

Serra Mesa Planning Group

A Recognized San Diego City Planning Group - Serving the Citizens of Serra Mesa

Post Office Box 23315 San Diego, CA 92193
smpg@serramesa.org

June 26, 2016

RE: Serra Mesa Community Plan Amendment Street Connection
Project No 265605 Sch No. 2012011048

Seth Litchney
Senior Planner, City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Dear Mr. Litchney:

The Serra Mesa Planning Group (SMPG) discussed the Serra Mesa Community Plan Amendment Street Connection: Draft Programmatic Environmental Impact Report at our June 16, 2016 meeting and unanimously passed a motion to approve this letter. This letter is the result of a careful review of the PEIR and recognition of the permanence and far reaching impacts of a street connection. Please note that Civita was formerly called Quarry Falls; and City View Church, formerly First Assembly of God.

Listed below are specific questions and comments organized by topics with the appropriate PEIR page references in parentheses.

Not Mentioned in this PEIR:

- Emergency access exists from Civita to Serra Mesa via Kaplan Drive and can be seen on Google maps (search Kaplan Drive San Diego). (Pertinent to p. ES-5, p. 2-3, p. 5.2-31, p. 5.2-35, p. 5.2-36, p. 7-13, p. 9-5, p. 9-6)
- The completed emergency access and sidewalks at Kaplan Drive provides bicycle and pedestrian access and can be seen on Google maps (Search Kaplan Drive San Diego). (Pertinent to p. ES-5, p. 5.1-11, p. 5.2-31, p. 5.2-36, p. 9-5, p. 9-6, p. 9-7, p. 9-8)
- Two park designs (one with the street connection and one without the street connection) have gone through the design approval process and the Park Development Agreement requires construction of the park. If the street connection was approved, the street would run through the park dividing it in two. (Pertinent to p. ES-5, p. 2-3, p. 5.1-9 through 5.1-11, p. 5.3-13, p. 5.9-1, p. 5.9-4, p. 7-17, p. 8-1, p. 8-2, p. 9-9)
- There are 56 multifamily retirement units (considered sensitive receptors), visible from the street, located at the City View Church, across from the street connection. (Pertinent to ES-2, p. 1-1, p. 2-1, p. 2-3, p. 5.1-1, p. 5.3-13, p. 5.3-20, p. 5.3-22, p. 5.9-2, p. 5.9-10)
- What is the maximum grade of the street connection? Will the grade impact air pollution and noise? (Pertinent to p. 3-4, p. 5.2-36, p. 5.3-17, p. 5.3-21, p. 5.4-3, p. 9-9)

- There is a blind curve in front of City View Church, creating poor sight distance, which can't be corrected. Furthermore, vehicles travel downhill on Phyllis Place from the I-805 southbound off-ramp to beyond the church. Given the blind curve and downhill travel discuss how a safe transportation system will be created on Phyllis Place when the ADTs increase from 2,760 (existing) to 34,540 (long term).
- The developer, Sudberry Properties, has indicated he would fund the road connection if approved or if not approved, make improvements to Mission Center Road (described in the Final PEIR for the Quarry Falls Project, p. 11-5). Will this information be added? If not, provide an explanation for the exclusion. (Pertinent to p. 3-3, p. 3-4, p. 4-1, p. 5.1-10)
- Mission Valley Community Plan
 - The Sand and Gravel Re-use Development section (p. 56) states “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” This statement is consistent with the Serra Mesa Community Plan.
 - “Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed.” (p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.

There are inconsistencies within the Mission Valley Community Plan. Aren't amendments needed? Explain how it is acceptable to propose an amendment to the Serra Mesa Community Plan when the Mission Valley Community Plan contains contradictions. (Pertinent to p. ES-5, p. ES-6, p. 3-1, p. 3-3, p. 5.1-9, p. 5.1-10, p. 9-6, p. 9-8, p. 9-9)

- City View Church is located across from the street connection. Will a redesign of the church parking lot and driveways be needed? (Pertinent to p. 5.1-10, p. 9-9)
- The PEIR didn't contain a list of all the agencies, organizations, and/or individuals that were consulted in preparing the draft EIR. Will this information be included? If not, provide an explanation for the exclusion.

Will each of the above items be added to and discussed in the appropriate areas of the PEIR? If not, provide an explanation for the exclusion for each item. For the appropriate items, will the information be used in the analyses and studies? If not, provide an explanation for the exclusion.

Clarification Needed

It's stated that the “the future street connection would fulfill an additional Mission Valley Community Plan policy of providing access to developable and redevelopable parcels by providing access to the Civita site.” (p. ES-1) Access already exists via Mission Center Road and Mission Village Drive. Mission Center Road is a direct link connecting Murray Ridge Road in Serra Mesa to Friars Road in Mission Valley. (Pertinent to p. ES-1, p. ES-5, p. 3-1, Table 5.1-1 & 5.1-2, p. 5.1-11, p. 9-4, p. 9-8)

The site of the road connection at Phyllis Place does not appear graded or prepared for construction. (Pertinent to p. 1-1, p. 2-2, p. 4-1, p. 5.1-1, p. 5.2-33, p. 7-1)

The Final PEIR for the Quarry Falls Project, Figure 5.2-3, and the Quarry Falls Specific Plan, Figure 4-16 at <https://www.sandiego.gov/sites/default/files/legacy/planning/community/profiles/missionvalley/pdf/plans/quarryfallsspecificplan.pdf>, show a trail from Franklin Ridge Road to Phyllis Place without the street connection. The trail provided by the developer can be accessed by pedestrians and bikers and will provide connectivity to the LRT line. (Pertinent p. ES 5-6, p. 1-1, p. 2-3, p. 5.1-11, p. 5.2-6, p. 5.2-31, p. 5.2-37, p. 9-6, p. 9-8)

The Final PEIR for the Quarry Falls Project (p. 10-39) and the Traffic Impact Analysis (p. 1) indicate that the street connection will be a four lane major street. This description of the Franklin Ridge Road connection is not found in the PEIR. (Pertinent to p. 2-1, Chapter 3, and any other area discussing the connection)

What other means of reconciling the Serra Mesa and Mission Valley Community Plans have been attempted? (p. 3-3, p. 4-1)

Will each of the above items be added to and discussed in the appropriate areas of the PEIR? If not, provide an explanation for the exclusion of an item.

Questions Regarding the Scope of the PEIR

The EIR is titled as a programmatic EIR but referred to as a program EIR. Is there a difference? If not, which term should be used? (p. ES-1)

Why was the decision made to conduct a program EIR rather than a project EIR? Provide specific information for supporting this decision. (p. 1-2)

List and describe the other series of actions and projects that compose this PEIR or are anticipated. (p. 1-2)

It's been stated that "The City has not proposed to construct the road or received an application to construct the road. Therefore, it is not known when the proposed CPA would be implemented and the road would be constructed." Since there are many items that have not been studied in this PEIR, does this mean that another EIR will be conducted if the CPA is approved? What would be the environmental review and approval process for each of the projects in this program EIR? (p. 1-3, p. 4-1, p. 5.2-1, p. 5.3-22, p. 5.8-11)

"The current configuration of the street system in Mission Valley and surrounding area contributes to the congestion of arterial roadways and the regional freeway system. (p. ES-1) "Development of a road, if it were to occur, in the proposed CPA area might relieve congestion on local arterial streets and freeway segments, but the analysis to make that determination is not included in this PEIR." (p. 3-1)

- What are the local arterial streets and freeway segments?
- Why wasn't an analysis (i.e., traffic, air quality, noise, etc.) made of the local arterial streets and freeway segments?
- Define the criteria used to determine congestion.
- Since the on and off ramps of SR-163, I-15, and I-8 impact congestion should the studies and analyses include these areas? If not, provide an explanation for the exclusion.
- I-8 (eastbound and westbound) on and off-ramps are very close (approximately one mile) to the I-805 Murray Ridge on and off-ramps. Was a study conducted to determine the impacts of additional traffic on the I-8 as a result of the Franklin Ridge Road connection? If so, will that information be included? If not, provide an explanation for the exclusion.

Throughout this document reference is made that the road connection would relieve congestion. Will the phrase "relieve congestion" in every area of this document be removed or corrected to reflect that it "might relieve congestion in Mission Valley"? (p. ES-1, p. 3-1, p. 5.1-16, p. 5.1-19, p. 5.1-20, p. 5.2-32, p. 5.2-35, p. 5.2-36, 5.2-37, p. 7-11, p. 7-13)

It's stated that "potential short-term impacts were not analyzed." If this CPA is approved, would it authorize the construction of the street connection? If yes, why wouldn't all of the impacts be analyzed? (p. 5.3-22)

“Where circumstances and regulatory requirements have changed, potential new impacts have been addressed in this PEIR.” Does the PEIR include the impacts from the previous Final PEIR for the Quarry Falls Project EIR? If yes, is the source referenced throughout the PEIR? (p. 3-3, p. 4-1)

What is considered a primary and secondary effect? Describe the criteria used to determine a primary and secondary effect. (p. 3-4, p. 5.1-9, p. 5.1-10, p. 5.2-1, p. 8-1)

Can a grading map for the street connection (e.g., similar to Figure 3-40, Final PEIR for the Quarry Falls Project) be included? If not, provide an explanation for the exclusion.

