Serra Mesa Planning Group

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May 18, 2017

RE: Serra Mesa Community Plan Amendment Roadway Connection Project
Project No 265605

Susan Morrison
Environmental Planner, City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Dear Ms. Morrison:

The Serra Mesa Planning Group (SMPG) discussed the Serra Mesa Community Plan Amendment Roadway Connection Project: Draft Environmental Impact Report at our May 18, 2017 meeting and passed a motion to approve this letter. This letter is the result of a careful review of the Recirculated DEIR and recognition of the permanence and far reaching impacts of a roadway connection. Please note that Civita was formerly called Quarry Falls; and City View Church, formerly First Assembly of God. The Reference section at the end of this letter contains information on references in the letter to other documents.

According to state CEQA guidelines, Article 7,15088.5 f(1): (g) When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR. The Recirculated DEIR states "This revised and recirculated Draft Environmental Impact Report (DEIR) analyzes impacts at a project level to ensure that all potential significant environmental effects associated with the project are disclosed." (Chapter 4)

We note at this time that the half-page (Chapter 4 History of Project Changes) is a very broad inadequate response to our detailed 27-page (June 26, 2016) submittal, that does not meet the indicated CEQA guidelines requiring summarizing (sic) the revisions made to the previously circulated draft EIR.

Listed below are specific questions and comments organized by topics.

Omitted in this Recirculated DEIR:

- 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.

- "Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour." (p. 124)

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 contradiction and needs amending.

- Emergency access exists from Aperture Circle in Civita to Serra Mesa via Kaplan Drive and can be seen in the Addendum, p. 10.
- The completed emergency access and sidewalks at Kaplan Drive provide bicycle and pedestrian access and can be seen in the Addendum, p. 10.
- The developer, Sudberry Properties, has indicated that they 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.

Will each of the above items be added to and discussed in the appropriate areas of the Recirculated DEIR? 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

What other means of reconciling the Serra Mesa and Mission Valley Community Plans have been attempted?

The Final PEIR for the Quarry Falls Project, Figure 5.2-3, and the Quarry Falls Specific Plan, Figure 4-16, show a minimum of one trail between Civita and Phyllis Place Park without the roadway connection. The trail provided by the developer can be accessed by pedestrians and bikers and will provide connectivity to the LRT line. Can you include this schematic? If not, provide an explanation for the exclusion.

Grade

- Provide documentation for the analysis of the grade.
- Can a grading map for the roadway 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.
- The Recirculated DEIR indicates the maximum grade is 7% (3.3.1.1). However, the Final PEIR for the Quarry Falls Project states "A Preliminary Road Profile Evaluation for the segment of Franklin Ridge Road to Phyllis Place has been prepared by TCB/AECOM that determined the grade of the road would be less than 10%; a deviation from standards has been submitted and conceptually approved by the City of San Diego for Franklin Ridge Road." (p. 900 of 1042) Also, in the same document the road is described as a four lane Major Street. (p. 10-39) According to the Street Design Manual the maximum grade for a Major Street is 7%. (p. 45) Since a deviation from standards is needed, the road connection must be greater than 7%. Additionally, the developer confirmed in May 2017 that the grade of the road from Phyllis Place to the Via Alta/Franklin Ridge intersection would be just under 10% at the steepest section. Explain the discrepancy in maximum grade analysis.
- Discuss the grade of the roadway connection as it pertains to ADA requirements.

Executive Summary

Refer to the appropriate sections of this letter for comments that would relate to the Executive Summary.

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." (p. 5) City Council Resolution 304297 (October 2008) 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 Recirculated DEIR? If not, provide an explanation for the exclusion.

What portions of the Recirculated DEIR address the four charged issues identified in the Resolution?

The objectives that are being used for this Recirculated DEIR are different than the ones used in the DPEIR. These are the ones with substantive changes:

DPEIR	Recirculated DEIR	Change
Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa.	Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.	Multi-modal linkage from Friars Road replaces connection from Mission Valley
Amend the Serra Mesa Community Plan to include a street connection from the existing Phyllis Place Road into Mission Valley, that if developed in the future, could: • Improve the overall circulation network in the Serra Mesa and Mission Valley planning areas.	Improve local mobility in the Serra Mesa and Mission Valley planning areas.	Local mobility replaces overall circulation network
• Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.		Deleted from the Recirculated DEIR

Why were changes made to the objectives?

The following objectives weren't listed in City Council Resolution 304297 (October 2008):

- Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.
- Improve local mobility 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.
- Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.
- Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

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.

Provide a concise description of the justification for the project.

NOP and Scoping Meeting

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 Recirculated DEIR?

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 of God?" "What is the anticipated amount of time for queuing during peak traffic times?" "How much pollution is expected during this time?"

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?"

Public Services:

"The discussion doesn't include the Kaplan Drive emergency connection. What benefits and impact will the Kaplan Drive emergency connection provide?"

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..." (p. 46) Will the Franklin Ridge Road connection traverse through open space? Or will the additional space that's needed for the park if it is split in two and/or the widening of Phyllis Place require open space land? If affirmative, discuss the significant impact on land use.

The DPEIR referenced consistency with the bicycling goals in the Mobility Element including "A safe and comprehensive local and regional bikeway network". This Recirculated DEIR doesn't include the following policy, "Develop a bikeway network that is continuous, closes gaps in the existing system, improves safety, and serves important destinations." (Policy ME-F.2.a) Since the roadway connection will create an unsafe situation for vehicles entering and exiting the City View Church driveway and bicycle lanes would be removed if at least six of the mitigations were implemented, discuss the consistency of the roadway connection with this policy. (Note: Since not all of the mitigations are described in detail, it's hard to determine the exact number of mitigations that would require removal of bike lanes for implementation.)

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 any item.

- 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." Why isn't this statement mentioned? (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)
- "Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour." (Mission Valley Community Plan, p. 124) The road would extend above the 150-foot elevation contour. (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; 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 roadway connection, a collector road, is access to I-805. Provide an explanation for how this meets the ME goal of "Safe and efficient street design that minimizes environmental and neighborhood impacts" and ME-C.3 regarding "choice of routes to neighborhood destinations" and "designed to control traffic volumes".

- The developer will provide a minimum of one 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; F. Bicycling Goal; Policy UD-A.2; 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 Recirculated DEIR? (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 this Recirculated DEIR? (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; F. Bicycling Goal; Policy UD-A.2; Policy UD-B.5; Policy UD-C.6; Policy UD-C.7; l)

- Two park designs (one with the roadway connection and one without the roadway connection) for Phyllis Place Park have gone through the design approval process and the Park Development Agreement, p. 2, requires construction of the park.

    - "The proposed project would somewhat divide the park by placing a roadway in between the two portions of it." (5.1.4.1) Phyllis Place Park will definitely be split into two with the project. It's only logical that there would be more safety issues (e.g., children playing ball, flying a kite, etc.). Describe the potential for safety issues. (A. Walkable Community Goal II)

    - Splitting a park into two with a roadway connection will impact the park aesthetically. Why wasn't this discussed as an impact since the view of the roadway connection from the eastern park portion will be visible on two sides? (Policy UD-C.7)

- What is the maximum grade of the roadway 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 roadway connection and the impact a roadway 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)

- The roadway 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 is constructed. (Policy UD-C.6)

- Explain how the roadway connection would reduce congestion when the traffic studies indicate more congestion in Serra Mesa. (Policy ME-C.2)

- "Design new connections, and remove any barriers to pedestrian and bicycle circulation in order to enable people to walk or bike, rather than drive, to neighboring destinations." (Policy UD-C.6)

- Explain how the roadway connection, which would increase ADTs from 2,420 (existing) to 34,540 (2035) 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." (Citations from p. NE-9,Noise Element)

- Describe the transit services that would become "more readily available" (5.2.7.3) 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 traveling 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 roadway connection – number of lanes, ADTs, and grade. Discuss how the design will meet the Street Design Manual guidelines. If the roadway won't meet the guidelines, discuss the required deviations. Note: Deviations for this roadway connection are mentioned in City Council Resolution 304295, p. 15 of 28 (October 2008).

- The Mobility Element of the General Plan discusses street design. Discuss the pedestrian barrier to the segmented park that the four lane roadway 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 roadway 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 roadway and mitigations requiring widening of streets 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 roadway 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 (SMCP). 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 roadway connection which will increase the ADTs from 2,420 (existing) to 34,540 (2035) impacts the residential character. (Plan Elements, p. 5 of SMCP)

- Splitting a park into two with a roadway connection will impact the landscape and hillside. (Proposal Street and Highways, p. 41 of SMCP)
- Emergency access via Kaplan Drive in Serra Mesa which is located adjacent to Civita housing exists. (Proposal – Fire Protection, p. 25 of SMCP)
- The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access. (Parks & Recreation Element Goals, p. 18 of SMCP)
- The developer will provide a minimum of one trail between Phyllis Place Park in Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Proposal – Bicycles Routes, p. 42 of SMCP; Parks & Recreation Element Goals, p. 18 of SMCP)
- "To provide a safe, balanced, efficient transportation system with minimal adverse environmental effects." The roadway connection will adversely impact the environment. (Transportation Element – Goals, p. 41 of SMCP)
- 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 roadway connection and one without the roadway connection) for Phyllis Place Park have gone through the design approval process and the Park Development Agreement, p. 2, requires construction of the park.
    - Splitting a park into two with a roadway connection could create a safety issue. (Objective – Physical Environment-Urban Design, p. 50 of SMCP)
    - Splitting a park into two with a roadway connection will impact the park aesthetically. (Objective – Physical Environment-Urban Design, p. 50 of SMCP)
- Will the roadway connection traverse through open space? Or will the additional space that's needed for the park if it's split in two or the Phyllis Place widening mitigation require open space land? If affirmative, explain how this would meet the goal that "Open space should be preserved." (Environmental Management Element, p. 48 or SMCP)
- An objective is "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, listed in the Proposals is "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 roadway connection meets the objective and proposal of the community plan. (Environmental Management Element, p. 48 of SMCP)

5.2 Transportation/Circulation and Parking

Data

Data Collection

- The Notice of Preparation meeting was held in February 2012. True Count conducted event counts for intersections in May 2012, November 2012 and in May 2013. MetroCount Traffic Executive conducted the segment count in June 2011 (prior to the NOP). Pacific Technical Data prepared the intersection turning movement counts in May-June 2013. Katz, Okitsu & Associates conducted the peak hour intersection and arterial analysis in April 2012. Koa Corporation confirmed the data in 2013 and prepared the Traffic Impact Study in 2015 for the 2016 PEIR. Chen Ryan is the preparer for this 2017 Recirculated DEIR. Given that there have been multiple consulting companies involved in the data collection and analysis and actual counts are based on either 2011, 2012, or 2013 data, discuss the validity of this Traffic Impact Study.

- The Traffic Impact Study Manual states that "The count data used in traffic impact studies should be no more than two years old. If recent traffic data is not available from the City, current counts must be made by the consultant." (p. 10) Discuss this guideline in relationship to the count data that was collected more than two years ago. If the data is deemed "too old", will a new study be conducted and this Recirculated DEIR updated to reflect the new data?

- Describe the procedure used to determine the near-term data.
    - Is the near-term data for intersections based on the data collected in 2011 and/or 2013?
    - If the near-term data for intersections is based on the 2011 data, were projects developed after 2011 included in the analysis? If so, provide the name and size of these developments.

- These questions are appropriate if data collected in 2011 and/or 2013 was used as a basis for the near-term data.
    - Were the traffic studies in 2011 and 2013 conducted when school was in session?
    - Were they conducted at the same period of time of the day and on the same day of the week?
    - What method was used for traffic volume count?
    - 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?

- Near-Term 2017 baseline traffic conditions inaccurate and incomplete: The Traffic Impact Study includes traffic volumes in 3 scenarios: Existing Conditions 2013, Near-Term 2017, and Long-Term 2035. The study uses the comparison of Near-Term Baseline with No Project and Near-Term with Project to identify significant traffic impacts. While the data for 2013 Existing Conditions were obtained through machine data collected in the field in 2011 and 2013 (Appendix C, 2017 Traffic Impact Study, Chapter 3, Section Existing Traffic Volumes), the data for the 2017 Near-Term conditions was estimated. The estimation was done with a SANDAG computerized travel forecast model. "City Staff also accounted for all known and proposed development projects that were not otherwise accounted for in the model that would affect the study area … Poor model performance in the base year when compared to existing counts resulted in spot adjustments throughout the study area in both the "With" and "Without Project" scenarios." (Appendix C, 2015 Traffic Impact Study, Chapter 4, p. 24).

