or Midway residents could hear amplified music or crowd noise, especially at night. The fact that the SEIR concedes this impact is telling – it is essentially asking the City to override its own noise standards. We find that unacceptable. Why should existing communities suffer excessive noise so a developer can have outdoor concerts? At minimum, the City should impose strict noise controls: for example, no outdoor amplified events after 10 PM, maximum decibel limits at the property line, and a requirement for the arena operator to monitor and respond to noise complaints. If these specifics are not in the SEIR, they should be added as mitigation. Given the SEIR already says it is unavoidable, the Council should seriously consider if the project design could be altered (e.g., orienting stages differently, or enclosing noisy activities) to better contain noise. CEQA requires mitigation of significant noise impacts where feasible – just because it is inconvenient does not mean it should not be attempted or required mitigation.

**Hazardous Materials During Demolition:** A specific pollution concern is the demolition of the existing Sports Arena (built in the 1960s). As noted, it likely contains asbestos and lead-based paint (common in buildings of that era). The SEIR has an asbestos/lead survey (Appendix H4). Removal of these hazardous materials must be done by certified abatement contractors under controlled conditions. Any lapse could release asbestos fibers or lead dust into the air, poisoning workers or nearby residents. The SEIR should explicitly commit to following all OSHA and EPA regulations for demolition, including notification, wetting materials, and proper disposal in

hazmat landfills. This is non-negotiable for safety. Similarly, any contaminated soil that is excavated (Appendices H2, H3 Phase II assessments presumably found some petroleum or other contaminants) needs proper handling – trucking it out covered, etc. We mention this to emphasize that "pollution" is not just new emissions; it is also avoiding releasing old pollution trapped on site. The Final SEIR mitigation monitoring plan must include oversight of these activities.

**CEQA Compliance and EIR Process Deficiencies**

Beyond the topic-specific issues above, we have broader concerns about the completeness and transparency of the EIR process under CEQA. The purpose of CEQA is to foster informed decision-making and public participation. In this case, several aspects of the process and document raise red flags:

**Subsequent EIR / Tiering from Prior Plans:** The Draft EIR is described as a "Subsequent EIR" building on the 2018 Midway-Pacific Highway Community Plan Update SEIR . While tiering from a programmatic plan EIR can be efficient, it appears the analysis is limited to "changed circumstances" since 2018 . This approach risks overlooking impacts that maybe were not fully resolved in the 2018 plan EIR. A lot has changed since 2018: traffic patterns (due to ride-shares, pandemic shifts), climate imperatives, housing crisis context, etc. If the EIR only examines incremental differences, the baseline might be the already-significant impacts identified in 2018 plus this. We could end up with compounding impacts that are not properly examined in totality. We worry that the EIR's approach is too piecemeal. For a project of this significance (essentially the largest redevelopment in this area in decades), the City should ensure a full-scope analysis. If any impacts were deferred or not analyzed in detail because they were "already covered" in the prior EIR, the Final EIR needs to clearly justify that and confirm conditions have not worsened. Otherwise, the CEQA analysis might not fully inform the public of the project's real impact.

**Public Review Period and Accessibility:** The Draft EIR was released on March 24, 2025, with a public review period through May 8, 2025. This is the minimum 45-day review period. Given the size of the document (the Draft SEIR PDF is ~58,000 KB, hundreds of pages plus many technical appendices), 45 days is a tight timeline for the public to thoroughly digest and comment. We and others in the community have struggled to review thousands of pages in this time. We request that the City consider extending the public comment period, or at least ensure that late comments are also considered, due to the complexity of the project. Additionally, We hope the City made the SEIR easily accessible (it was on the CEQAnet site and presumably the City's site). Not all community members know how to navigate those systems. Robust outreach (e.g., public meetings summarizing the SEIR findings) would have been ideal. With inadequate outreach, that is a process shortfall that should be remedied by giving extra opportunity for input by the local community Planning Boards and future Council hearings.

**Responses to Comments and Final SEIR Expectations**: Under CEQA, the City must respond in writing to all substantive comments received during the Draft SEIR review (CEQA Guidelines §15088). We are submitting detailed comments expecting detailed responses. Specifically, each of the concerns raised in this letter should be addressed in the Final SEIR or staff report, with explanations or modifications. For example, if We pointed out that an alternative was not considered, the City should explain why it was rejected or consider it now; if We argue a mitigation is insufficient, the City should justify its approach or strengthen the mitigation. A cursory or dismissive response would not satisfy CEQA's requirements for good faith reasoned analysis. We trust the Council will also look for a thorough Final SEIR document and not recommend project approval until satisfied that the City has adequately responded to public input.

**Mitigation Monitoring and Reporting:** Should the project be approved, CEQA requires adoption of a Mitigation Monitoring and Reporting Program (MMRP) to ensure all mitigation measures are implemented. We want assurance that this program will be rigorous. Far too often mitigations in an EIR become forgotten conditions.

Here, mitigations might include things like shuttle service for 10 years, noise monitoring, etc. – these must not be allowed to lapse. The MMRP should assign responsibility (e.g., City monitoring staff, or third-party auditors funded by the developer) and clear performance criteria. For instance, if a mitigation says, "provide shuttle for 10 years," what happens after 10 years if traffic is worse than expected? Will it be renewed? Or if an employee transit subsidy has low uptake, is there a contingency to adjust? The SEIR should be seen as a living commitment, not just paperwork.

**Project Alternatives Consideration:** We touched on this earlier, but we want to emphasize: CEQA compels a real consideration of alternatives that reduce environmental harm . We feel the Draft SEIR's Alternatives Chapter may have been too limited. Likely it analyzed: (1) No Project (i.e., leave site as-is or build per existing plan), (2) the proposed project, and perhaps (3) one alternative like "No Arena (residential focus)" or "Reduced Intensity." However, given the multiple unavoidable impacts (traffic, noise, historic, land use) , there should be an alternative that addresses each to some degree. For example, a Reduced Height and Retained Arena Alternative could avoid historic impact and reduce visual impact (no new 165' arena, keep the old one refurbished), though maybe fewer housing units as a trade-off. Was such an option considered? If not, why? The CEQA Guidelines say to consider feasible alternatives even if they impede project objectives – the objective of a brand-new arena may have steamrolled other ideas. The City is allowed to prioritize objectives, but it must show it looked at alternatives objectively. If the Final SEIR ends up with the conclusion that "the chosen project is the only feasible way to meet objectives," We hope the record shows a genuine analysis, not a foregone conclusion. As a commenter, We assert that feasible alternatives do exist that could lessen impacts (for instance, build the housing and affordable units without a new arena – perhaps partner with the Sports Arena operator to refurbish the current arena, which would save money and history). The City should address why that or other alternatives will not work if that is their stance.

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 in the SEIR appears to overreach, placing an undue burden on the environment and community. 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 to the maximum extent feasible. The Draft SEIR shows many areas where this is not yet the case. We respectfully request the Council to use its authority to require a better, more sustainable plan.

The letter was unanimously approved by the Peninsula Community Planning Board.

Sincerely,

Eric Law
PCPB Chair

Cc: City of San Diego Planning Department
Midway Pacific Highway Community
Planning Group
Councilmember Jennifer Campbell
District 2