Discuss the grade of the street connection as it pertains to ADA requirements.

Table ES-1 is missing. Will it be added? If not, provide an explanation. (p. ES-3, p. 8-1)

There’s a high-pressure gas line that needs moving. Will this be included and discussed? If not, provide an explanation for the exclusion. (p. 5.7-2, p. 5.7-15)

Does the in-ground fiber optic cable need to be moved? Will this be included and discussed? If not, provide an explanation for the exclusion. (p. 5.7-2, p. 5.7-15)

Why wasn’t SDG&E included on the distribution list for the NOP and the PEIR?

Can a map showing the SDG&E easement be included? If not, provide an explanation for the exclusion.

Reference is made to goals. The project objectives are described but there isn’t a description of project goals. Are they the same? (p. ES-6, p. 9-6)

Listed below are specific questions and comments organized in the same order of the PEIR with the appropriate PEIR page references in parentheses.

Objectives

The General Plan and Community Plan Amendment Manual states that “To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.” City Council Resolution 304297 directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

Why weren’t these objectives, as directed by the City Council, used in the studies and analyses? Will the above information be added to the appropriate sections of the PEIR? If not, provide an explanation for the exclusion.

The following objectives weren’t listed in City Council Resolution 304297. (p. ES-2, p. 3-1, p. 3-2, p 9-2)

- Improve the overall circulation network in the Serra Mesa and Mission Valley planning areas
- Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas
- Allow for safe travel conditions for motorists, cyclists, and pedestrians along the street connection

- Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.

What is the source for the objectives not stated in the resolution? Will the source for the objectives be added? If the source isn't added, provide an explanation for the exclusion.

“The City Council directed staff to analyze the street connection and to evaluate whether this proposed connection of the street system to the arterial streets and freeways would result in less congestion and improved circulation...” (p. ES-1) City Council Resolution 304297 doesn't make this statement. What is the source for the above statement?

Multiple references to objectives and goals numbers and those numbers don't correlate to written objectives:

- “This alternative would meet two of the six objectives of the project as listed in Section 3.1.2 of this PEIR.” (p. ES-5, p. 9-8) The list of project objectives show three bullets (p. 3-2). Provide clarification that there are six objectives. For all of the areas that indicate there are two objectives met, indicate the two objectives that are met.
- “This alternative would not meet the first three project objectives of the project, but would meet the last two project objectives.” (p. 9.7) What are those two project objectives?

NOP and Scoping Meeting (p. 1-3)

The General Plan and Community Plan Amendment Manual, Appendix D, List of Possible Issues, states “Note: this list includes issues that have been previously analyzed in plan amendments, however any issue identified by staff, the public, or a decision maker should be analyzed as well.” Why weren't the following items, excerpted and quoted, from letters that were submitted by the community mentioned, discussed and/or studied in the PEIR?

Project Description: “Since there will be emergency access at Kaplan Drive and pedestrian and bicycle access whether or not the road connection is built, how will a study be conducted? What will be the criteria for analyzing and evaluating improvement?”

Aesthetics: “Substantially degrade the existing visual character or quality of the site and its surroundings? This has been marked as Less Than Significant Impact. Without the road connection there would be a contiguous park. How would a “four lane major artery” with its traffic and noise not have a significant impact on the visual character and quality of the site and its surroundings?”

Air Quality: “What is the grade for the road connection?” “Will it impact the Senior Housing located at San Diego First Assembly?” “What is the anticipated amount of time for queuing during peak traffic times?” “How much pollution is expected during this time?”

Biological Resources: “A road connection would transverse the planned park. If additional land is going to be provided to replace the area that is intersected, will it be in a biological sensitive area? If yes, will it have a significant impact and will mitigation be needed?”

Hazards and Hazardous Wastes:

“The discussion mentions Faith Community School but it doesn't mention the Senior Housing at San Diego First Assembly. What would be the potential health risks for the Senior Housing which is not separated by a buffer and includes a vulnerable population?”

“The discussion doesn’t mention the emergency connection at Kaplan Drive that is included in the Civita Development. What benefits and impacts will the Kaplan Drive emergency connection provide? If the road connection were not there, how much extra time is needed to access this connection?”

Land Use and Planning: “The discussion indicates that a road connection would require an amendment to the Serra Mesa Community Plan. If there is no road connection, what would be the impact on the Mission Valley Community Plan?”

Public Services:

“The discussion doesn’t include the Kaplan Drive emergency connection. What benefits and impact will the Kaplan Drive emergency connection provide?”

“The discussion indicates that the road connection would bisect the linear park at Phyllis Place and additional grading is required to expand the park area to address the loss.

- Where would this grading occur?
- Would this make-up area be comparable to the quality of the area that is bisected?
- Will the park be in two areas – one on each side of the road connection?
- If the park is on both sides of the road connection, what are the impacts of it being bisected?
- Are there safety issues?”

Land Use

According to the Significance Determination Thresholds land use compatibility impacts may be significant if the project would result in “Development or conversion of general plan or community plan designated open space...” Will the Franklin Ridge Road connection traverse through open space? Or will the additional space that’s needed for the park if it’s split in two require open space land? If affirmative, discuss the significant impact on land use.

What criteria was used to determine the project’s consistency with the City of San Diego 2008 General Plan (refer to Table 5.1-1)?

Listed below are the comments to Table 5.1-1, Proposed Project’s Consistency with the City of San Diego 2008 General Plan. The list identifies the items and the appropriate section of the General Plan. Will each of these items be included in the table? Will questions be answered and explanations provided? If not, provide an explanation for the exclusion of an item.

- The Mission Valley Community Plan is inconsistent with the Serra Mesa Community Plan. (C. Community Planning Goal V; Policy LU-D.12)
- The Mission Valley Community Plan in the Sand and Gravel Re-use Development section (p. 56) states “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” The plan contains inconsistencies. Why isn’t this statement mentioned? Why isn’t it discussed that a solution to the inconsistencies between the two plans and within the Mission Valley Community Plan can be solved by amending the Mission Valley Community Plan to exclude the street connection? (Policy LU-C.1.c; Policy LU-D.3; Policy LU-D.12)

- “Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed.” (Mission Valley Community Plan, p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan. (Policy LU-C.1.c; Policy LU-D.3; Policy LU-D.12)
- Mission Center Road is a direct connection from Murray Ridge Road in Serra Mesa to Friars in Mission Valley. (Policy LU-C.2.f; D. Plan Amendment Process Goal 1; Environmental Justice Goal 1; Policy LU-I.11; C. Street and Freeway System Goal I; Policy UD-A.2; B. Distinctive Neighborhoods and Residential Design Goal VI; Policy UD-B.5; Policy UD-C.6)
- Two linkages from Serra Mesa to Mission Valley exist – Mission Center Road and Mission Village Drive. (C. Street and Freeway System Goal II)
- The traffic studies describe an increase in traffic congestion in Serra Mesa. (Policy LU-C.5.c; C. Street and Freeway System Goal III; Policy ME-C.1; C. Street and Freeway System Goal I) Explain how the increase in traffic congestion meets the goal of “Vehicle congestion relief”. (C Street and Freeway System Goal III)
- The primary purpose for the street connection, a collector road, is access to I-805. Provide an explanation for how this meets ME-C.3 regarding “choice of routes to neighborhood destinations” and “designed to control traffic volumes”.
- The developer will provide a trail connection between Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Policy LU-H.6; A. Walkable Community Goal II; A. Walkable Community Goal III; A. Walkable Community Goal IV; A. Walkable Community Goal IV; Policy ME-A.6; C. Street and Freeway System Goal I; E. Transportation Demand Management Goal III; F. Bicycling Goal I; F. Bicycling Goal II; F. Bicycling Goal III; Policy UD-A.2; B. Distinctive Neighborhoods and Residential Design Goal VI; Policy UD-B.5; Policy UD-C.6; Policy UD-C.7)
- Emergency access via Kaplan Drive in Serra Mesa which is located adjacent to Civita housing exists. Why wasn’t this considered in the PEIR? (C. Street and Freeway System Goal I)
- The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access. Why wasn’t this considered in the PEIR? (Policy LU-H.6; A. Walkable Community Goal II; A. Walkable Community Goal III; A. Walkable Community Goal IV; A. Walkable Community Goal IV; Policy ME-A.6; C. Street and Freeway System Goal I; E. Transportation Demand Management Goal III; F. Bicycling Goal I; F. Bicycling Goal II; F. Bicycling Goal III; Policy UD-A.2; B. Distinctive Neighborhoods and Residential Design Goal VI; Policy UD-B.5; Policy UD-C.6; Policy UD-C.7; I)
- Two park designs (one with the street connection and one without the street connection) for Phyllis Place Park have gone through the design approval process and the Park Development Agreement requires construction of the park.
 - Splitting a park into two with a street connection could create a safety issue. Why wasn’t this discussed as an impact? (A. Walkable Community Goal II)
 - Splitting a park into two with a street connection will impact the park aesthetically. Why wasn’t this discussed as an impact? (Policy UD-C.7)
- Avoid closed-loop subdivisions and extensive cul-de-sac systems, except where the street layout is dictated by the topography or the need to avoid sensitive environmental resources. (UD-B.5) The Abbotshill area is a closed loop and Phyllis Place is the only egress and ingress. Discuss how this complies with the general plan.
- What is the maximum grade and length of the street connection?