    - Why should any results of this model be trusted if the model already showed obvious poor performance in some predictions that required post-model adjustments? How can one affirm that the model predictions that are not obviously wrong are accurate?
    - What were the known and proposed development projects that were included in the model?
    - Are there any projects that weren't included?

- Near-Term 2017 baseline traffic conditions inaccurate: The Recirculated DEIR states "It is possible the project would not be built for some time and by using near-term conditions rather than existing conditions, the analysis better predicts what the conditions would be like into the future at a point when the project may be implemented." (Recirculated DEIR, 5.2) There are multiple major developments planned for the area (refer to Recirculated DEIR, Table 6.1) that can significantly impact the amount of traffic in Mission Valley, how can the report estimate a baseline into the future when traffic conditions are rapidly changing and authors don't know when the road would be built?

- Appendix C Traffic Impact Study for the Serra Mesa Community Plan Amendment Roadway Connection Project dated January 2017 differs from the Appendix C Franklin Ridge Road Connection Traffic Impact Study, dated January 2015. For example, in Appendix C (2017), p. 79; and in Appendix C (2015), refer to p. 54. Both of these tables are titled Significant Impact Comparison – Long Term (2035) vs. Existing Conditions (2012) and have the same header and footer (except for the page number) but some of the information on the page is different. The 2017 traffic analysis was conducted by a different company. There isn't any indicator on this page that this information was changed by another company. Has any significant data been changed? Also, the first company has a professional seal on their Traffic Impact Study. There isn't a seal for the second company. Discuss the significance of a seal and the lack of a seal.

- How does this data compare to what was predicted for the Quarry Falls Project, Phase 1?

- When the data was collected for the Traffic Impact Study did it consider the activities of City View Church? If not, will they be included? If no, provide an explanation for the exclusion.

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

- Methods and Assumptions –
    - Phase 1 of SR-163 and Friars Road Interchange Project is scheduled for construction in 2017. 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.
    - "…the cumulative impact analysis evaluates the long-term cumulative impacts projected to occur when the Serra Mesa Community Plan reaches full planned buildout, which is anticipated to occur by the year 2035." (5.2-18) Serra Mesa is impacted by all of the development in Mission Valley. What would be the results if the cumulative impact analysis included the long-term cumulative impacts projected to occur when the Mission Valley Community Plan reaches full planned buildout?

- Why wasn't the intersection of Mission Center Road and Sevan (located in Serra Mesa) included in the Traffic Impact 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.

- The freeway off-ramps weren't analyzed in the Traffic Impact Study. Provide an explanation for their exclusion.
- Sandrock Road became a two lane collector with a continuous center lane in 2014. Do the near-term conditions account for the change of Sandrock from four to two lanes? If not, will the analysis be revised? If it won't be revised, provide an explanation for the exclusion.
- 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 near-term and long term conditions? If not, will the analysis be revised? If it won't be revised, provide an explanation for the exclusion.
- The previous DPEIR included the roadway segment of Friars Road between River Run and Fenton Parkway. Explain why this segment has been removed from this Recirculated DEIR. (5.2.1.1)
- 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.
- Traffic generated by events at Qualcomm Stadium during event time wasn't included in the studies. Will it be included? If not, provide an explanation for the exclusion.
- 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.
- In Appendix G of Appendix C Traffic Impact Study, there are charts 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?
- Were the improvements/mitigations that are required for the approved Mission Valley projects included in the traffic analysis? If not, what would be the impact of these improvements/mitigations on the traffic analysis?
- This Traffic Impact Study has not studied as many road segments and intersections as in Final PEIR for the Quarry Falls Project, which studied the road connection as an alternative at that time. Provide an explanation for the difference in limiting the road study perimeters.

Data Analysis

- 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?
- I-805 NB Ramp
    - The ramp meter data on Table 5.2-18 doesn't include Murray Ridge I-805 NB Ramp (PM). However, it includes the I-805 SB Ramp (PM) 31 minutes delay In the KOA Corporation study the I-805 NB Ramp (PM) is displayed as 43 minutes delay. Explain why this data wasn't included in the analysis.
    - Table 7-4, Appendix C, Long-Term (2035) with the Connection – The data for I-805 NB ramp at Murray Ridge Road shows 43 minutes of delay (PM) and the I-805 SB ramp at Murray Ridge Road shows 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.

- For intersections with connection long-term "Franklin Ridge Road/Phyllis Place – LOS F (PM)" stated on page 60 of the KOA Corporation Traffic Impact Study contradicts Table 4-2 of the Chen Ryan study which indicates the LOS is B. Explain the contradiction.

- Inaccurate LOS in Table 5.2-8: According to Table 5.2-7 any V/C in the 0.9-1.00 range is designated LOS E (unacceptable). However, Table 5.2-8 cites LOS D (acceptable) on 3 of those entries: (1) Mesa College Dr on-ramp to SR-163 AM, V/C = 0.916, (2) SR-163 to Mesa College Dr on-ramp PM, V/C = 0.909 and (3) Murray Ridge Rd to I-8 PM, V/C = 0.903. While this LOS table is used only as a reference other LOS tables are not. Will this and similar mistakes in all LOS tables be corrected?

- Inaccurate LOS in Table 5.2.10: Phyllis Place between Abbotshill Road and Franklin Ridge Road is shown as LOS A in the Near-Term with Project, but it should be LOS F. Residents leaving the Abbotshill area will drive this segment and meet the next segment (Phyllis Place between Franklin Ridge Road and I-805 SB ramp) that has LOS F. With the next segment being congested cars will start lining up west on Phyllis Place back into the Abbotshill area, so Phyllis Place between Abbotshill Road and Franklin Ridge Road will effectively become an LOS F. Since Phyllis Place is the only road to exit the Abbottshill area, this creates a significant traffic hazard for that neighborhood. Will the LOS of Phyllis Pl between Abbotshill Rd and Franklin Ridge Rd be adjusted to show the actual expected level of service? If not, provide an explanation.

- Section 3.3.1.2 of the DEIR states that the proposed intersection will be a signalized intersection. What is omitted is if the signal will have a pedestrian capability. It might be assumed that it does since it has crosswalks. The addition of crosswalk signaling on the traffic flow is not analyzed although it seems to be implied. The distance between the proposed intersection with Phyllis Place and the signal light at the I-805 SB ramp (the west end of the bridge) is about 650 feet. This distance is less than the worst case queue length of 3,112 feet as listed in Table 5.2-12. This can effectively lock out Phyllis Place residents from getting on to the I-805 SB ramp unless the lights are synchronized and there is a "No Right Turn on Red" implemented at the light to prevent keeping the queue full from cars coming up through the Franklin Ridge Rd connector. Will this be addressed in the traffic analysis? If not, provide an explanation for the exclusion?

Vehicles Miles Traveled Data (VMT)

- Project Influence Area
    - Explain how Traffic Analysis Zones are determined. Is the increase or decrease in ADTs on freeway mainline segments, roadway segments, and/or freeway ramps considered?
    - According to Appendix H (p. 3 of 8) SANDAG Series 12 ADT was used to determine the project influence area by comparing the Year 2035 with Project conditions to Year 2035 without Project conditions. Incorrect information in the SANDAG Series 12 Data, Forecast Year 2035 at the Transportation Forecast Information Center includes:
        - Sandrock Road is classified as 4 lanes but was restriped as two lanes.
        - Murray Ridge Road is classified as 4 lanes but was restriped as two lanes.
        - Franklin Ridge Road south of the Via Alta/Franklin Ridge intersection isn't included.
        - Franklin Ridge Road segment between Phyllis Place and Via Alta (street name is misidentified as Murray Ridge), which isn't approved, is shown; inclusion of a road can't be based on information from a community plan because the extension of Tierrasanta Boulevard (shown in their community plan) isn't shown on the map.

      Why does SANDAG have inaccurate information? Explain why the unapproved Franklin Ridge roadway connection has been included in the data, but not the Franklin Ridge Road section from the Via Alta intersection to Civita Boulevard?

Was the above inaccurate information used for the VMT analysis? If affirmative, what would be the impact of the corrected information on the VMT analysis?

- If it includes roadway segments, the project influence area doesn't include all of the roadway segments in Serra Mesa which would increase or decrease by more than 500 ADTs that are identified in the Traffic Impact Study.
  - Explain the inconsistency in the data.
  - Will the VMT study be rerun to include the excluded roadway segments and the evaluation included in this Recirculated DEIR? If not, why not?
- The Project Influence Area doesn't include the same area that was studied in the Traffic Impact Study (e.g., excluded Qualcomm Stadium area). Discuss the inconsistency between the data used for the Traffic Impact Study and the data used for the VMT study.

- Table 1 (Appendix H)
  - Data is provided for 2013, Near Term (2017), and Long Term (2035). How was the data obtained for 2013, 2017, and 2035?
  - If the 2013 data was used for a baseline, does the 2017 data include the development that has occurred since 2013?
  - If the 2013 data was used for a baseline, does the 2035 include all of the proposed and/or approved Mission Valley developments?

- The Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, "Building new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, *typically induces additional vehicle travel*. For the types of projects indicated previously as likely to lead to additional vehicle travel, an estimate should be made of the change in VMT resulting from the project." (p. III.32, emphasis added)
  - Based on the above, why does the Recirculated DEIR suggest that the proposed road connection will decrease VMT from its baseline level?
  - What was the basis for the "Baseline" VMT fed into the CARB's EMFAC model output as shown by Table 5.10-4 in the Recirculated DEIR? What relevance does that number have to the known VMT levels in the regions affected by the proposed road connection?
  - On what basis -- other than the programming of the EMFAC model -- is the proposed road connection expected to reduce (rather than increase) VMT in affected regions? What verified and validated estimates of either baseline VMT or expected extent of changes in VMT (if any) are available?

- Induced VMT

  Proposed project contradicts Senate Bill No. 743: The project's new road and the mitigations proposed in this Recirculated DEIR will only partially help traffic flow in the short term. "Ironically, even "congestion relief" projects (i.e., bigger roadways) may only help traffic flow in the short term. In the long term they attract more and more drivers (i.e., induced demand), leading not only to increased air pollution and greenhouse gas emissions, but also to a return to congested conditions." (Updating Transportation Impacts Analysis in the CEQA Guidelines, Senate Bill No. 743, p. 5)

  Discuss the contradiction between Senate Bill No. 743 and the roadway connection.

  Discuss how the roadway connection will provide a sustainable solution to the traffic issues currently suffered by Mission Valley and additionally new ones in Serra Mesa.

The Recirculated DEIR states "By providing a new roadway connection, the project may affect future vehicle circulation on local roadways and freeways, as motor vehicle would reroute their future trips based on the new roadway connection. As such, the new roadway connection would introduce new trips to the project area that currently use an alternative route, thereby affecting, and potentially reducing, traffic volumes on existing surrounding roadways." (5.10.3.2)

Serra Mesa is known as a pass through community – people use Serra Mesa roadways to reach other areas (e.g., Kearny Mesa, I-805, Mission Valley). Here are a few examples:

- Since there isn't access to I-805 N from the hospital complex in the Birdland area, there are employees who travel on I-805 S, exit at Murray Ridge, go across the bridge on Phyllis Place in Serra Mesa, and access I-805 N.
- People employed at the state building on Metropolitan Drive in Mission Valley access I-805 via Mission Center Road, Murray Ridge Road, and Phyllis Place or I-15 or Kearny Mesa via Mission Center Road, Murray Ridge Road, and other local streets (multiple routes available).
- People traveling to stadium events use I-805, exit Murray Ridge, and travel the other local streets (multiple routes available) in Serra Mesa to reach the stadium.
- To avoid Friars Road congestion people travel Mission Center Road and the local streets in Serra Mesa to reach their destination (e.g., I-805, Kearny Mesa, I-15, Tierrasanta, etc.).

The Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA states that

- "With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT..." (p. III:28) The changes which are applicable to the roadway connection include longer trips and route changes. Refer to the Texas Street example under Impacts in this letter.
- "Induced VMT has the potential to reduce or eliminate congestion relief benefits, increase VMT, and increase other environmental impacts that results from vehicle travel." (p. III:34)

The roadway connection could potentially result in Induced VMT. Refer to Appendix H: E/E VMT wasn't included in the total VMT.

Discuss the impact on VMT if vehicles drive north from Mission Valley via the Franklin Ridge roadway connection to access I-805 SB. Will these vehicles add more miles to their trip than without a roadway connection?

In relationship to the discussion in this VMT section:

- Does E/E VMT refer to Induced VMT?
- If not, was an analysis made of Induced VMT?
- If affirmative, what method was used?
- If not, what would the result be if induced VMT were included?
- Considering the discussion and evidence for including Induced VMT, will it be included in this Recirculated DEIR? If it won't be included, provide an explanation for the exclusion.

Mitigations

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?

These mitigations have for the most part the same description: MM-TRAF-1 and 9; 2 and 10; 3 and 11; 4 and 12; 5 and 15; 6 and 16. Why are there different mitigation designations for the same mitigation description? It's confusing!

MM-TRAF-1 and MM-TRAF-9, Murray Ridge Road from Mission Center Road to Pinecrest Avenue, was addressed and resolved in the Final PEIR for the Quarry Falls Project, certified by the City Council. Explain why it's appropriate to reintroduce this mitigation.

In 5.2.4.3 and 6.3.2.5 the mitigation for MM-TRAF-3, Phyllis Place from Franklin Ridge to I-805 SB ramps, states Phyllis Place shall be widened. This differs from the statement MM-TRAF-11, Phyllis Place from Franklin Ridge to I-805 SB ramps, which states that Phyllis Place shall be reconfigured. There's a contradiction. Which is the correct statement? If reconfigured is being proposed, discuss the width of the road.

MM-TRAF-4 and MM-TRAF-12 indicates that "Phyllis Place shall be restriped from I-805 SB ramps to I-805 NB ramps to accommodate a total of five lanes. The new classification for this segment of Phyllis Place will be a four-lane Collector." (p. 5.2-27 and p. 5.2-40, respectively) However in the Executive Summary section MM-TRAF-4 and MM-TRAF-12 are each classified as a Major Arterial (p. S-6 and S-9, respectively). Will the discrepancy be corrected?

MM-TRAF-5 and MM-TRAF-15 lack a specific description of the proposed restriping and widening of the NB on-ramp approach. Provide a detailed description.

MM-TRAF-6 and MM-TRAF-16 lack a specific description of the widening of approaches. Provide a detailed description of the SB ramps.

Table 10-8 in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan With Phyllis Place Road Connection:

- Which mitigation(s) in the Recirculated DEIR are ones that are not listed in Table 10-8?
- Are there mitigations listed in Table 10-8 but not considered in the Recirculated DEIR that would impact traffic congestion? Were these traffic improvements considered in the traffic impact analysis? If not, provide an explanation for not including them in the analysis.

Table 11-1 in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan (without roadway connection):

- Which mitigations won't be completed and/or be the responsibility of the developer if the roadway connection is approved?
- When the traffic analysis was conducted did it include the identified mitigations that won't be completed and/or be the responsibility of the developer? If it included them, what would be the impact on the analysis if they were excluded?

Impacts

The City Council Resolution 304295 (October 2008) for the Quarry Falls Project includes this statement: "Encourage the use of public transit modes to reduce dependency on the automobile." (p. 3 of 28) How does a roadway connection whose main purpose is to provide access to I-805 fulfill the finding to reduce dependency on the automobile?

The statement is made that "…and provide for a more efficient, integrated circulation network for Serra Mesa and Mission Valley, that would improve access in the area."

- 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 that there will be added traffic in Serra Mesa. Explain how efficiency and accessibility would improve with the added traffic.

- This Recirculated DEIR 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.

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.

The data indicates with the roadway project that the delay at the Mission Center/Murray Ridge intersection will improve and the ADTs for the segment of Mission Center Road from Aquatera Driveway to Murray Ridge will decrease (the LOS remains F without and with the project). The data didn't consider the required improvement to Mission Center Road from I-805 to Murry Ridge Road that's described in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan (p. 11-5), if the roadway connection is not approved.

- In the Recirculated DEIR it's indicated that the mitigation measure to widen Mission Center Road from Aquatera Driveway to Murray Ridge Road is unlikely and the impact considered significant and unavoidable. Was a structural evaluation made by either a City engineer and/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. The mitigation for widening Mission Center Road between the I-805 bridge and Murray Ridge Road was not deemed unlikely in the Final PEIR for the Quarry Falls Project.

- How much MHPA area would be impacted by the widening of Mission Center Road from I-805 to Murray Ridge? There wasn't any discussion of an impact on MPHA for the Mission Center Road widening in the Final PEIR for the Quarry Falls Project.

- If it is feasible to widen Mission Center Road, what would be the LOS condition for the Murray Ridge/Mission Center intersection without the roadway connection but with the improvements? If this data isn't included, provide an explanation for the exclusion.

The impacts of each of the mitigations have not been studied. Will mitigation impacts be studied? Here are some examples:

- Discuss the impacts of widening the NB on-ramp (MM-TRAF-15) and the widening of the EB approach, SB on-ramp, SB off-ramp (MM-TRAF-16).

- There isn't any discussion on the impact of the roadway connection on existing parking spaces. A 1.3 acre park without a parking lot will be constructed next to the roadway 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.

- Bikes
    - If the roadway 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.
    - 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.

- It's indicated that Phyllis Place from the I-805 SB ramp to the I-805 NB ramp "shall be restriped to accommodate a total of five lanes." (Refer to Addendum, p. 11-12)
    - The California Log of Bridges on State Highways, p. 52 of 71, indicates that the width (referring to out-to-out width) of the bridge is 24.4 m (80.05 feet). What is the width from curb to curb of the bridge?
    - Will there be bike lanes on the bridge?
    - According to the City's Street Design Manual, p.45, a four lane major street with bike lanes and center median requires 76 foot curb-to-curb. What would be the width of 5 total lanes? What would be the width of 5 total lanes and bicycle lanes?
    - The state's Highway Design Manual indicates that "The minimum width of a bridge sidewalk shall be 6 feet." (p. 200-41) Will the design include 6 feet sidewalks on both sides of the overcrossing?
    - Provide a diagram showing the bridge 5 lane configuration. If not, provide an explanation for the exclusion.
    - Will the overcrossing meet the required state highway design manual? If not, explain any design exceptions.
    - Since the bridge will be restriped to add additional lanes 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.
    - Will the reconfigured road meet the City's design standards? If there are any exceptions, what are they?
    - In the Final PEIR for the Quarry Falls Project Transportation Phasing Plan, #8b Murray Ridge Road Bridge over I-805, it states "Prior to the issuance of any building permits for Phase 1, the applicant shall assure by permit and bond the restriping of Murray Ridge Road/Phyllis Place, between the northbound and southbound ramps to I-805 ramps, to 5 lanes, satisfactory to the City Engineer." (p. 11-4) The Murray Ridge Bridge, as viewed in the p. 10 of the Addendum, shows 4 lanes and Civita (Quarry Falls) has been issued building permits.
        - Provide an explanation for the non-implementation of this improvement.
        - If implementation isn't possible for any reason, will this item be removed as a mitigation measure?
        - If it is removed, discuss the impact of the removal on the analysis?
    - The City has embraced Vision Zero: No loss of life is acceptable. One of the focuses is engineering safe street design.
        - With the roadway connection ADTs will increase from 10,770 (existing) to 24,037 (long term) and ramps will be widened. Discuss this impact of increased traffic and widened ramps on pedestrian safety and in relationship to Vision Zero.
        - Without the roadway connection ADTs will increase from 10,770 (existing) to 14,570 (long term). Will there be less of an impact on pedestrian safety with the connection versus without the connection?
- The statement is made "…Phyllis Place shall be widened from Franklin Ridge to I-805 SB to accommodate 5 total lanes…" and that it would be designated as a five lane major arterial. What is a major arterial? Is it the same thing as a primary arterial? The street design manual describes six lane primary arterials and four lane major roads.

- How wide is a 5 lane major arterial? Provide the physical dimensions for Phyllis Place. Phyllis Place is not wide enough (approximately 40 feet wide) to reconfigure to 5 lanes.
- How many feet need to be added to make this a major arterial?
- Would bike lanes be added?
- Would sidewalks be added?
- Include a cross-section of the 5 lane design.
- Discuss the impacts of widening. Would widening Phyllis Place impact the approved park?
- There are two curves – one located west of the City View Church's western driveway to the single family residences and one located east of the City View Church's eastern driveway to I-805 ramps. It's mentioned in sections 3.3.1.2 and 5.2.6.1 that there's a "slight curve along Phyllis Place from the I-805 ramps". This curve is not slight. What is the radius of each of the curves? (Refer to Addendum, p. 8)
- A roadway connection increases the ADTs on Phyllis Place to 34,540 (2035).
    - This applies if Phyllis Place will be designated as a primary arterial. According to the Street Design Manual a primary arterial is described as "A street that primarily provides a network connecting vehicles and transit to other primary arterials and to the freeway system. It carries heavy vehicular movement while providing low pedestrian movement and moderate bicycle and transit movement. It has a raised center median, bicycle lanes, street trees, traffic safety street lighting, sidewalks, and no access from abutting property." (p. 126) Also, it's stated that "Should a lot have frontage only on a primary arterial, driveway access limited only to right turns in and out will be permitted at locations and under conditions specified by the City Engineer and may require an additional lane. (p. 122)
        - If either bike lanes or sidewalks aren't being added to Phyllis Place, discuss how this mitigation would fulfill the project objectives and meet the description of a primary arterial?
        - City View Church is an abutting property with access. Discuss the contradiction with the description of a primary arterial.
        - Will vehicles exiting City View Church be required to make a right turn only? If so, this will greatly impact the residential area located west of Phyllis Place unless the vehicles are allowed to make a U-turn at the Franklin Ridge/Phyllis Place intersection.
- Discuss this mitigation in regards to meeting the project objectives:
    - "Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts." Given the blind curve and downhill travel of westbound vehicles from the I-805 southbound off-ramp, discuss how a safe transportation system will be created on Phyllis Place when the ADTs increase from 2,420 (existing) to 34,540 (2035).
    - If bike lanes and sidewalks are not being included, provide a discussion regarding "Improve local mobility…"

- "…the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient." (5.2.6.1) In reference to MM-TRAF-19, relocating the City View Church driveway, "…this analysis assumes that the mitigation measure would not be implemented." (8. 1.1)

- If MM-TRAF-19 isn't implemented, would the project meet the project objective to "Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts."?
- Since MM-TRAF-19 is located on private property discuss the procedure for and cost of implementing the mitigation.

Will the above items be added to the Recirculated DEIR and discussed in the appropriate area? If not, provide an explanation for the exclusion.

A dog park is located at the top of Via Alta. Will it be a safe place to walk dogs and cross the street with close to 21,000 cars a day?

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.

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.

	2035 Peak Flow in Vehicles/Hour		
Time	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 Recirculated DEIR (e.g., impacts)? If not, provide an explanation for the exclusion.

For each of the mitigation measures, indicate who will be the responsible party – cost and implementation.

The state CEQA Guidelines define feasibility as "capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations." (p. 5.3) Of the 19 mitigation measures listed:

- 8 of the measures (MM-TRAF-1, TRAF-2, TRAF-8, TAF-9, TRAF-10, TRAF-13, TRAF-14, TRAF-19) include this statement: "Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable." In six of these mitigations the footnote in Table ES-1 indicates that these mitigations would conflict with the City's land use and mobility policies. Consequently, the statement implies that these mitigations may never be completed.

The information that is listed under these 6 mitigations does not include the complete statement that is listed in very small print in the Table ES-1 footnotes, p. 31-32. For example, "[1]Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable." The cited statement explains what is meant by countervailing considerations and why implementation is unlikely. While Footnote 2, 3, and 4 are worded a little differently, the same is true for them. *The entire statement from the footnote should be included in the description for each of these 8 mitigations. If it isn't included, provide an explanation.*

- 6 of the measures describe at least one street/ramp that needs widening (MM-TRAF-3, TRAF-5, TRAF-6, TRAF-7, TRAF-15, TRAF-16) Any widening project will be costly and may never be completed.
- 1 of the measures (MM-TRAF-18) requires a fair share contribution for an additional ramp lane, probably costly.
- 3 of the measures (MM-TRAF-4, TRAF-11, TRAF-12) are restriping projects and could be more easily completed.
- 2 of the measures (MM-TRAF 15 and TRAF-16) provide only partial mitigation; these mitigations are listed as Significant and Unavoidable.

Consequently, 8 of the measures may never be completed. 7 measures are going to be costly. 3 out of the 19 could be completed, and 10 of the measures are listed as Significant and Unavoidable. Will a chart analyzing the feasibility of the mitigations be included?

The following statement is used with eight of the mitigations: "Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable." Does this mean that these eight mitigations weren't used in determining the data for "with project with mitigations" charts? If the mitigations were included, will another chart be added that shows "with project with feasible mitigations"?

The statement regarding necessary emergency access points (p. 5.1-19) contradicts the following statement: "There is 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." (p. 5.2-48) Explain the contradiction.

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 at least one trail is required to be constructed with bicycle and pedestrian access. Discuss the roadway connection in relationship to the Climate Action Plan.