- Will this grade impact “grading plans to provide convenient and accessible pedestrian connections”? (Policy ME-A.6)
- Is this grade superior for emergency access compared to Kaplan Drive? (Street Design Manual)
- What are the impacts of this grade on ADA requirements? (Street Design Manual)
- Is this grade suitable for mass transportation? (Street Design Manual)
- Discuss traffic waiting times and if stopping and starting on such a grade is feasible for mass transportation? (CE-31-32; LU-I.14)
- Discuss the grade of the street connection and the impact a street connection will have on the divided Phyllis Place Park (Policy UD-B.5)
- Would a trail accessible to bikers be safer than the Class II bike lanes on the Franklin Ridge Road connection? (F. Bicycling Goal II)
- The street connection is not a transportation improvement for the existing Serra Mesa development adjacent to the Civita development. It would not provide improved access times to increase or provide benefit for the walking community. (Policy ME-K.4)
- Explain how the proposed project would maximize the public viewshed of Mission Valley, as seen from Serra Mesa when the approved Phyllis Place Park will be constructed. (Policy UD-C.6)
- Explain how the street connection would improve circulation when the traffic studies indicate more congestion in Serra Mesa. (Policy UD-C.7)
- Explain how the street connection, which would increase ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place would meet the goal of “Minimal excessive motor vehicle noise on residential and other noise-sensitive land uses.” Also, it’s stated that the “City can, however, influence daily traffic volumes and reduce peak-hour traffic by promoting alternative transportation modes.” (Noise Element)
- Describe the high-quality transit services that would become more readily/easily available to those living in the community of Serra Mesa. Bus service is available on Murray Ridge Road and trolley access is available via Mission Center Road. The majority of Serra Mesa residents live closer to Mission Center Road, so driving further to Phyllis Place would be less convenient. (Proposed Project column for Policy LU-I.11)
- The Street Design Manual contains guidelines for street design. The streets described in this manual don’t seem to fit the street connection – number of lanes, ADTs, and grade. Discuss how the design will meet the Street Design Manual guidelines. If the street won’t meet the guidelines, discuss the required deviations. Note: Deviations for this street connection are mentioned in City Council Resolution 304295.
- The Mobility Element of the General Plan discusses street design. Discuss the pedestrian barrier to the segmented park that the four lane street will create. (ME-C.3)
- These statements are extracted from the Mobility Element: Design roadways and road improvements to enhance and maintain neighborhood character; Avoid or minimize disturbances to natural landforms; Emphasize aesthetics and noise reduction in the design, improvement, and operation of streets and highways. Discuss the street connection in relation to the above policies. (ME-C.6)

- A goal of the Transportation Demand Management section in the Mobility Element is “Improved performance and efficiency of the street and freeway system, by means other than roadway widening or construction.” Discuss the reasons for supporting construction of a street rather than working on improving performance and efficiency of the existing Mission Valley streets and SR-163.
- Final PEIR for the Quarry Falls Project, Statement of Overriding Considerations (p. 109) – “Quarry Falls is consistent with the General Plan which implements the City of Villages Strategy of focusing growth into pedestrian friendly mixed-use activity centers with connections to the regional transit system.” The emphasis in Civita has been on walkability. How does a street connection increasing traffic on local streets in Civita fit the City of Villages Strategy?

Listed below are the comments to Table 5.1-2, Proposed Project’s Consistency with the Serra Mesa Community Plan. Will each of these items be included in the table? If not, provide an explanation for the exclusion of an item.

- Retain the residential character of Serra Mesa. A street connection which will increase the ADTs from 2,420 (existing) to 34,540 (long term) impacts the residential character. (Plan Elements – Overriding Community goals)
- Splitting a park into two with a street connection will impact the landscape and hillside. (Proposal Street and Highways)
- Emergency access via Kaplan Drive in Serra Mesa which is located adjacent to Civita housing exists. (Proposal – Fire Protection; Environmental Management Element Goal)
- The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access. (Proposal – Bicycle Routes; Parks & Recreation Element Goals)
- The developer will provide a trail connection between Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Proposal – Bicycles Routes; Parks & Recreation Element Goals)
- “To provide a safe, balanced, efficient transportation system with minimal adverse environmental effects.” The street connection will adversely impact the environment. (Transportation Element – Goals)
- Phyllis Place Road is required to be widened. This conflicts with “Street widening and other improvements should be minimized...”. (Transportation Element – Proposals Streets and Highways, p. 41 of SMCP)
- Two park designs (one with the street connection and one without the street connection) for Phyllis Place Park have gone through the design approval process and the Park Development Agreement requires construction of the park.
 - Splitting a park into two with a street connection could create a safety issue. (Objective – Physical Environment-Urban Design)
 - Splitting a park into two with a street connection will impact the park aesthetically. (Objective – Physical Environment-Urban Design)
- Explain how the street connection running through a park can create a sense of place. (Proposal – Physical Environment – Urban Design)
- Will the Franklin Ridge Road connection traverse through open space? Or will the additional space that’s needed for the park if it’s split in two require open space land? If affirmative, explain how this would meet the goal that “Open space should be preserved.” (Environmental Management Element)

- The Serra Mesa Community Plan, page 47, Objective, states “To designate Multiple Species Conservation areas, canyons and hillside for preservation as open space and for strictly controlled utilization for the enjoyment of this generation and in perpetuity.” Also, page 48, states “Steep hillsides and canyons should be protected and preserved in a natural state. Where development is permitted, very low-density urbanization should occur. Natural features should be enhanced and areas of high scenic value and environmental sensitivity conserved. This proposal can be implemented with steep hillside guidelines, open space zones and PRD which is in character with the surrounding neighborhood.” Explain how a street connection meets the objective and proposal of the plan.

Transportation/Circulation and Parking

Data

Existing (2012) Conditions (p. 5.2-4)

- Why was the baseline data to determine traffic impacts used from January 23, 2012 rather than current conditions?
- Since 2012 there have been over 1,600 housing units built at Civita. Was an analysis made to confirm that the existing conditions in 2016 are still the same as in 2012?
- How does this data compare to what was predicted for the Quarry Falls Project, Phase 1?

Existing Traffic Volumes (p. 5.2-9) – Traffic studies were conducted in 2011 and 2013 by two different companies and an analysis by a third company.

- Were the traffic studies in 2011 and 2013 conducted when school was in session?
- Were they conducted on the same period of time of the day and the same day of the week?
- The traffic studies were conducted at least 3 years ago. In the last 4 years there have been over 1,600 housing units built at Civita. Does this impact the data for the existing traffic volumes?
- Why was a manual method for traffic volume count selected?
- Why weren't other methods selected, e.g., automatic method which could provide 24 hours of the day and all days of the week recording at multiple locations? Would this type of study provide better data for long term projections?