Currently, numerous vehicles of residents of Civita create parking problems by encroaching and using up already limited space for the local residents. The roads impacted are: Ainsley Road, Ainsley Court, Polizzi Place, Kaplan Drive, Harton Road and Harton Place. The possible reasons are Civita residents using their garages for storage, convenience or easier to park on the street rather than parking on their project streets, too many vehicles with insufficient parking within Civita, and/or vehicles too large for their garage. A roadway 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.

"Would the project substantially alter present circulation movements include effects on existing public access to beaches, parks, or other open space areas?" (5.2.7.2) The roadway connection has the potential for altering circulation movement by encouraging vehicles to travel through Serra Mesa for access to I-805 and Kearny Mesa. Discuss the change in circulation.

Community Access – 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

- 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 wrong in one row 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 roadway 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 8, Bus Service, p. 71, 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 section 5.2.8.3? If not, provide an explanation for the exclusion.

Air Quality

The Air Quality Report uses the baseline weather data from Lindbergh Field, located about 8 miles from the site of the roadway connection. 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.

Can a baseline sampling be conducted at key areas (e.g., Franklin Ridge Road segment, City View Church, Faith Community Church, Hye Park, corner of Murray Ridge/Mission Center)? If not, provide an explanation for rejecting the request.

The ADTs on Phyllis Place will increase from 2,420 (existing) to 34,540 (2035). The construction of the roadway connection would concentrate vehicle trips in a specific area on a steep street.

- What is the maximum grade of the roadway 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 for the exclusion.
- Would emissions collect at Phyllis Place (e.g., winds blowing up the hill), located across from retirement/Senior units? If there's a possibility of emissions collecting, will it be discussed, studied, and added? If it won't, provide an explanation for the exclusion.

Vehicles (including diesel delivery trucks, especially from the retail area of Civita) will be queuing on a roadway connection with a steep grade.

- Was an air pollution analysis of this area conducted? If this information won't be included, provide an explanation for the exclusion.
- Can tractors, trailers, and buses be restricted from the roadway connection?

The sensitive receptors are 56 retirement/Senior units located approximately 300 feet from the roadway connection, a public park to be constructed next to the roadway connection, and Elevate Elementary School at Faith Community Church. (Refer to Addendum, p. 9) Additionally, there may be a school at Via Alta. The Significance Determination Thresholds states that "If sensitive receptors are involved, the more restrictive of the guidelines should be applied." (p. 7)

- 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.
- Will a hotspot analysis be conducted? If not, give an explanation for its exclusion.

This section indicates that the proposed CPA for a roadway connection would not include trip-generating uses but 4,780 residential units and 900,000 s.f. of commercial and office are being built at Civita, and it will redistribute traffic from Mission Valley to Serra Mesa. CPA which is specific to Serra Mesa creates additional traffic in Serra Mesa. The analyses show that the number of trips will increase at specific roadway segments and intersections. Will the air quality impacts for Serra Mesa from trip generating redistribution be included in this section?

The construction of the roadway connection would concentrate vehicle trips in a specific area. The Traffic Impact 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.

There's a school and preschool located at Faith Community Church. Was an analysis of the impact of the air pollution caused by queuing and the atmospheric conditions (i.e., winds blowing west to east) on the school and preschool made? If not, provide an explanation for not conducting an analysis.

The site for the roadway 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."

The City recommends that a quantitative analysis of CO hotspots be performed where roadways deteriorate to LOS D or worse and if a proposed development is within 400 feet of a sensitive receptor. Mission Center Road from Aquatera to Murray Ridge Road segment will change from LOS E (existing) to LOS F (2035) with and without the connection. Will an analysis of this roadway segment be added? If not, provide an explanation for the exclusion.

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 (2035) with the connection and 23,850 (2035) 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 for the exclusion.

If it's determined that any of the Traffic Impact Study needs revising and/or new traffic studies are conducted, would this impact the air quality analysis? If affirmative, which areas?

The site of the roadway connection will change from a plant covered terrain to a hard surface roadway. Will the replacement of plant material with a hard surface have any impact on air quality?

Noise

Study and Site Selection

- There were more noise measurements made in Mission Valley than in Serra Mesa. Why wasn't a measurement made in the residential area at the western end of Phyllis Place?
- 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.
- 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 roadway connection as shown by the Traffic Impact Study – along Murray Ridge Road and Sandrock Road be added to the noise study? If not, provide an explanation for the exclusion.
- Include the maximum measurements of noise and their frequency or provide a reason for their exclusion.
- Provide the standard deviation for the noise measurements or a reason for their exclusion.
- Noise was analyzed using the data from the Traffic Impact Study. If the Traffic Impact Study data is inaccurate, will the noise study be redone?

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 roadway connection and without the roadway 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 Recirculated DEIR be corrected?

- Why isn't the increase in the noise level the same for R5 (Residential adjacent to Phyllis Place) and R6 (Church adjacent to Phyllis Place) since these two areas appear on the map to be equally distant from the roadway connection? If this conclusion is incorrect, will the appropriate areas of the Recirculated DEIR be corrected? If elevation accounts for the difference in the noise level, would there be an increase in the noise level in the residential areas west of R5 (since this area has a lower elevation)?

- 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.

- Vehicles (including diesel delivery trucks, especially from the retail area of Civita) will be queuing on a roadway 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.
    - "Designate local truck routes to reduce truck traffic in noise-sensitive land uses areas." (Noise Element, NE-9) Can tractors, trailers, and buses be restricted from the roadway connection?

- "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/Senior homes, church, and single-family dwellings. (Refer to Addendum, p. 9)

- The data for R11 – Residential adjacent to Via Alta is listed as 60 for existing but reduced to 57 for near-term baseline. Why would the sound level decrease?

- The data for R-11 – Residential adjacent to Via Alta is listed as 60 for existing and for near-term with project. With the project there will be more traffic on Via Alta. Why doesn't the sound level increase?

- 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 Recirculated DEIR. If the 72 CNEL is the actual noise level, will this Recirculated DEIR 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-10) The area of the roadway connection in Serra Mesa is zoned for single family dwellings and there will be single family units in the Civita area of the roadway 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 roadway connection in regards to the cited Noise Element guidelines and attenuation measures.

Why would the dBA CNEL increase long term with the project versus without the project at site R2 (Residential adjacent to Mission Center Road north of Friars Road)? If more vehicles will be using the roadway connection, the noise level should logically decrease.

The site of the roadway connection will change from a plant covered terrain to a hard surface roadway. What effect does the hard surface have on noise propagation? Was the road surface considered during the noise analysis?

According to CEQA Guidelines, Article 9,15131 (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 roadway connection on the religious practices of City View Church and of Faith Community Church? If affirmative, 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.

Biological Resources

The Biological Resources Letter, Appendix F, p. 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."

- Refer to Figure 5.5-1 which indicates a 100-foot buffer encompassing the area of potential effect of a future roadway." Is this 100-foot buffer the same as the 150-foot buffer referred to in the letter? Provide the analysis documentation.
- If the roadway 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 and 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 roadway connection, will changes to the stormwater drain system be required? If affirmative, provide a description of the changes, impacts, costs and the responsible party for the costs.

Visual Effects and Neighborhood Character

Some of the 56 retirement/Senior homes at City View Church have windows that face Phyllis Place. Were studies conducted to determine the impact on these homes of 1) vehicles traveling at night on the roadway connection with headlights on, 2) lights at night from street lights, and 3) light from the traffic signal at the intersection? If there is an impact, discuss mitigation measures. If a study wasn't conducted, will one be conducted and if needed, mitigations discussed?

Phyllis Place is the only roadway in and out of the neighborhood for the 56 multifamily retirement/Senior units located at City View Church as well as for the Abbotshill area. (Refer to Addendum, p. 9) The roadway 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" (5.9.4).

The Steep Hillside Guidelines states "The recommendations came directly from the indicated Community Plan and conformance is required in order to make the findings for development approval" (p. 41). Stated for Mission Valley is "Orient development towards the valley and take access to Mission Valley projects from roads that do not extend above the 150-foot elevation contour." (p. 42 and Recirculated DEIR, 5.9-7) Franklin Ridge Road will be above the 150-foot elevation contour. While the Recirculated DEIR mentions the 150-foot elevation contour requirement, it isn't discussed in the impact analysis. Include a discussion of conformance with this policy or provide an explanation for the exclusion.

"Would the project result in (2) the creation of a negative aesthetic site or project; (3) substantial alteration to the existing or planned character of the area…" (5.9.5) Two park designs (one with the roadway connection and one without the roadway connection) have gone through the design approval process and the subsequent Park Development Agreement, p. 2, requires construction of the park. If the roadway connection was approved, the street would run through the park dividing it in two and Phyllis Place would be widened. Additional land will be needed for the park and for the road widening.

- Would the view from the park be impacted?
- Will the view from the bisected eastern portion of the park be the roadway connection on the west side and south side?

Will this information be included? If not, provide an explanation for the exclusion?

The park will be bisected by a roadway with 34,117 ADTs (2035) and will create a negative aesthetic, substantially altering the planned character of the area – Phyllis Place Park.

Phyllis Place will be changed from two lanes to five lanes (a major arterial) and the roadway connection will be four lanes. A huge traffic increase into a residential community brings with it by definition additional safety and quality of life issues (noise, accidents, parking, and pollution, for example).

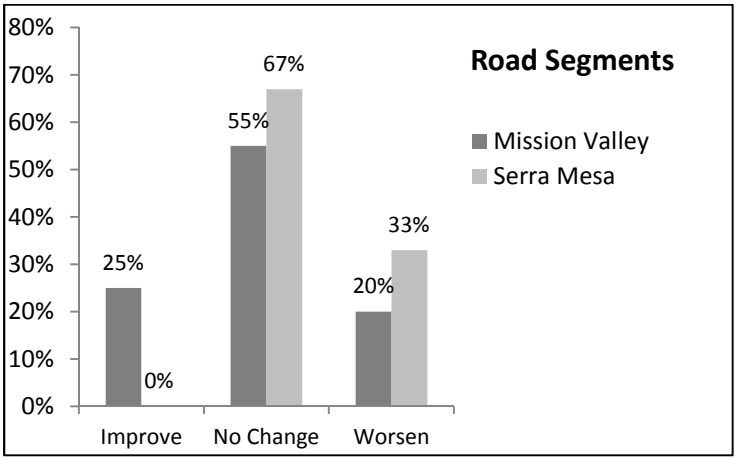
- Discuss how this would not strongly contrast with the surrounding topography.
- The Significance Determination Thresholds states "Note: for substantial alteration to occur, new development would have to be of a size, scale, or design that would markedly contrast with the character of the surrounding area." (p. 75) Discuss how this would not be a change in scale in comparison to the low density housing residential zoning.
- 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.

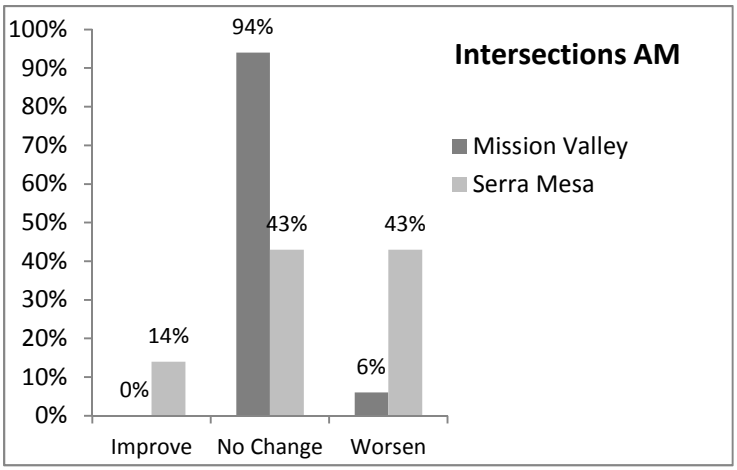
Cumulative Impacts

As shown in the analysis listed below the roadway connection long-term cumulative doesn't alleviate congestion for both Serra Mesa and Mission Valley and increases congestion in Serra Mesa, especially at freeway ramps.

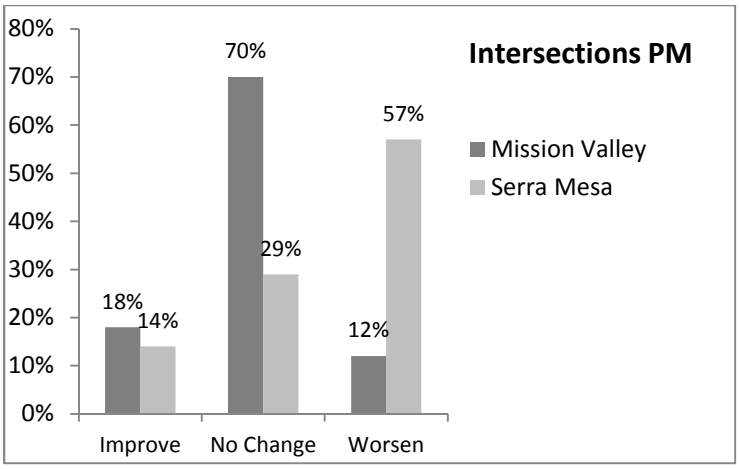
Analysis of the LOS Level Long-Term Baseline vs Long-Term Cumulative with Project - These charts are based on Tables 5.2-16 and Table 5.2-17. Analysis worksheets are in the Addendum, p. 5-8.



In both Serra Mesa and Mission Valley the greatest percentage of the roadway segments will receive the same LOS level. Also, in Serra Mesa one-third of the segments will worsen and none will improve.



The LOS No Change is almost 100% percentage for Mission Valley while in Serra Mesa both No Change and Worsen receive the same percentage.



In Mission Valley 70% of the intersections won't change LOS level while in Serra Mesa more than half of the intersections will worsen.

Conclusion: The road connection won't help most of the roadway segments and intersections in Mission Valley and will worsen ones in Serra Mesa.

On-Ramps for Long-Term Without the Roadway Connection in Comparison to With (refer to Table 5.2.18)

- Murray Ridge I-805 NB on-ramp AM delay increases 9 min; queueing from 0 to 3,886 ft (.74 mi).
- Murray Ridge I-805 SB on-ramp PM delay increases 31 min; queueing from 2,407 to 10,368 ft (1.96 mi), beyond Sandrock.

6 Cumulative Impact Analysis

- Refer to 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.
- Refer to 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.
- Refer to 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.
- Refer to 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.
- Refer to 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.
- Refer to Hydrology and 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.
- Refer to 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.

6.2 List of Cumulative Projects –

- Is this table up-to-date as of March 2017?
- There are some projects in Grantville/Allied Gardens (e.g., River Park and Centrepoint).
- There is a proposal to redevelop the Qualcomm Stadium site. People attending events use Serra Mesa streets to travel from I-805 to the stadium.
- Can development occur along Mission Center Road from Aquatera to Murray Ridge Road? (A property owner has contacted the Serra Mesa Planning Group about changing the zoning.) If so, what would be the impact?
- Is the Mission Village Shopping Center redevelopment project included in the 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.

Effects Not Found to be Significant

Health & Safety regarding adopted emergency response plan or emergency evacuation plan: Emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa. This access provides for bicycle and pedestrian access and linkages. Does an evacuation plan exist for this site? Also, the developer will provide a minimum of one trail connection between Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Refer to Addendum, p. 13) Discuss the impact a roadway connection which creates more congestion near the freeways will have on an adopted emergency plan at Kaplan/Aperture Circle if it exists or were developed.

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.

Fire Rescue Services – There is an existing emergency access between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.

- Will this information be included in this section? If not, provide an explanation for the exclusion. If so, provide documentation.
- Has the Fire-Rescue Department specifically stated that they support this roadway connection?
- Was an analysis conducted to determine the difference in response time using the roadway connection versus using the Aperture Circle/Kaplan Drive access that already exists? Is the difference in response time significant?

Natural Gas

- 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.
    - High Pressure Gas Line
        - Will the construction of the roadway connection and/or the widening of Phyllis Place impact the gas line? Will relocation be needed? What are the risks to the gas line during roadway construction and/or, if required, during relocation?
        - With the increase in traffic on Phyllis Place will the high pressure gas line located in that area be impacted by the 1) load on top of the pipe and/or 2) weight? Was an analysis conducted of the risk for failure from vibrations?

Mandatory Discussion Areas

Significant Effects Which Cannot Be Avoided – 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 will have a significant effect, will this section be updated? If not, provide an explanation for the exclusion.

Alternatives

Selection of Objectives: The General Plan and Community Plan Amendment Manual, p. 5, 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 (October 2008) 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

If these objectives had been used, as required by the City Council as the project's objectives instead of the objectives selected by staff/management in the studies and the analyses, what would be the conclusion for each alternative?

Table 9-1. Summary of Significant Effects of the Proposed Project doesn't list: Results in a negative aesthetic site or project and Results in substantial alteration to the existing or planned character of the area. Refer to the discussion in this letter under Visual Effects and Neighborhood Character. The project is a roadway creating an increase in ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place and bisecting a planned park. The alteration is permanent and substantially changes the character of the area – creating a significant impact to the community. If this information were considered, what would be the impact?

Alternatives Considered but Rejected

No Build/Remove from Mission Valley Community Plan Alternative - "This alternative is rejected because it would not meet any of the project objectives…" doesn't consider the following:

1. Resolve Community Plan Inconsistency by Providing Multi-modal Linkages
    - Mission Center Road provides multi-modal linkage from Civita Boulevard to Murray Ridge.
    - A minimum of one trail for pedestrian and bike access between Civita and Phyllis Place Park is mandated with or without the road.
    - Pedestrian, bike, and emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.
2. Improve Local Mobility – In addition to the items listed in #1, consideration is not given to the
    - Gridlock that will occur long-term at peak hours on Murray Ridge Road with vehicles accessing I-805. This gridlock will limit the mobility for the residents of the 200+ single family dwellings and the 56 retirement/Senior homes west of Franklin Ridge.
    - Required improvement to Mission Center Rd, if the roadway connection isn't approved.
3. Alleviate traffic congestion and improve navigational efficiency between Serra Mesa and Mission Valley
    - Options exist with Mission Center Road and Mission Village Drive.
    - Alleviate traffic congestion – Refer to bar chart analysis in this letter that shows the roadway connection for the most part does not alleviate traffic congestion in Mission Valley and worsens the congestion in Serra Mesa.

4. Improve Emergency Access and Evacuation – Emergency access exists between Kaplan Drive in Serra Mesa and Aperture Circle in Civita.

5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

   Under Traffic Hazards (5.2.6) it's stated that "Therefore, the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient. Impacts related to traffic hazards would therefore be potentially significant (Impact TRAF-19), and mitigation is required."

   Also, in this same section is the following comment "However, as City View Church is privately owned, it is assumed for purposes of this analysis that the driveway would not be realigned as part of the proposed project." Additionally, it's stated "However, this analysis assumes that the mitigation measure would not be implemented. Therefore, impacts would be significant and unavoidable." (5.2.6.1)

   The City's analysis indicates that Franklin Ridge Road will create an unsafe situation that is "significant and unavoidable." Given the situation described in this document, explain how this situation meets the objective to create a safe design and discuss liability issues regarding this unsafe situation. Also, refer to the other sections of this letter that describe environmental and neighborhood impacts.

Explain how these objectives are met when the information described in the response for each objective is considered.

"…For example, the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended." (9.4.1.2)

- Climate Action Plan
  - Cite the reference in the City's Climate Action Plan that describes this assumption and specifically mentions a roadway connection from Serra Mesa to Mission Valley.
  - Are there other assumptions that were made in the Climate Action Plan that will require additional analysis (e.g., removal of the Regents Road Bridge from University City planning area)? What is the process that they went through for removal?
- Cite the reference in the Bicycle Master Plan that describes this assumption and specifically mentions a roadway connection. A *proposed* Class II bike lane for the roadway connection is shown in Figure 6-2 of the plan. There will be a bike path from Civita to Phyllis Place Park with or without the roadway connection. Since the Class II bike lane is listed as *proposed* what would require updating in the Bicycle Master Plan if the roadway connection wasn't approved?
- The Mission Valley Community Plan is in the process of being updated. Will an environmental analysis be needed for this community plan update process? Could the removal of the roadway connection from the Mission Valley Community Plan be made during this update process?

The analysis doesn't mention that there are inconsistencies in the Mission Valley Community Plan that would require community plan amendments. Will these inconsistencies be added and discussed?

- 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.

- "Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour." (p. 124)

This alternative meets most of the objectives cited for the project and is feasible and should have been considered. Will this alternative be considered?

Analysis of Alternative 1 - No Project Alternative

Many of the issues that were discussed in the No Build/Remove from Mission Valley Community Plan Alternative section apply to this No Project section.

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.

"…Therefore, land use impacts associated with the No Project Alternative would be significant and greater than land use impacts that would result from 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"?

Conclusion – The following information was not included or discussed in this Recirculated DEIR:

Emergency access exists between Aperture Circle in Civita and Kaplan Drive Serra Mesa.

The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access and linkages. (Refer to Addendum, p. 10)

The developer will provide a minimum of one trail connection for pedestrians and bikers between Phyllis Place Park and Civita in Mission Valley. (Refer to Addendum, p.13)

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.)

- If the mitigations that will probably not be implemented are considered, what would be the outcome?

Air Quality – 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.

The No Project Alternative would meet most of the objectives. Refer to the discussion in this letter for No Build/Remove from Mission Valley Community Plan.

Analysis of Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative

- Land Use – 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 – 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?
- Relationship to Objectives – Refer to the Objectives section of this letter. If staff were to study the objectives as defined in the City Council Resolution, what would be the outcome?

Environmentally Superior Alternative

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.
- The Mission Valley Community Plan is inconsistent with the Serra Mesa Community Plan and 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."

What would be the conclusion if the linkages and the Mission Valley Community Plan inconsistencies were considered? For discussion refer to the No Build/Remove from Mission Valley Community Plan Alternative section in this letter.

Additionally, it's stated that "…both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project."

- The studies don't necessarily support this conclusion for the "Alternative 1- No Project Alternative" and "Alternative 2 – Bicycle, Pedestrian, Emergency Access Only Alternative." Refer to the discussion under alternatives in this letter and to traffic impacts for all of the intersections identified to operate at LOS E and LOS F (p. 5.2-33).
- With the street connection there is a 31 minute delay at I-805 SB on-ramp (p. 5.2-35). To reduce the delay to zero requires mitigation – fair share contribution to Caltrans. The impacts of the mitigation and the feasibility of implementation aren't discussed. The "No Street Connection" shows 15 minute delays on I-805 (Appendix C) in the year 2035, which is within the City's acceptable threshold. The data doesn't support the analysis that the No Street Connection "would result in greater impacts associated with transportation and traffic..." (9.5.3) Will this information be added to this discussion of environmentally superior alternative? If not, provide an explanation for the exclusion.

It's stated that "…these impacts would be mitigated to less-than-significant levels under the proposed project." Refer to the Mitigation section of this letter. If the infeasible mitigations aren't included, what would be the impact?

The statement is made "It should be noted, however, that both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or in the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project." If it were determined that the VMT study is inaccurate, what would be the impact on this conclusion?

Conclusion

This chart summarizes the major issues that have been described in the body of this letter. Refer to the appropriate sections of the letter for a description/discussion of the item/comment.

Flaw	Item/Comment
Omission	Emergency, bike, and pedestrian access exists between Kaplan Dr in Serra Mesa and Aperture Circle in Civita (Mission Valley).[2,3]
Omission	Multifamily units at City View Church are Retirement/Senior housing (sensitive receptors) [2,3] located approximately 300 feet from the roadway connection.
Omission	Mission Valley Community Plan is in the process of being updated; inconsistency with Serra Mesa Community Plan could be corrected at this time.[3]
Omission	Trail for pedestrians and bicyclists linking Civita and Phyllis Place Park already mandated without the roadway connection. [1, 3]
Omitted in discussion	Mission Center Rd and Mission Village Dr provide a direct link between Serra Mesa and Mission Valley. [3] This was not included in the sections discussing linkages.
Violates City Policies and Goals	• Walkable Community and City of Villages[1, 2,3] (e.g., impacts on bisected park and roadway connection will increase traffic on Civita local streets). • Fosters auto dependency [2,3] (e.g., roadway connection won't encourage mass transit usage).[3] • Vehicle congestion relief [3] (e.g., bar charts in this letter show an increase in congestion in Serra Mesa and Mission Valley). • Bicycling[1] (e.g., mitigations require bike lane removal) [3] • Safe and efficient street design[2] (e.g., safety of bisected park[3]; City View driveway deemed to provide a safety hazard for vehicles entering or exiting at City View).
Violates Serra Mesa Community Plan	References from SMCP: • Street widening and other improvements should be minimized.[3] • Safe transportation system with minimal adverse effects.[3] • Steep hillside and canyons protected and preserved. [3]
Violates Mission Valley Community Plan	References from MVCP: • Streets should be connected to road network and not to the mesas.[3] • Franklin Ridge Rd extension is 4 lanes rather than stipulated 2 lanes.[3] • Roadway connection would extend above the 150-foot contour restriction.