If there is inconsistency in the study conditions between the two sets of studies, is the data valid? If yes, provide an explanation for validity. If no, will the study be redone? (p. 5.2-9)

Why wasn't the intersection of Mission Center Road and Sevan (located in Serra Mesa) included in the traffic study? This intersection is the entrance into the Hye Park condominium complex, which includes no protected left turns from Sevan Court to Mission Center and no protected left turns from Mission Center to Sevan Court. There is no traffic signal at this intersection for turning during peak traffic hours. Will this intersection and the traffic impacts be studied and added to the traffic analysis? If not, provide an explanation for the exclusion. (p. 5.2-2)

“Appendix B includes existing traffic count data and also shows comparison tables between the 2011 counts and the 2013 counts that verified the validity of the counts.” Where are the tables located? If they're missing, will they be included? If not, provide an explanation. (Appendix C, p. 11)

The metered freeway off-ramps weren't analyzed in the traffic study. Provide an explanation for their exclusion. (p. 5.2-4)

Sandrock Road became a two lane collector with continuous center lane in 2014. Do the existing conditions account for the change of Sandrock from four to two lanes? (p. 5.2-8)

Broadstone Corsair, a 360 unit multifamily housing project, located at the corner of Aero and Sandrock, opened in 2015. Was the traffic from this project factored into existing and long term conditions? If not, will the analysis be revised? If it won't be revised, provide an explanation for the exclusion. (p. 5.2-8)

Civita has constructed over 1,600 units. Was an assessment or survey made of the traffic patterns and activity of residents within Civita? If yes, what were the results? If not, provide an explanation for the exclusion. (p. 5.2-8)

The Aquatera Drive to Murray Ridge Road segment of Mission Center Road is listed as a 2-lane Collector with no fronting property. Hye Park is a 103 unit condominium complex facing Mission Center Road at Sevan Court between Aquatera and Murray Ridge. Will the information on the table and everywhere else be corrected? If not, provide an explanation for the exclusion. (p. 5.2-11)

Long Term Conditions (p. 5.2-15) – When the analysis is made for the long-term conditions did it use the existing conditions as a basis or did it include the recommended mitigations?

Table 5.2-9, Approved or Pending Projects (p. 5.2-16) – Is this table up-to-date as of April 2016? There are a lot of projects listed in the Mission Valley Community Plan Update Project on page 7, https://www.sandiego.gov/sites/default/files/2_land_use_and_development.pdf, that aren't on this list. Will the table be changed to reflect updated information or added projects, appropriate studies and analyses? If not, provide an explanation for the exclusion.

Future Roadway Network (p. 5.2-16) – Phase 1 of SR-163 and Friars Road Interchange Project is scheduled for construction in fall 2016. SR-163 provides access to I-805 and is promoted on the City's website as "This project will alleviate some of the severe traffic delays along Friars Road due to new development in Mission Valley." Will this information be added and studied? If not, provide an explanation for why SR-163 with the improvements wasn't studied or discussed.

Future Roadway Network (p. 5.2-17) – There isn't a description of the Franklin Ridge Road connection. However, the Traffic Impact Study, p. 1, states "...includes a Site Development Permit (SDP) to construct this roadway connection as a four lane major street."

- Will this information be added to the description? If not, provide an explanation for the exclusion.
- Franklin Ridge Road is two lanes from Civita Boulevard to Via Alta. When the studies were conducted was the analysis of the street connection based on two-lane or four-lanes? If two lanes, will the study be updated to reflect four lanes?
- Reference to SDP conflicts with the PEIR statements indicating a SDP isn't included. Will this information be updated?

Is there ADT data showing long term effects without the connection for each intersection? Will it be included? If not, provide an explanation for the exclusion? (p. 5.2-21)

Is there an analysis of long term effects without the connection (see Table 5.2-10)? Will it be included? If not, provide an explanation for the exclusion? (p. 5.2-18)

Do the delays at the I-805 NB and SB ramps (PM) mean there will be queuing that will extend into the residential streets? Will queuing be discussed? If not, provide an explanation for the exclusion? (p. 5.2-25)

For Long-Term with the Connection the I-805 NB ramp at Murray Ridge Road indicates 43 minutes of delay (PM) and the I-805 SB ramp at Murray Ridge Road indicates 31 minutes of delay (PM). Currently, in the PM there is a bigger delay at the SB ramp rather than the NB ramp. Provide an explanation. (p. 5.2-25)

When the data was collected for the traffic study did it consider the activities of City View Church? If not, will it be included? If no, provide an explanation for the exclusion. (p. 5.2-1)

Was the school on Via Alta considered in the studies and analyses? Children will be crossing the street with close to 35,000 cars per day. What will be the impacts? How will impacts be avoided?

A dog park is planned for the intersection of Franklin and Via Alta. Will it be a safe place to walk dogs and cross the street with close to 35,000 cars a day?

Table 5.2-15 is missing. Will it be added? If not, provide an explanation for the exclusion. (p. 5.2-19)

Table 5.2-4, the “Delay” column indicates “(sec)”. Shouldn’t the label be “(min)”? If so, will the correction be made? If not, provide an explanation for the exclusion. (p. 5.2-9)

Table 5.2-10, the “Delay” column indicates “(sec)”. Shouldn’t the label be “(min)”? If so, will the correction be made? If not, provide an explanation for the exclusion. (p. 5.2-18)

“Table 5.3-6 summarizes the existing traffic conditions, long-term cumulative traffic conditions without the roadway connection, long-term cumulative traffic conditions with the roadway connection...” (p. 5.3-22)
Table 5.3-6 lacks long-term cumulative without the roadway connection data. (p. 5.3-6) Will the table be updated with this information? If not, provide an explanation for the exclusion.

Appendix C

- Reference to Table 5-4 on page 37 states “without connection”; title on Table 5-4 on page 43 states “with connection”. Will the table be corrected? If not, provide an explanation.
- Table 5-2, page 40, under the heading “With Mitigation” column, should the “ Δ Delay” column be labeled “Delay”? Also, the table is lacking the label “min”.

Questions/Clarification

Reference is made to “new development.” In the area of the street connection Serra Mesa is built-out. What is meant by new development? (p. 2-7)

The statement is made “...Phyllis Place will be reconfigured to accommodate 5 total lanes...” (p. 5.2-27, p. 10-2) This contradicts other statements in this PEIR that indicate a study would be needed. Phyllis Place is not wide enough to reconfigure to 5 lanes. Explain the contradiction and provide the physical dimensions for Phyllis Place and an explanation for not considering the impacts of widening at this time.

Phyllis Place is designated as a major street in the Serra Mesa Community Plan. A street connection increases the ADTs on Phyllis Place to 34,540 (long term). Phyllis Place is proposed to become 5 lanes. As described in the community plan Phyllis Place will qualify for the primary arterial designation. Will a plan amendment be required? (p. 5.2-27)

The statements in this section use the phrase “shall be”. If this document is certified by the City Council, will the description of the road changes that occur after the phrase “shall be” be required to be implemented? If not, will a clarifying statement be included that describes the process for implementation? (p. 5-2-27)

Would Phyllis Place from Franklin Ridge Road to I-805 SB Ramp have Class II bike lanes and parking? (p. 5-2-27)

Would the removal of on-street parking and Class II bike lanes be required on Murray Ridge Road from I-805 NB Ramp to Mission Center Road? (p. 5-2-27)

Will removal of houses be required on Murray Ridge Road to Pinecrest Ave to be in compliance with Serra Mesa Community Plan, City General Plan and Bike Master Plan? (p. 5-2-27)

Was recent traffic calming on Sandrock considered in the PEIR? Would measures be reversed with the connection? (p. 5.2-29)

“Future development of a road on the area included the proposed CPA would likely relieve congestion on local arterial streets and freeway segments.” (p. ES-1) The PEIR study indicates that congestion on Serra Mesa roads will increase. Clarification is needed – “...relieve congestion on local Mission Valley arterial streets and Mission Valley freeway segments.” Will clarification be made? If not, provide an explanation for the exclusion.

Why wasn't an analysis to make the determination of a road connection “to relieve congestion on local arterial streets and freeway segments” in Mission Valley made? (p. 3-1)

Traffic generated by events at Qualcomm Stadium during event time weren't included in the studies. Will it be included? If not, provide an explanation for the exclusion. (p. 5.2-1)

Has an analysis been conducted to determine the capability of the I-805 bridge to withstand the added stresses of maximum tonnage of cars queuing and their engines vibrating on the bridge at peak times been done? If not, provide an explanation for the exclusion.

Impacts

The City Council Resolution 304295 for the Quarry Falls Project under the Findings section states “Encourage the use of public transit modes to reduce dependency on the automobile.” Discuss how providing a street connection whose main purpose is to provide access to I-805 will fulfill the finding to reduce dependency on the automobile.

The traffic studies show that I-805 can't be mitigated. Provide an explanation for encouraging additional congestion on a freeway that can't be mitigated. (p. 5.2-31)

The statement is made that “...and provide for a more efficient, integrated circulation network for Serra Mesa and Mission Valley, which would reduce traffic congestion, at a community level, and improve access in the area.” (p. 5.2-32, 5.2-35)

- It isn't mentioned that Mission Center Road provides a direct link with Serra Mesa and Mission Valley. Will that statement be added? If not, provide an explanation for the exclusion.
- The studies indicate there will be added traffic in Serra Mesa. Explain how traffic will be reduced and efficiency improved.

Are there any development plans along Mission Center Road from Aquatera to Murray Ridge Road?

Surrounding Serra Mesa streets will be impacted when there's traffic congestion. Alternative routes weren't studied: Raejean and Greyling Drive for Murray Ridge Road and Afton for Sandrock. Will an analysis be conducted and included? If not, provide an explanation for the exclusion. (p. 5.2-1, p. 5.2-31)

The following table shows an analysis using data extracted from Appendix C. The results for without and with connection are the same except for the shaded areas.

Long Term (2035) Traffic Analysis With and Without Connection*		
Roadway Segment	Long Term (2035)	
	W/out Connection	With Connection
Mission Center from Aquatera to Murray Ridge	LOS F	LOS F
Murray Ridge Rd from I-805 NB Ramp to Mission Center	LOS F	LOS F
Murray Ridge from Mission Center to Pinecrest	LOS F	LOS F
Murray Ridge from Pinecrest to Sandrock	LOS F	LOS F
Phyllis Pl from I-805 SB Ramp to I-805 NB Ramp	LOS E	LOS F
Rio San Diego from Qualcomm Way to Rio Bonito Way	LOS E	LOS F
Franklin Ridge from Via Alta to Civitas		LOS F
Phyllis Pl from Franklin Ridge to I-805 SB Ramp		LOS F
Intersection		
Friars /Northside	LOS E (PM)	LOS E (PM)
Qualcomm Way/Friars Road WB Ramp	LOS F (PM)	LOS E (PM)
Qualcomm Way/Friars Road EB Ramp	LOS E (PM)	LOS E (PM)
Murray Ridge /I-805 SB Ramp	LOS F (PM)	LOS F (PM)
Murray Ridge /I-805 SB Ramp	LOS C (AM)	LOS E (AM)
Murray Ridge/I-805 NB Ramp	LOS D (PM)	LOS F (PM)
Mission Center /Murray Ridge	LOS E (AM)	LOS C (AM)
Mission Center /Murray Ridge	LOS F (PM)	LOS D (PM)
Murray Ridge/Sandrock	LOS D (PM)	LOS E (PM)
Franklin Ridge/Phyllis Pl		LOS F (PM)
Franklin Ridge/Via Alta	LOS D (AM)	LOS F (AM)
Freeway Mainline		
1-805 N from I-8 to Murray Ridge	LOS F (AM)	LOS F (AM)
I-805 N from Murray Ridge to Mesa College Dr On-Ramp	LOS F (AM)	LOS F (AM)
I-805 N from Mesa College Dr On-Ramp to SR-163	LOS F (AM)	LOS F (AM)
I-805 S from SR-163 to Mesa College Dr On-Ramp	LOS F (PM)	LOS F (PM)
I-805 S from Mesa College Dr On-Ramp to Murray Ridge	LOS F (PM)	LOS F (PM)
I-805 S from Murray Ridge to I-8	LOS F (PM)	LOS F (PM)
Freeway Ramp Meter		
I-805 NB Ramp at Murray Ridge	< 15 min delay	43 min delay (PM)
I-805 SB Ramp at Murray Ridge Road	< 15 min delay	31 min delay (PM)

* In cases of contradictory data in the appendix the LOS level cited in the written discussion was used.

Will the above comparison be included? If not, provide an explanation for the exclusion?

According to the table the biggest improvement with the street connection is for the Mission Center/Murray Ridge intersection. The data didn't consider the improvements to Mission Center Road that are described in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan (p. 11-5), if the street connection is not approved.

- In the PEIR it's indicated that the mitigation measure to widen Mission Center Road from Aquatera Driveway to Murray Ridge Road isn't recommended and the impact considered significant and unavoidable. Was a structural evaluation made by either a City engineer or by Caltrans to assess the feasibility of the widening of the Mission Center Road in the area of the I-805 bridge? If not, provide an explanation for the exclusion. If the evaluation was conducted, provide the documentation from the engineer. (p. 5.2-28, p. 10-3)
- If it is feasible to widen Mission Center Road, what would be the LOS condition for the Murray Ridge/Mission Center intersection without the street connection but with the improvements? If this data isn't included, provide an explanation for the exclusion.
- An analysis was made of Via Alta and Franklin Ridge Road without the project. The 2035 analysis showed a delay of 19.3 minutes (PM), LOS B, and 37.6 minutes (AM), LOS D. Will this data and the data for the other intersections without the project be included in Table 5.2-10? If not, provide an explanation for the exclusion. (p. 5.2-18)

A direct connection exists between Serra Mesa and Mission Valley via Mission Center Road. This PEIR has identified traffic impacts during peak hours that will essentially divide the community by making it very difficult for residents of the Phyllis Place area to easily access other parts of Serra Mesa. Will this impact be discussed? If not, include an explanation for the exclusion. (p. 5.1-13)

If the street connection is approved and implemented, existing Class II bike lanes on Serra Mesa streets could be impacted. Will a discussion of the impact on existing Class II bike lanes be included in this section? If it is not added, provide an explanation for its exclusion. (p. 5.2-36)

If the removal of bike lanes is required on Murray Ridge Road from I-805 NB Ramp to Mission Center Road, will this description be included in the mitigation section? Restriping to 4-lane collector is mentioned. (p. 5.2-27, p. 10-2)

There are mitigation measures that require the removal of bike lanes (e.g., Murray Ridge Road). If any of these mitigation measures were approved, provide a discussion of compliance with the Bicycle Master Plan. (p. 5.27, p. 10-2)

If the proposed Franklin Ridge access road was extant, vehicles traveling from North Park and University Heights to I-805 will probably choose the Franklin Ridge Road route. It's shorter than alternate routes by 1 mile, it's direct, and there's no access from Texas and Qualcomm to the I-805 entrance. The adjacent image is extracted from the Final PEIR for the Quarry Falls Project, Figure 3.3.

Will the traffic from the Texas Street area be included in the study and the impact considered? If not, provide an explanation for the exclusion.



In Appendix G, p. 2 and 6, there's a chart labeled "51:Via Alta &" but there aren't any charts labeled with "Via Alta & Franklin" for 2035 with/Project. Where is the data that has been used for the analysis of Via Alta & Franklin?

The following table shows an analysis made of the impact of the connector street on Raejean Avenue - East refers to heading towards Greyling Drive and West is heading towards Murray Ridge Road.

Time	2035 Peak Flow in Vehicles/Hour		
	Connector	W/out Connector	Diff (With-W/out)
East AM	100	95	+5
West AM	190	185	+5
East PM	210	205	+5
West PM	150	145	+5

There's an increase in traffic flow with the connector. The data supports the need for more analysis of alternative routes in Serra Mesa. Will this analysis be included or additional traffic studies be conducted and discussed in the pertinent areas of the PEIR (e.g., impacts)? If not, provide an explanation for the exclusion. (p. 5.2-1, p. 5.2-31)

Change in delay of 54.6 minutes on Via Alta & Franklin Ridge Road with mitigation are shown to be significant in Appendix C, Long Term (2035) With Connection table (p. 41).

- Will this information be included in the PEIR main document? If not, provide an explanation for the exclusion. (p. 5.2-30)
- Will this information be designated and discussed as a significant impact? (p. 5.2-30)
- Does this information impact the evaluation that "...mitigation measures have been identified that would reduce potentially significant impacts to less-than-significant levels"? (p. 9-2)
- Does this information impact the evaluation that the CPA is environmentally superior? (p. ES-5, p. ES-6, p. 9-8)

Appendix C, p. 54, Table 7.1, shows the Long Term Impacts for with and without the connection. The following table uses data from Table 7.1 to show the traffic areas that are most impacted. These are the ones that were not listed in both of the columns (with and without). Can this table that shows the significant impacts be added?

Significant Impact Comparison – Long Term (2035)	
Without Franklin Ridge Road Connection	With Franklin Ridge Road Connection
Segmental Impacts:	Segmental Impacts:
	Phyllis Place from Franklin Ridge Road to I-805 SB Ramp
	Franklin Ridge Road from Via Alta to Civita Boulevard
Intersection Impacts:	Intersection Impacts:
Mission Center Road/Murray Ridge Road	
	Murray Ridge Road / Sandrock Road
	Murray Ridge Road / I-805 NB ramp
	Via Alta / Franklin Ridge Road
Freeway Ramp Meter Impacts:	Freeway Ramp Meter Impacts:
	I-805 NB On-Ramp at Murray Ridge Road
	I-805 SB On-Ramp at Murray Ridge Road

The statement regarding necessary access points contradicts the following statement: "Therefore, the traffic study concluded there was limited additional benefit to these more than 200 homes for evacuation by having a road connection, and all of the other surrounding communities have multiple access or egress routes." Explain the contradiction. (p. 5.2-32, p. 5.2-35, p.5,2-37)

The Climate Action Plan discusses reduction in GHG emissions from transportation and expanding alternative transportation choices. A bicycle and pedestrian access exists at Kaplan and a trail is required to be constructed with bicycle and pedestrian access. Discuss the street connection in relationship to the Climate Action Plan.