Flaw	Item/Comment
Traffic Impact Study & Analysis Inadequate; Data may be invalid	• Inadequate Traffic Impact Study (traffic counts outdated).[3] • Impact of queuing on residential area not studied (e.g., long term 31 min delay at I-805 SB Ramp PM).[3] • Study not comprehensive – Not studied: the adjacent main streets of Serra Mesa (e.g., Greyling Dr), Texas St (a direct thoroughfare), Friars near Qualcomm Stadium.[3] • Possibility of induced traffic not studied.[3] • Not all of the proposed and/or approved projects for Mission Valley are included in the study.[3] • If roadway connection not approved, developer required to make improvements to Mission Center Rd. These improvements aren't considered in the analyses.[3]
Inconsistency	In Recirculated DEIR description of Phyllis Place from Franklin Ridge to I-805 SB ramp described as widening (p. 5.2-27) in MM-TRAF-3 and as reconfiguring in MM-TRAF-11 (p. 5.2-39).
Air Quality & Noise Analysis Validity	• Impacts on sensitive receptors not studied.[3] • Air quality and Noise analysis is based on Traffic Impact Study and will be invalid if the Traffic Impact Study is invalid.[3]
Data May Not Be Valid	No basis for estimate made of current VMT in (all) regions with VMT affected by the proposed road connection nor any basis for estimating the extent of increase or decrease in VMT expected from the roadway connection. Data used for VMT analysis inaccurate.
Deficient	Recirculated DEIR objectives don't agree with City Council Resolution and mandates.
Objectives Not Met	Both Recirculated DEIR objectives (which are different from the ones in DPEIR) and City Council's objectives (see references in letter) aren't met.
Mitigation Analysis Inadequate or Infeasible	• Detailed description not provided for all mitigations (e.g., Murray Ridge and I-805 NB and SB ramps). • Impact on environment for mitigations not studied/discussed (e.g., land needed for widening of Phyllis Place from two lanes to five lanes).[3] • Impact of implementation of mitigations on adjacent streets not studied/discussed (e.g., Raejean, Greyling Dr, etc.).[3] • Implementation of 6 of the 19 mitigations violates City's land use and mobility policies; 8 of 19 mitigations assume mitigation will not occur; 10 of 19 mitigations would remain Significant and Unavoidable. (Letter, Impacts Section)
Conclusion Not Based on Evidence	Negative aesthetic site of project and substantial alteration to existing or planned character of area considered insignificant. Evidence: park bisected by roadway and ADTs increase from 2,420 (existing) to 34,540 (long term). Huge traffic increase into a residential community brings with it by definition additional safety and quality of life issues (noise, accidents, parking, and pollution for example).
Conclusion Not Based on Evidence	• Recirculated DEIR indicates the alternatives would result in greater impacts associated with transportation and traffic. Cumulative impact bar chart analysis proves the roadway connection results in greater impacts in Serra Mesa. • Many of the mitigations aren't feasible. An analysis using any infeasible mitigation to show a less-than-significant impact is inaccurate.

Flaw	Item/Comment
Conclusion Not Based on Evidence	The No Build/Remove from Mission Valley Community Plan Alternative was rejected because it didn't meet the Recirculated DEIR project objectives. When, in reality, the facts are: • Mission Center Rd provides a multi-modal linkage. • Trail for pedestrian and bike access is mandated. • Emergency access exists. • Increase in congestion if roadway connection built (Letter, bar charts). • Required improvement to Mission Center Rd if roadway connection not approved (Final PEIR for the Quarry Falls Project). • Recirculated DEIR admits that the roadway connection creates a "safety hazard" for vehicles entering and exiting at the City View Church • Data supporting contention that the City's Climate Action Plan and Bicycle Master Plan Update would be inconsistent not provided. This alternative is feasible.
Inconsistency & A Priori Assumption	In discussing the No Build/Remove from Mission Valley Community Plan Alternative this statement is made "… the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended." (9.4.1.2) The City knew in 2008 prior to the development of the Climate Action Plan (2015) and the Bicycle Master Plan (2013) that there was a conflict between the Serra Mesa Community Plan and the Mission Valley Community Plan.

[1] Refers to Final PEIR for the Quarry Falls Project, July 2008

[2] Refers to Notice of Preparation, 2012

[3] Refers to Serra Mesa Community Plan Amendment Street Connection: Draft Programmatic Environmental Impact Report, dated 4/15/2016

As indicated in the above chart comments were made and submitted during the NOP and the DPEIR timeframe. The corrections weren't made to this Recirculated DEIR. This Recirculated DEIR is inadequate and many of the mitigation measures are infeasible because they conflict with the City's land use and mobility policies and/or cost.

Thank you for the opportunity to review this Recirculated DEIR. 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.

Sincerely,

Bob Crider
Chair, Serra Mesa Planning Group

References

These substantial background records are already within the city's files and records and state records. If a full copy is desired, requested, or necessary to be submitted, please inform the above writer.

City of San Diego. 2016. *California Environmental Quality Act Significance Determination Thresholds*. July. Available: https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf.

City of San Diego. 2013. *City of San Diego Bicycle Master Plan*. Final – December 2013. Available: https://www.sandiego.gov/sites/default/files/legacy/planning/programs/transportation/mobility/pdf/bicycle_master_plan_final_dec_2013.pdf.

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City of San Diego, 2016. *Franklin Ridge Road Connection Traffic Impact Study* (*Serra Mesa Community Plan Amendment Street Connection/Project No 265605/Draft EIR)*, January 2015. Available: https://www.sandiego.gov/sites/default/files/appendix_c_traffic_impact_analysis_corrected.pdf

City of San Diego. 2008. *General Plan*. Adopted March 10. Available: https://www.sandiego.gov/planning/genplan#genplan.

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City of San Diego, 2008. *Resolution Number R-304295: A Resolution of the Council of the City of San Diego Granting Site Development Permit No. 183192 and Master Plan Development Permit No. 183193 For Quarry Falls Project No. 49068*, October 2008. http://docs.sandiego.gov/council_reso_ordinance/rao2008/R-304295.pdf

City of San Diego, 2016. *Serra Mesa Community Plan Amendment Street Connection/Project No 265605/Draft EIR*, April 2016. Available: https://www.sandiego.gov/sites/default/files/draft_eir_serra_mesa_community_plan_amendment_street_connection_041816.pdf.

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City of San Diego. 2004. San Diego Municipal Code, Land Development Code: Steep Hillside Guidelines. August. Available: https://www.sandiego.gov/sites/default/files/legacy/development-services/pdf/industry/landdevmanual/ldmsteephillsides.pdf

City of San Diego. 2002. *Street Design Manual 2002*. Available: https://www.sandiego.gov/planning/programs/transportation/library/stdesign.

City of San Diego. 1998. Traffic Impact Study Manual. July. Available: http://www.sandiego.gov/development-services/pdf/industry/trafficimpact.pdf

SANDAG, Transportation Forecast Information Center. Access http://tfic.sandag.org/ > Zoom to Phyllis Place vicinity > Select Series 12 > Forecast Year 2035 > Click on appropriate street (Note: Franklin Ridge segment between Phyllis Place and Via Alta (information on street is misidentified as Murray Ridge).

State of California, Title 14, Article 7. California Environmental Quality Act. EIR Process. Available: http://resources.ca.gov/ceqa/guidelines/art7.html.

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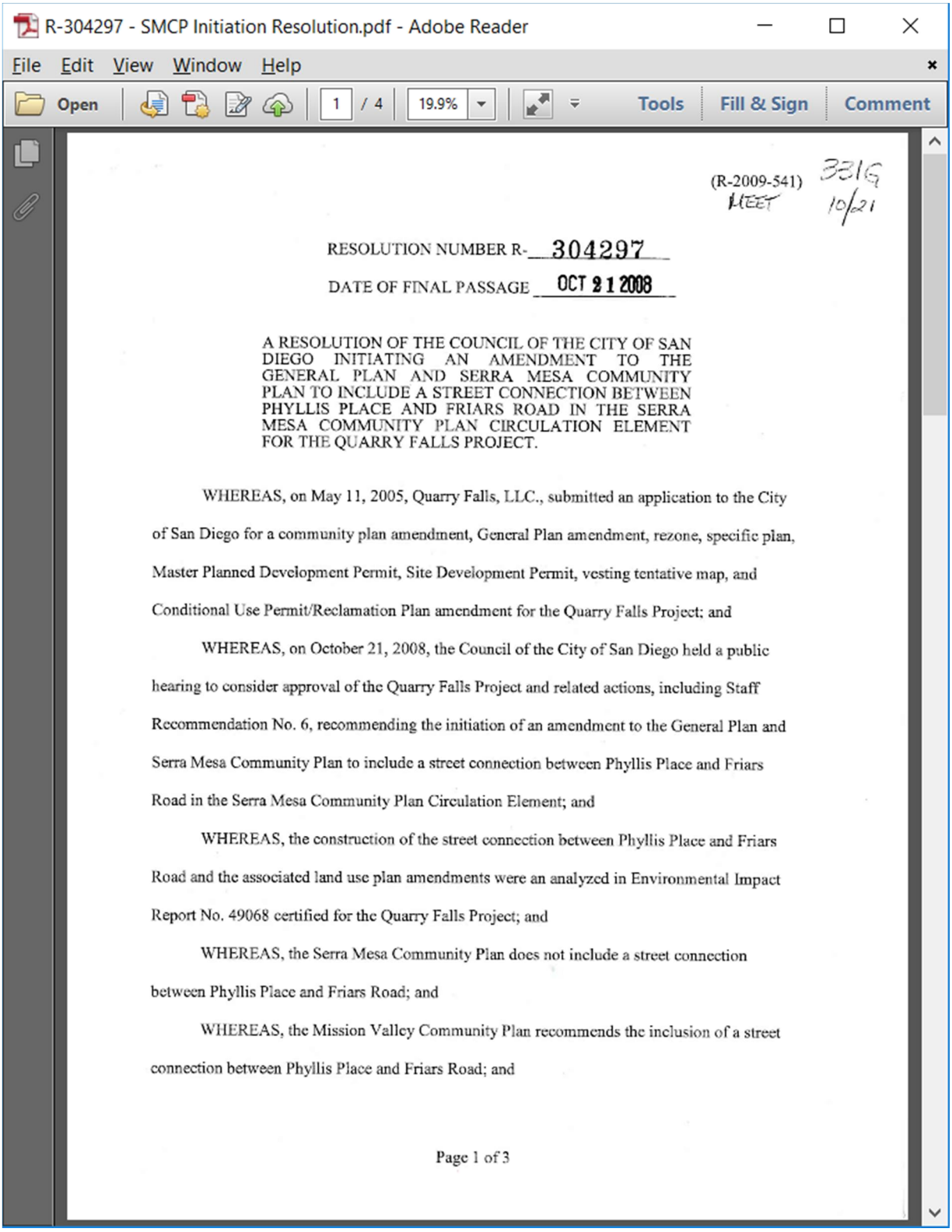
State of California, 2014. Updating Transportation Impacts Analysis in the CEQA Guidelines. Available: http://www.catc.ca.gov/meetings/agenda/2014Agenda/2014_10/Yellows/Tab18_%204%205.pdf.

Attachment - Missing Online Included in the Addendum, p. 1-4

City Council Resolution 304297: A Resolution of the Council of the City of San Diego Initiating An Amendment to the General Plan and Serra Mesa Community Plan to Include a Street Connection Between Phyllis Place and Friars Road in the Serra Mesa Community Plan Circulation Element for the Quarry Falls Project October 2008.

Addendum

City Council Resolution R-304297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(R-2009-541) MEET 331G 10/21

RESOLUTION NUMBER R- 304297

DATE OF FINAL PASSAGE OCT 21 2008

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO INITIATING AN AMENDMENT TO THE GENERAL PLAN AND SERRA MESA COMMUNITY PLAN TO INCLUDE A STREET CONNECTION BETWEEN PHYLLIS PLACE AND FRIARS ROAD IN THE SERRA MESA COMMUNITY PLAN CIRCULATION ELEMENT FOR THE QUARRY FALLS PROJECT.