Currently, dozens of vehicles of residents of Civita create parking problems by encroaching and impacting the parking of Serra Mesa residents at Ainsley Road and Kaplan Drive. (The reasons are unknown – Civita residents using their garages for storage or convenience or easier to park on the street rather than parking on their project streets or too many vehicles with insufficient parking within Civita.) A street connection will make it easier for people to park on the streets in Serra Mesa. This item wasn't discussed. Will parking on Serra Mesa streets be impacted? If affirmative, will parking impacts be studied? If not, provide an explanation for the exclusion. (p. 5.2-7)

Community Access (p. 5.2-34) - "Refer to Chapter 8 of the traffic study (Appendix C to the PEIR) for a full discussion of how this analysis was conducted." There isn't a Chapter 8 in the corrected Appendix C. The corrected EIR notice states "The corrected version of Appendix C was used to prepare Chapter 5.2 Traffic/Circulation and Parking in the draft PEIR. The corrected Appendix C merely clarifies the accurate and adequate analysis included in the draft PEIR." If the corrected PEIR was used for Chapter 5.2, why is there a reference in this PEIR to Chapter 8, which is found in the previous Appendix C? Provide an explanation for the discrepancy.

Community Access (p. 5.2-34, p. 9-6) – Two reference points were selected (one at the top of the north end of the connection and the other at the south end between Friars and Qualcomm Way). The times for each of these points to the amenity were averaged.

- What would be the impact if the results weren't averaged? Will this information be added? If it is not added, provide an explanation for its exclusion.
- Why isn't the data being presented individually for each community – Serra Mesa and Mission Valley?
- Where is the data that was averaged? These times do not seem possible and do not make sense. Explain where and how the data was collected and analyzed.

Community Access – Refer to Appendix J of Appendix C

- Some of the data listed doesn't make sense. Sharp Hospital and Rady's are located right next to each other – why is the distance the same for Point A but there's a .7 mi. difference for Point B for Sharp. Also, if the freeway and surface columns are intended to add up to equal the distance column, the data is incorrect for the Point A table; and some of it's wrong in the Point B table. Will this information be corrected? If not, provide an explanation.
- What is the logic behind averaging the time between two points for the hospitals, fire stations, schools, and library, and shopping centers and then summing them? For example - Why not use one representative hospital, e.g., Sharp Hospital? Why would the closest facility not be analyzed? Why is it pertinent to get to the farthest facility from a location? Provide documentation that this is a valid method for analyzing accessibility. If this is not a valid method, will the analysis be redone and included? If not, provide an explanation for the exclusion.
- Is there a fire station planned for Civita (reference San Diego Future Quarry Falls)?
- The data doesn't appear to take into account the freeway impacts in Serra Mesa if the road connection was approved. The freeway data didn't change in the tables. If the impacted freeways were considered, what would be the data? Would it take longer to get to facilities with traffic even when the facility is closer by distance?

In Appendix C, Traffic Impact Analysis, Chapter 6, Bus Service, p. 47, it was stated that “In the future MTS could take advantage of a new road connection using Franklin Ridge Road to introduce bus service between Mission Valley and Serra Mesa via that route. However, in earlier discussions no commitment was made about actually providing such service or changing the route structure to accommodate that.” Will the second line of the statement about MTS’s non-commitment be added to this section? If not, provide an explanation for the exclusion. (p. 5-2-36)

There’s no discussion on the impact of the street connection on existing parking spaces. A 1.3 acre park without a parking lot will be constructed next to the street connection and Phyllis Place. The only available parking is street parking. The park guidelines indicate “No on-site parking, except for disabled access.” Will the parking spaces adjacent to the park be removed? If affirmative, discuss the parking impact, especially for disabled access.

Air Quality

The sensitive receptors are 56 retirement units across from the street connection, a public park to be constructed next to the street connection, and a school at Faith Community Church. Additionally, there may be a school at Via Alta. The Significant Determination Thresholds states that “If sensitive receptors are involved, the more restrictive of the guidelines should be applied.”

- Was an analysis of the respirable particulate matter and fine particulate matter made for each of the sites? If affirmative, will this information be included? If not, provide an explanation for the exclusion. (p. 5.3-9, p. 5.3-20)
- Will a hotspot analysis be conducted? If not, give an explanation for its exclusion. (p. 5.3-20)

The Air Quality Report uses the baseline weather data from Lindbergh Field. However, the National Weather Service, also, maintains observations at Montgomery-Gibbs Executive Airport, located about 1.5 miles away and in the same wind flow patterns. Will the report be updated using the data from Montgomery-Gibbs Executive Airport for the analysis? If not, provide an explanation for the exclusion. (p. 5.3)

This section indicates that the proposed CPA for a street connection would not include trip-generating uses but 4,780 units are being built at Civita and it will redistribute traffic from Mission Valley to Serra Mesa. A CPA which is specific to Serra Mesa creates additional traffic in Serra Mesa. Will the air quality impacts for Serra Mesa from trip generating redistribution be included in this section? (p. 5.3-16, p. 5.3-20)

What does “Note: Cumulative regional air quality impacts cannot be mitigated at the project level” mean? (p. 5.3-25)

The construction of the street connection would concentrate vehicle trips in a specific area. The traffic study indicates there will be significant delays causing queuing in the vicinity of the I-805 ramps. Was the pollution from this queuing and the impacts on this area studied? If not, give an explanation for the exclusion. (p. 5.3-17)

“Operational emissions would not result in a significant net increase in VMT since the street would only result in redistribution of vehicle trips in the study area.” The ADTs on Phyllis Place will increase from 2,420 (existing) to 34,540 (long term). The construction of the street connection would concentrate vehicle trips in a specific area on a steep street.

- What is the maximum grade of the street connection? Would the grade of the street impact air pollution? If the grade will impact air pollution, will it be discussed, studied, and added? If it won’t, provide an explanation. (p. 5.3-17)

- Would emissions collect at Phyllis Place (e.g., winds blowing up the hill), located across from retirement units? If there's a possibility of emissions collecting, will it be discussed, studied, and added? If it won't, provide an explanation. (p. 5.3-17)

The site for the road connection was not approved for Quarry Falls. Provide an explanation for assuming that "vehicle trip generation and roadway construction for this specific site has been anticipated in the RAQs." (p. 5.3-16, p. 5.3-19)

"In accordance with the CO Protocol, CO hotspots are typically evaluated when (1) the LOS of an intersection or roadway decreases to LOS E or worse, (2) signalization and/or channelization is added to an intersection, and (3) sensitive receptors such as residences, schools, and hospitals are located in the vicinity of the affected intersection or roadway segment." (p. 5.3-22)

- The Mission Center/Murray Ridge intersection is designated LOS C (existing) and LOS E for AM and LOS F for PM (long term) without the connection. Will an analysis of this intersection be added? If not, provide an explanation for the exclusion. (p. 5.3-23)
- Mission Center Road from Aquatera to Murray Ridge Road segment will change from LOS E (existing) to LOS F (long term) with and without the connection. Will an analysis of this roadway intersection be added? If not, provide an explanation for the exclusion. (p. 5.3-23)

Hye Park, 103 multifamily residential units, is located within Serra Mesa at Sevan Court adjacent to Mission Center Road. The complex is at the bottom of a deep ravine that can block air circulation. The ADTs will increase on Mission Center Road from Aquatera Drive to Murray Ridge Road from 9,035 (existing) to 13,064 (long-term) with the connection and 23,850 (long term) without the connection. Would emissions collect in the Hye Park area? If there's a possibility of emissions collecting, will it be studied, discussed, and added? If it won't, provide an explanation. (p. 5.3-23)

Noise

As stated regarding significant thresholds "Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project." The ADTs for Franklin Ridge Road/Phyllis Place will increase from 2,420 (existing) to 34,540 (long term) with a LOS F (PM).

- The long term impacts with the street connection and without the street connection show a change of either 0 or 1dB in the residential areas of Murray Ridge Road and Phyllis Place and at City View Church even though the ADTs will increase tremendously at each of those areas. Provide an explanation for the illogical conclusion. If this conclusion is incorrect, will the appropriate areas of the PEIR be corrected? (p. 5.4-6, 5.4-7)
- The long term impacts with the street connection show an increase of +1 for the residential adjacent to Phyllis Place but 0 for City View Church. This isn't logical; the church is located closer to the street connection rather than the residential. Provide an explanation for the illogical conclusion. If this conclusion is incorrect, will the appropriate areas of the PEIR be corrected? (p. 5.4-6, p. 5.4-7)
- Since Serra Mesa is located above Mission Valley were climatic and the environmental conditions included or considered in the noise analysis? If not, will an analysis be included? If not, provide an explanation for the exclusion. (p. 5.4-3)
- Vehicles will be queuing on a street connection with a steep grade. What will be the noise level during the peak time? If this information won't be included, provide an explanation for the exclusion. (p. 5.4-3)

- “Heavily used commuter roadways, such as arterials and major streets, also generate significant levels of noise, typically 65 to 75 dBA CNEL at an adjacent receptor” (City of San Diego Final PEIR, p. 3.10-3). Phyllis Place will become a heavily used major arterial. Discuss the noise impact on the adjoining retirement homes, church, and single-family dwellings. (p. 5.4-3)
- The Final PEIR for the Quarry Falls Project (p. 10-49) identified 72 CNEL for the Franklin Ridge Road-Via Alta-Phyllis Place segment. Discuss the discrepancy between the Quarry Falls noise study and the noise study in this PEIR. If the 72 CNEL is the actual noise level, will this PEIR be updated? If not, provide an explanation for the exclusion.
- “Although not generally considered compatible, the City conditionally allows multiple unit and mixed-use residential uses up to 75 dBA CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses.” (Noise Element, p. NE-9) The area of the street connection in Serra Mesa is zoned for single family dwellings and there will be single family units in the Civita area of the street connection. If it’s determined that the Franklin Ridge Road-Via Alta-Phyllis Place segment is 72 CNEL (refer to previous bullet), discuss the allowance of a street connection in regards to the cited Noise Element guidelines and attenuation measures. (p. 5.4-3)

Include the maximum measurements of noise and their frequency or provide a reason for their exclusion. (p. 5.4-3)

Provide the standard deviation for the noise measurements or a reason for their exclusion. (p. 5.4-3)

The residential area near the corner of Mission Center Road and Murray Ridge Road has a steep slope and a lot of traffic. Will this corner be added to the study? If not, provide an explanation for the exclusion. (p. 5.4-5, 5.4-10)

Why were sites R1 and R8 selected for the noise study? These two areas are located in Mission Valley and aren’t connected to Civita. Will the additional sites in Serra Mesa that are significantly impacted by the street connection as shown by the traffic study – along Murray Ridge Road and Sandrock Road be added to the noise study? If not, provide an explanation for the exclusion. (p. 5.4-5)

Noise was analyzed using the data from the traffic study. If the traffic study data is inaccurate, will the noise study be redone? (p. 5.4-5)

The table on p. 5.4-5 isn’t labeled. Is this Table 5.4.4? Is the data in the Long Term column “Long Term without Project”? Will the table be updated with labeling? If not, provide an explanation for the exclusion.

According to CEQA Guidelines, 15131 (b), “Economic or social effects of a project may be used to determine the significance of physical changes caused by the project... As an additional example, if the construction of a road and the resulting increase in noise in an area disturbed existing religious practices in the area, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment.” Was an analysis made of the impacts of the street connection on the religious practices of City View Church and of Faith Community Church? If so, what were the results? If not, will an analysis be conducted and included? If not, provide an explanation for the exclusion.

“Heavily used commuter roadways, such as arterials and major streets, also generate significant levels of noise, typically 65 to 75 dBA CNEL at an adjacent receptor” (City of San Diego Final PEIR, p. 3.10-3). Mission Center Road from Aquatera to Murray Ridge Road without the connection will become a heavily used major roadway with ADTs of 23,850. Discuss the noise impact on the adjoining Hye Park condominium complex. (p. 5.4-3)

Biological Resources

The Biological Resources Letter, Appendix F, page 6, states that “The quantification of biological resources described herein pertain to the project site only (approximately 2-acres) and do not include the 150-foot survey buffer evaluated during the reconnaissance. The 150-foot buffer is included on project maps to provide context as to the type of adjacent biological resources present only.”

- “The analysis takes into account a 100-foot buffer encompassing the area of potential effect of a future roadway.” (p. 5.4-14) Is this 100-foot buffer the same as the 150-foot buffer referred to in the letter? Provide the analysis documentation.
- If the street connection is approved, it will traverse through Phyllis Place Park and create the need for additional park space. Would this required additional space be located in the MSCP area? If affirmative, what does the assessment of this area indicate?

Hydrology/Water Quality

If City View Church is required or finds it necessary to make changes to their parking lot and/or driveways because of the street connection, will changes to the stormwater be required? If affirmative, provide a description of the changes and impacts. Would the cost of any needed changes be included in the Serra Mesa Facilities Financing Plan? (p. 5.8-6)

Visual Effects and Neighborhood Character

Two park designs (one with the street connection and one without the street connection) have gone through the design approval process and the Park Development Agreement requires construction of the park. If the street connection was approved, the street would run through the park dividing it in two. The street connection would impact the view from the park. Will this information be included? If not, provide an explanation for the exclusion? (p. 5.9-1, 5.9-4, p. 6.0-8)

Will vehicles traveling at night on the street connection with headlights on and street lights impact the 56 multifamily retirement homes located at City View Church? If there is an impact, discuss mitigation measures. (p. 5.9-2, p. 5.9-10, p. 6.0-8)

What is a “horizontal element to the existing paved roadway”? Will the description be included? If not, provide an explanation for the exclusion. (p. 5.9-6, p. 6.0-8)

Phyllis Place is the only street in and out the neighborhood for the 56 multifamily retirement units located at City View Church as well as for the Abbotshill area. The street connection would increase ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place. Describe the criteria used to conclude that “impacts would be less than significant”. (p. 6.0-8)

Phyllis Place will be changed from two lanes to five lanes (a major arterial) and the street connection will be four lanes. Massive increases in traffic are projected.

- Discuss how this would not strongly contrast with the surrounding topography. (p. 5.9-7)
- The PEIR states “Note: for substantial alteration to occur, new development would have to be of a size, scale, or design that would markedly contrast with the character of the surrounding area.” Discuss how this would not be a change in scale in comparison to the low density housing residential zoning. (p. 5.9-7)
- Given the significant changes provide an explanation for the conclusion that “Impacts would be less than significant.”

During peak traffic times access from the Abbotshill community to the rest of Serra Mesa will be impacted, affecting the support of local businesses and civic events. Will this impact on neighborhood character be discussed? If not, provide an explanation for the exclusion.

Cumulative Impacts

Cumulative Impacts Found To Be Significant (p. 6.0-1) – There isn’t any description in this section. Will a description be added? If not, provide an explanation for the exclusion.

Table 5.2-15 is missing. Will the table be added? If not, provide an explanation for the exclusion. (p. 6.0-3)

Refer to the Not Mentioned in the PEIR and Traffic Circulation/Parking and Parking sections of this letter. If there’s any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion. (p. 6.0-1)

Refer to the Not Mentioned in the PEIR and Air Quality sections of this letter. If there’s any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion. (p. 6.0-3)

Refer to the Not Mentioned in the PEIR and Biological Resource sections of this letter. If there’s any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion. (p. 6.0-3)

Refer to the Not Mentioned in the PEIR and Hydrology/Water Quality sections of this letter. If there’s any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion. (p. 6.0-5)

Refer to the Not Mentioned in the PEIR and Land Use sections of this letter. If there’s any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion. (p. 6.0-6)

Refer to the Not Mentioned in the PEIR and Noise sections of this letter. If there’s any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion. (p. 6.0-6)

Refer to the Not Mentioned in the PEIR and Public Services and Facilities sections and any reference to the park at Phyllis Place of this letter. If there’s any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion. (p. 6.0-6)

Refer to the Not Mentioned in the PEIR and Visual Effects and Neighborhood Character sections of this letter. If there’s any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion. (p. 6.0-8)

Effects Not Found To Be Significant

Energy (p. 7-2)

The Final PEIR for the Quarry Falls Project on page ES-18 states that with a road connection the “existing SDG&E high-pressure gas line would be raised within its existing alignment and easement to achieve a preferred depth of three feet from finished elevation.” This creates an alteration to existing utilities. Will this impact be discussed? If not, provide an explanation for the exclusion.

Would any changes be needed to the fiber optics located in this area? If yes, will this information be included and discussed? If not, provide an explanation for the exclusion. (p. 7-2, p. 7-16)

Was SDG&E consulted to determine if a street connection would impact maintenance of high power lines? If yes, what were their comments? If not, will they be contacted? If they won't, provide an explanation for the exclusion.

Greenhouse Gases

Construction (p. 7-7) – “...considering most of the grading has already occurred.” The area near Phyllis Place doesn't seem to be graded. Provide documentation that it has been graded. If the area hasn't been graded, will this analysis be updated? If not, provide an explanation for the exclusion.