WHEREAS, on May 11, 2005, Quarry Falls, LLC., submitted an application to the City of San Diego for a community plan amendment, General Plan amendment, rezone, specific plan, Master Planned Development Permit, Site Development Permit, vesting tentative map, and Conditional Use Permit/Reclamation Plan amendment for the Quarry Falls Project; and

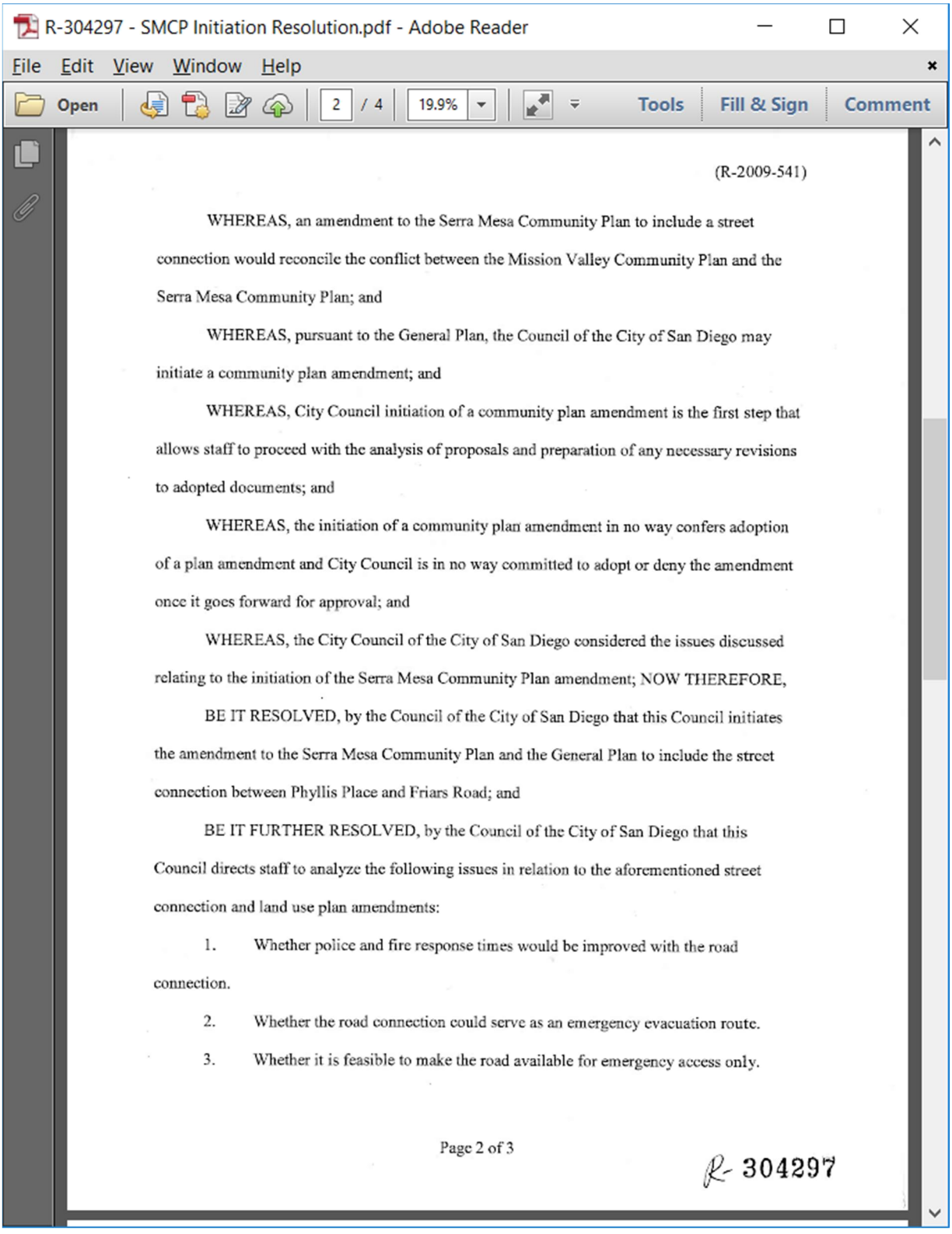
WHEREAS, on October 21, 2008, the Council of the City of San Diego held a public hearing to consider approval of the Quarry Falls Project and related actions, including Staff Recommendation No. 6, recommending the initiation of an amendment to the General Plan and Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road in the Serra Mesa Community Plan Circulation Element; and

WHEREAS, the construction of the street connection between Phyllis Place and Friars Road and the associated land use plan amendments were an analyzed in Environmental Impact Report No. 49068 certified for the Quarry Falls Project; and

WHEREAS, the Serra Mesa Community Plan does not include a street connection between Phyllis Place and Friars Road; and

WHEREAS, the Mission Valley Community Plan recommends the inclusion of a street connection between Phyllis Place and Friars Road; and

Page 1 of 3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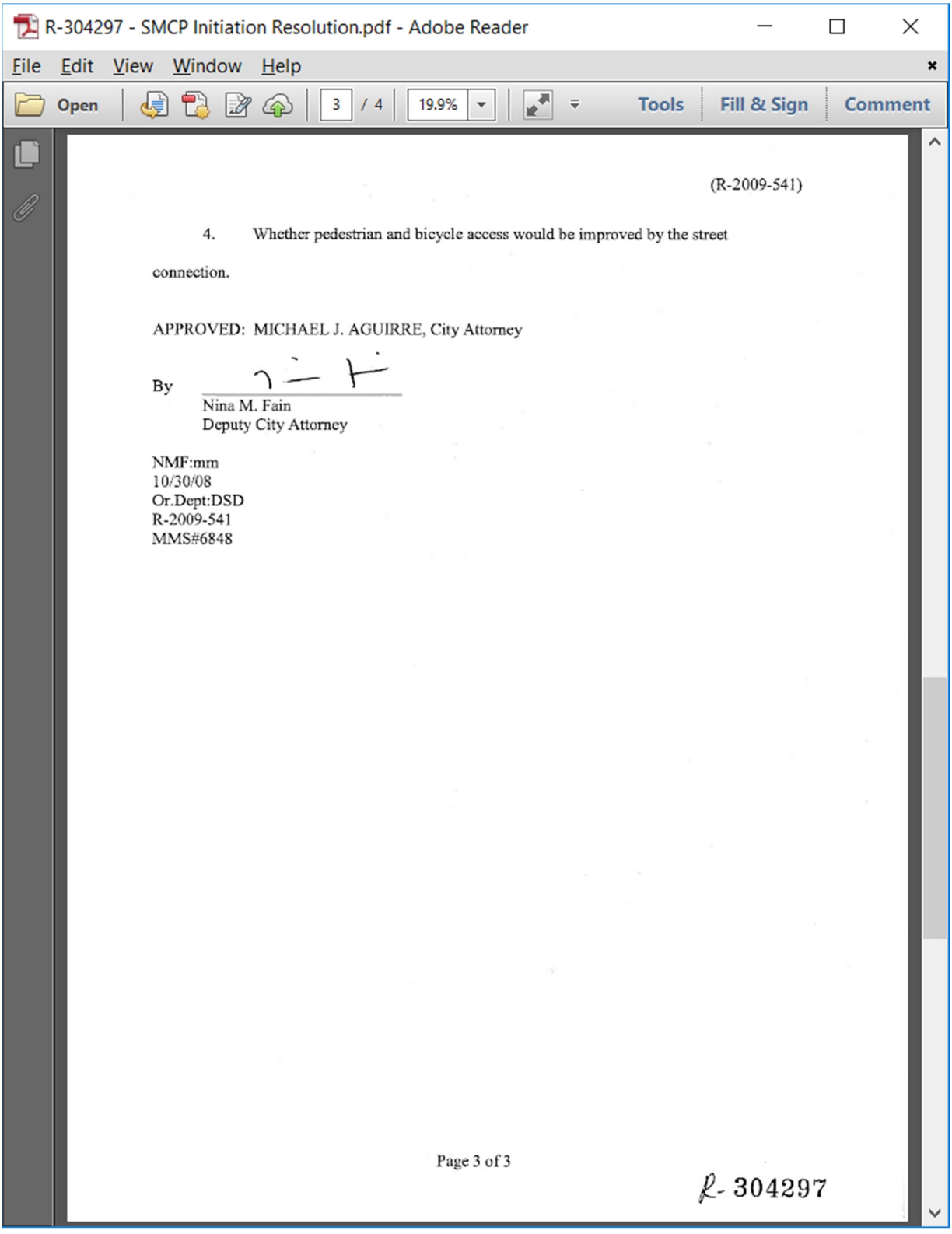
Comment
(R-2009-541)
WHEREAS, an amendment to the Serra Mesa Community Plan to include a street connection would reconcile the conflict between the Mission Valley Community Plan and the Serra Mesa Community Plan; and
WHEREAS, pursuant to the General Plan, the Council of the City of San Diego may initiate a community plan amendment; and
WHEREAS, City Council initiation of a community plan amendment is the first step that allows staff to proceed with the analysis of proposals and preparation of any necessary revisions to adopted documents; and
WHEREAS, the initiation of a community plan amendment in no way confers adoption of a plan amendment and City Council is in no way committed to adopt or deny the amendment once it goes forward for approval; and
WHEREAS, the City Council of the City of San Diego considered the issues discussed relating to the initiation of the Serra Mesa Community Plan amendment; NOW THEREFORE,
BE IT RESOLVED, by the Council of the City of San Diego that this Council initiates the amendment to the Serra Mesa Community Plan and the General Plan to include the street connection between Phyllis Place and Friars Road; and
BE IT FURTHER RESOLVED, by the Council of the City of San Diego that this Council directs staff to analyze the following issues in relation to the aforementioned street connection and land use plan amendments:
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.
Page 2 of 3
R- 304297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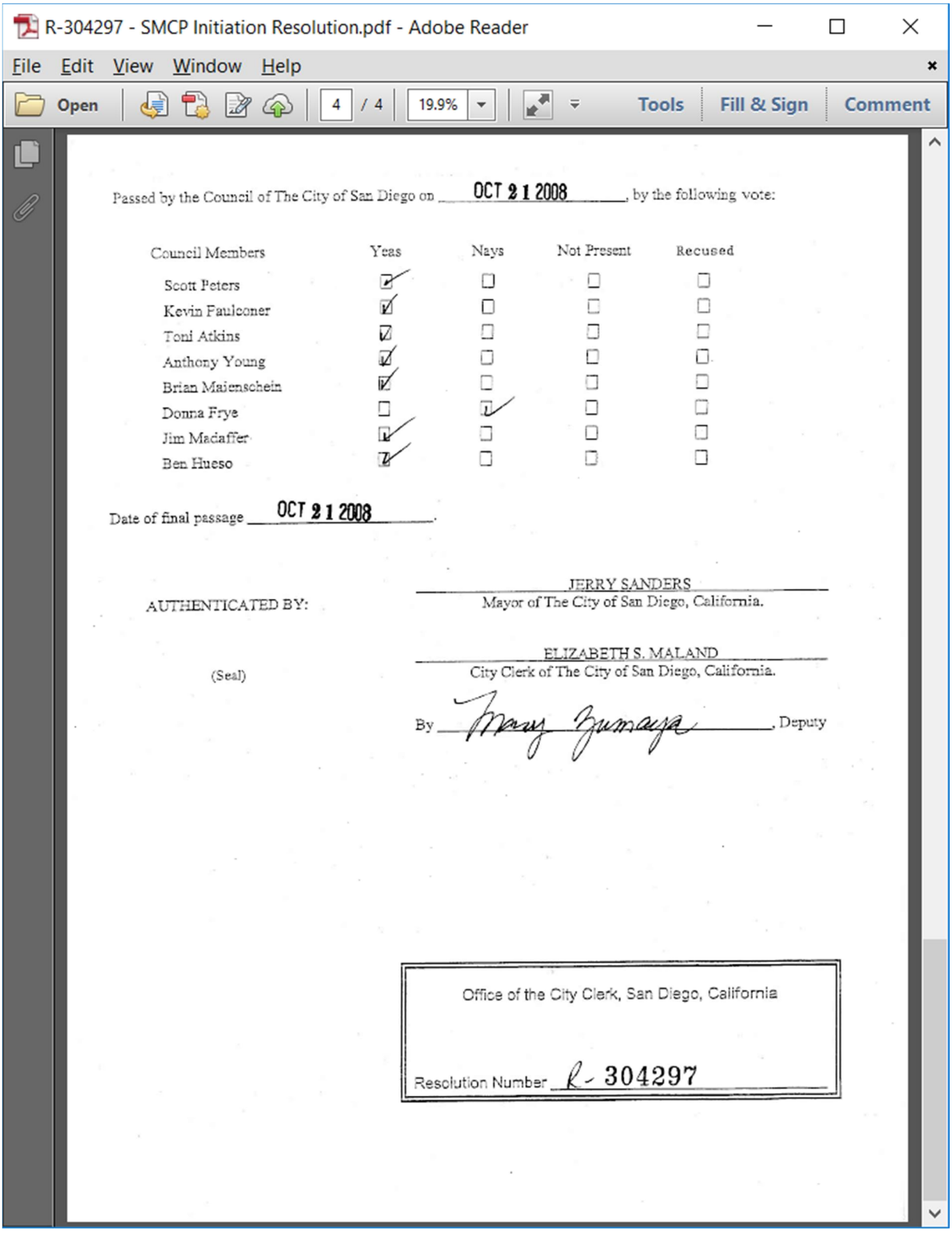
Comment
(R-2009-541)
4. Whether pedestrian and bicycle access would be improved by the street connection.
APPROVED: MICHAEL J. AGUIRRE, City Attorney
By
Nina M. Fain
Deputy City Attorney
NMF:mm
10/30/08
Or.Dept:DSD
R-2009-541
MMS#6848
Page 3 of 3
R- 304297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Comment
Passed by the Council of The City of San Diego on OCT 21 2008, by the following vote:
Council Members Yeas Nays Not Present Recused
Scott Peters
Kevin Faulconer
Toni Atkins
Anthony Young
Brian Maienschein
Donna Frye
Jim Madaffer
Ben Hueso
Date of final passage OCT 21 2008.
AUTHENTICATED BY:
JERRY SANDERS
Mayor of The City of San Diego, California.
(Seal)
ELIZABETH S. MALAND
City Clerk of The City of San Diego, California.
By , Deputy
Office of the City Clerk, San Diego, California
Resolution Number R- 304297