Operation (p. 7-7) – Will this section be updated to reflect the information in the Not Mentioned in the PEIR and Air Quality sections of this letter? If not, provide an explanation for the exclusion.

Public Services and Facilities

Parks and Recreation Facilities (p. 7-13)

Will this section be updated to reflect the information in the Not Mentioned in the PEIR section of this letter? If not, provide an explanation for the exclusion.

Will the Franklin Ridge Road connection traverse through open space? Or will the additional space that's needed for the park if it's split in two require open space land? If yes, will this information be included and discussed? If not, provide an explanation.

Fire-Rescue Services (p. 7-14) – Will this section be updated to reflect the information in the Not Mentioned in the PEIR section of this letter? If not, provide an explanation for the exclusion.

Public Utilities (p. 7-15)

The Quarry Falls PEIR on page ES-18 states that with a road connection the “existing SDG&E high-pressure gas line would be raised within its existing alignment and easement to achieve a preferred depth of three feet from finished elevation.” This creates an alteration to existing utilities. Will this impact be discussed? If not, provide an explanation for the exclusion.

Mandatory Discussion Areas

Significant Effects Which Cannot Be Avoided (p. 8-1) – Table ES-1 is missing. It's hard to make the significant effects determination when there's critical information that's missing and pertinent studies that were not conducted. If any of the items identified in any sections of this letter (e.g., Not Mentioned in this PEIR) will have a significant effect, will this section be updated? If not, provide an explanation for the exclusion.

Alternatives

Project Objectives (9-2): The General Plan and Community Plan Amendment Manual states that “To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.” City Council Resolution 304297 directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

Will the above information be added? If not, provide an explanation for the exclusion. If these objectives had been used, as required by the City Council, in the studies and the analyses, what would be the conclusion for each alternative?

Amend the Mission Valley Community Plan (p. 9-3)

- The statement “This alternative is rejected because it would not promote intercommunity connectivity as envisioned in the City’s General Plan.” Intercommunity connectivity exists via Mission Center Road and Mission Village Drive. Will this information be added? If not, provide an explanation for the exclusion. Also, provide an explanation for the basis for rejecting this alternative and conducting the subsequent studies when the intercommunity connectivity already exists.
- The Mission Valley Community Plan is currently being updated and could be updated to be consistent with the Serra Mesa Community Plan. Discuss the feasibility of amending the Mission Valley Community Plan.

No Project Alternative

Land Use (p. 9-4)

The analysis doesn’t mention that there are inconsistencies in the Mission Valley Community Plan that would require community plan amendments.

- The Sand and Gravel Re-use Development section (p. 56) states “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” This statement is consistent with the Serra Mesa Community Plan.
- “Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed.” (p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.

Mission Center Road and Mission Village Drive provide multiple linkages between Serra Mesa and Mission Valley. Will this information be added to the analysis and considered in the conclusion? If not, provide an explanation for the exclusion.

“...impacts on land use would be greater than the proposed project.” Describe the criteria used to reach the “greater” conclusion.

If the inconsistencies in the Mission Valley Community Plan which probably require amendments to the Mission Valley Community Plan and existing linkages that already exist are considered, would the impacts be considered “greater”?

Transportation/Circulation and Parking (p. 9-4)

Murphy Hill should be corrected to Murray Ridge.

Since the studies don’t show the data for Long-Term without Connection provide an explanation for the conclusions that are reached regarding impacts.

Conclusion (p. 9-5, p. 9-6) – The following information was not included or discussed in this draft PEIR: Emergency access exists from Civita to Serra Mesa via Kaplan Drive, the completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access and linkages, the developer will provide a trail connection between Serra Mesa and Civita in Mission Valley for pedestrians and bikers, and Mission Center Road is a direct route connecting Murray Ridge Road in Serra Mesa to Friars Road in Mission Valley.

- If this information were included and used in the evaluation, what would be the impact on the “No Project” alternative?
- If the issues that staff was required to study as defined in the City Council resolution were considered, what would be the outcome? (Refer to Objectives section of this letter)

Air Quality (p. 9-4)

If an analysis of air quality in the Hye Park condominium complex area is conducted and shows a significant impact without the street connection, will this result be added and discussed? If not, provide an explanation for the exclusion.

Biological Resources (p. 9-5)

The certified Final PEIR for the Quarry Falls Project, page ES-18, determined “This alternative would also result in greater impacts to biological resources, due to construction of the road through sensitive habitat.” Explain the contradiction to the conclusion that was reached in this PEIR “As such, the same impacts to biological resources would result under this alternative.” (p. 9-5)

Bicycle, Pedestrian, and Emergency Access Only Alternative

Land Use (p. 9-6) – The Mission Valley Community Plan contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” Why isn’t it mentioned that the Mission Valley Community Plan could be amended and there would be consistency?

Transportation/Circulation and Parking (p. 9-6) – Refer to the Transportation/Circulation and Parking section of this letter. Questions are raised about the validity of the Community Access data. If this data is revised, would the conclusion change?

Project Objectives (p. 9-7)

- Describe the Project Objectives that the alternative would not meet.

- Refer to the Objectives section of this letter. If the issues that staff was required to study as defined in the City Council resolution were considered, what would be the outcome?

Environmentally Superior Alternative (p. 9-8, p. 9-9)

The conclusion that is reached regarding the “No Project Alternative” is based on an inconsistency between the Serra Mesa Community Plan and the Mission Valley Community Plan and providing circulation linkages between the two communities. Linkages already exist with Mission Center Road and Mission Village Drive and the Mission Valley Community Plan contains inconsistencies. Amending the Mission Valley Community Plan to provide consistency wasn’t analyzed. Refer to the No Project section of this letter. What would be the conclusion if the linkages and the Mission Valley Community Plan inconsistencies were considered?

Land Use – “The no project alternative would not resolve the inconsistency between the Mission Valley and Serra Mesa Community Plans...” The Mission Valley Community Plan contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” Why isn’t it mentioned that the Mission Valley Community Plan could be amended and there would be consistency?

Transportation/Circulation and Parking

“Impacts would be significant and unavoidable...” The studies don’t necessarily support this conclusion for the “No Project Alternative Impacts” and “Bicycle Pedestrian Emergency Access Only Alternative Impacts.” Also, refer to traffic impacts for all of the intersections identified to operate at LOS E and LOS F (p. 5.2-17, p. 5.2-18). Since the studies don’t show the data for Long-Term without Connection provide an explanation for the conclusions that are reached regarding impacts.

With the street connection there are 43 minute delays at I-805 and 54.6 minutes change in delay on Via Alta and Franklin Ridge Road with the mitigation (Appendix C, p. 41). The “No Street Connection” shows 15 minute delays on I-805, which is within the acceptable range in the year 2035. The data doesn’t support the analysis that “...the No Project Alternative would not reduce any potentially significant environmental impact.” Will this information be added to this discussion of environmentally superior alternative? If not, provide an explanation for the exclusion. (p. 9.8, p. 9.9)

54.6 minutes change in delay on Via Alta & Franklin Ridge Road with mitigations is shown to be significant in Appendix C (p. 41). Why isn’t this fact included in the main PEIR report under significant impacts? Will it be added? Does this impact the evaluation that the “with connection is superior”? If it isn’t added, provide an explanation for the exclusion.

The PEIR identifies significant environmental impacts in transportation/circulation. Provide the specific data that supports the CPA as the Superior Alternative. If not included, provide an explanation for the exclusion.

It’s hard to make the significant effects determination when there’s a large amount of critical information that’s missing and pertinent studies that were not conducted. If any of the items identified in any of the sections of this letter (e.g., Not Mentioned in this PEIR) will have a significant effect, will this section be updated? If not, provide an explanation for the exclusion.

If the alternative to amend the Mission Valley Community Plan were included and investigated, would it prove to be the environmentally superior alternative?

The conclusion that is reached "...that there is no environmentally superior alternative as compared to the proposed CPA" doesn't consider the linkages that already exist between the two communities and the inconsistencies within the Mission Valley Community Plan. (Refer to the No Project section of this letter.) What would be the conclusion if the linkages and the Mission Valley Community Plan inconsistencies were considered?

Mitigations

For each of the mitigation measures that have been identified who will pay for them and when will they be implemented? (Section 5.2, p. 10-1)

Table 5.2-15 is missing. Will it be added? If not, provide an explanation for the exclusion.

Thank you for the opportunity to review this PEIR. If you have any questions with reference to any of the items raised in our response, please contact me. We look forward to your response within the duly allowed timeframe.

Respectfully,

A handwritten signature in black ink, appearing to read "Bob Crider". The signature is fluid and cursive, with the first name "Bob" being more prominent than the last name "Crider".

Bob Crider
Chair, Serra Mesa Planning Group