Data Analysis

Intersection AM Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Intersection	LOS Without Project		LOS With Project		Change in LOS**					
					Improve		No Change		Worsen	
	MV	SM	MV	SM	MV	SM	MV	SM	MV	SM
1. Friars Rd & River Run Rd	B		B				X			
2. Friars & Fenton Pkwy	C		C				X			
3. Friars Rd & Northside	B		B				X			
4. Mission Center Rd & Murray Ridge/Phyllis Pl		E		C		X				
5. Mission Center Rd & Aquatera	B		B				X			
6. Mission Center Rd & Civita Blvd	C		C				X			
7. Mission Center Rd & Westside Dr	B		B				X			
8. Mission Center Rd & Friars Rd/EB ramps	B		B				X			
9. Mission Center Rd & Friars/WB ramps	B		B				X			
10. Mission Center Rd & Mission Center Ct	C		C				X			
11. Aero Dr & Sandrock Rd		B		B				X		
12. Murray Ridge Rd & Sandrock Rd		B		B				X		
13. Murray Ridge & Pinecrest Ave		B		B				X		
14. Murray Ridge & I-805 NB ramp		B		C						X
15. Murray Ridge & I-805 SB ramp		C		E						X
16. Qualcomm Wy & Friars EB ramp	C		C				X			
17. Qualcomm Wy & Friars WB ramp	C		C				X			
18. Qualcomm Wy & Rio Bonito Wy	C		C				X			
19. Rio San Diego Dr & Rio Bonito Wy	B		B				X			
20. Phyllis Pl & Franklin Ridge Rd		-		A						X***
21. Via Alta & Franklin Ridge Rd	D		D				X			
22. Via Alta & Civita	B		B				X			
23. Civita Blvd & Russell Pkwy/Gill Village Dr	A		B						X	
24. Qualcomm Wy & Civita Blvd	B		B				X			
Total	17	7			0	1	16	3	1	3
% of Total by Community					0%	14%	94%	43%	6%	43%

*Data from Table 5.2-17 **MV=Mission Valley; SM=Serra Mesa ***Starting data is 0; adding traffic impacts it

Analysis for Intersections AM

- Serra Mesa Intersections: 14%, improve; 43%, no change; 43%, worsen
- Mission Valley Intersections: 0%, improve; 94%, no change; 6%, worsen

Intersection PM Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Intersection	LOS Without Project		LOS With Project		Change in LOS**					
					Improve		No Change		Worse	
	MV	SM	MV	SM	MV	SM	MV	SM	MV	SM
1. Friars Rd & River Run Rd	C		C				X			
2. Friars & Fenton Pkwy	C		C				X			
3. Friars Rd & Northside	E		E				X			
4. Mission Center Rd & Murray Ridge/Phyllis Pl		F		D		X				
5. Mission Center Rd & Aquatera	B		B				X			
6. Mission Center Rd & Civita Blvd	D		C		X					
7. Mission Center Rd & Westside Dr	C		C				X			
8. Mission Center Rd & Friars Rd/EB ramps	C		B		X					
9. Mission Center Rd & Friars/WB ramps	C		C				X			
10. Mission Center Rd & Mission Center Ct	D		D				X			
11. Aero Dr & Sandrock Rd		C		C				X		
12. Murray Ridge Rd & Sandrock Rd		D		E						X
13. Murray Ridge & Pinecrest Ave		B		B				X		
14. Murray Ridge & I-805 NB ramp		D		F						X
15. Murray Ridge & I-805 SB ramp		E		F						X
16. Qualcomm Wy & Friars EB ramp	E		E				X			
17. Qualcomm Wy & Friars WB ramp	F		E		X					
18. Qualcomm Wy & Rio Bonito Wy	D		D				X			
19. Rio San Diego Dr & Rio Bonito Wy	B		B				X			
20. Phyllis Pl & Franklin Ridge Rd		-		B						X***
21. Via Alta & Franklin Ridge Rd	B		F						X	
22. Via Alta & Civita	B		C						X	
23. Civita Blvd & Russell Pkwy/Gill Village Dr	C		C				X			
24. Qualcomm Wy & Civita Blvd	C		C				X			
Total	17	7			3	1	12	2	2	4
% of Total by Community					18%	14%	70%	29%	12%	57%

*Data from Table 5.2-17 **MV=Mission Valley; SM=Serra Mesa ***Starting data is 0; adding traffic impacts it

Analysis for Intersections PM

- Serra Mesa Intersections: 14%, improve; 29%, no change; 57%, worsen
- Mission Valley Intersections: 18%, improve; 70%, no change; 12%, worsen

Roadway Segment Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Roadway Segment	Mission Valley	Serra Mesa	LOS W/Out Project	LOS With Project	Change in LOS**					
					Improve		No Change		Worsen	
					MV	SM	MV	SM	MV	SM
Civita Blvd										
Mission Center Rd to Via Alta	X		B	A	X					
Via Alta to Russell Parkway	X		B	A	X					
Russell Pkwy to Qualcomm Wy	X		C	B	X					
Qualcomm Wy to Franklin Ridge	X		A	C					X	
Franklin Ridge Rd										
Via Alta to Civita	X		C	F					X	
Phyllis Place to Via Alta		X	0	D						X
Friars Rd										
Mission Center Rd to Qualcomm Wy	X		C	C			X			
Qualcomm Wy to Fenton Pkwy	X		C	C			X			
Fenton Pkwy to Northside Dr	X		C	C			X			
Mission Center Rd										
Hazard Center Dr to Friars Rd	X		D	D			X			
Friars Rd to Mission Center Drwy	X		C	C			X			
Mission Center Drwy to Mission Valley Rd	X		B	B			X			
Mission Valley Rd to Aquatera Drwy	X		C	A	X					
Aquatera Drwy to Murray Ridge Rd		X***	F	F				X		
Murray Ridge Rd										
I-805 NB ramp to Mission Center Rd		X	F	F				X		
Mission Center Rd to Pinecrest Ave		X	F	F				X		
Pinecrest Ave to Sandrock Rd		X	F	F				X		
Phyllis Pl										
Abbotshill Rd to Franklin Ridge Rd		X	A	A				X		
Franklin Ridge Rd to I-805 SB ramp		X	A	F						X
I-805 SB ramp to I-805 NB ramp		X	E	F						X
Qualcomm Way										
Civita Blvd to Friars Rd WB ramp	X		B	C					X	
Friars Rd WB to Friars Rd EB ramp	X		B	B			X			
Friars Rd EB ramp to Rio San Diego	X		B	B			X			
Rio San Diego Dr										
Qualcomm Wy to Rio Bonito Wy	X		E	E			X			
Russell Pkwy										
Civita Blvd to Friars Rd	X		C	C			X			
Sandrock Rd										
Murray Ridge to Aero Dr		X	D	D				X		
Westside Dr										
Mission Center Rd to Via Alta	X		C	D					X	
Via Alta										
Franklin Ridge Rd to Civita Blvd	X		A	C					X	
Civita Blvd to Westside Dr	X		A	A			X			
Total	20	9			4	0	11	6	5	3
% of Total by Community					25%	0%	55%	67%	20%	33%

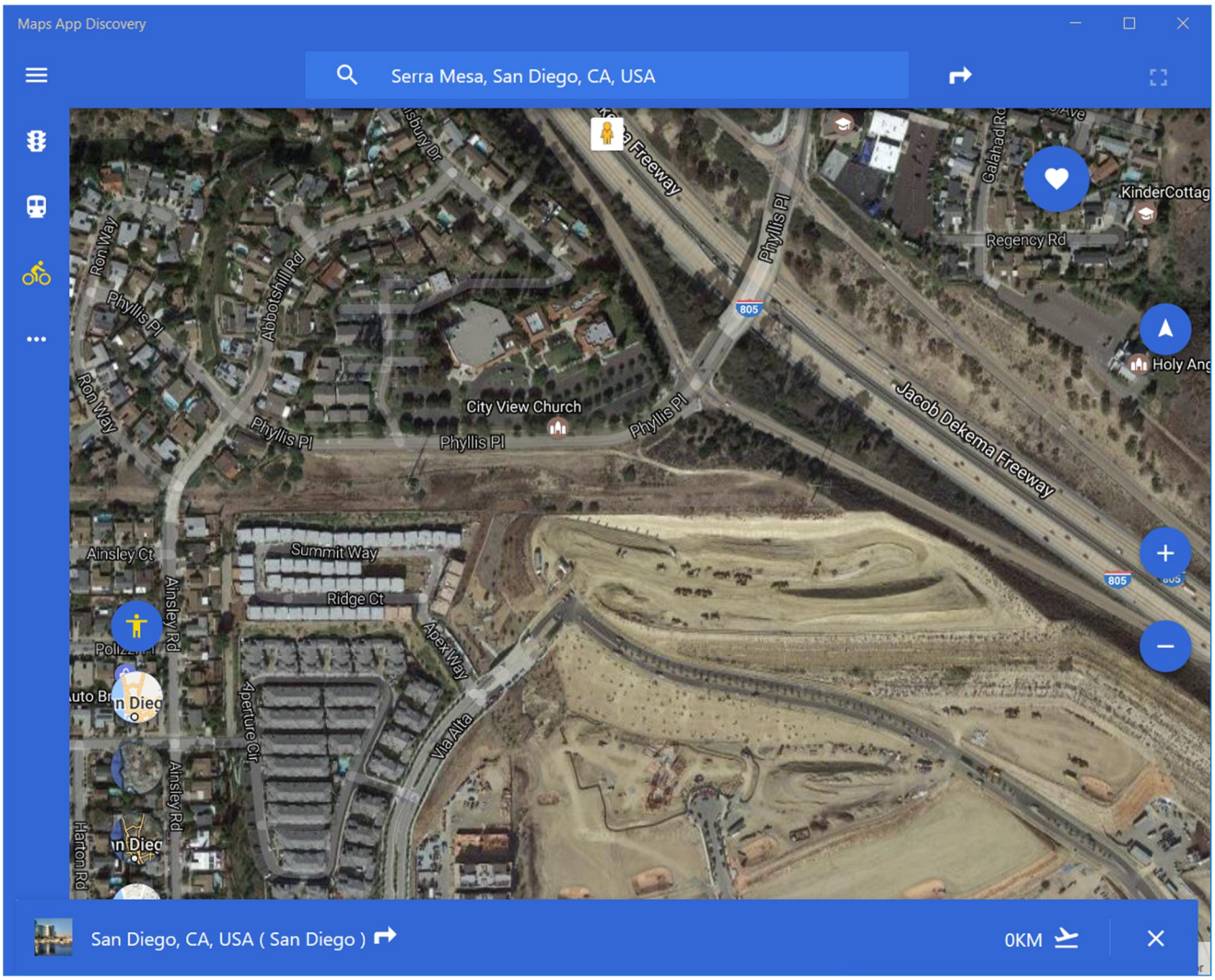
*Data from Table 5.2-16 **MV=Mission Valley; SM=Serra Mesa ***Most of this area is in Serra Mesa

Analysis for Roadway Segment

- Serra Mesa Segments: 0%, improve; 67%, no change; 33%, worsen
- Mission Valley Segments: 25%, improve; 55%, no change; 20%, worsen

Maps

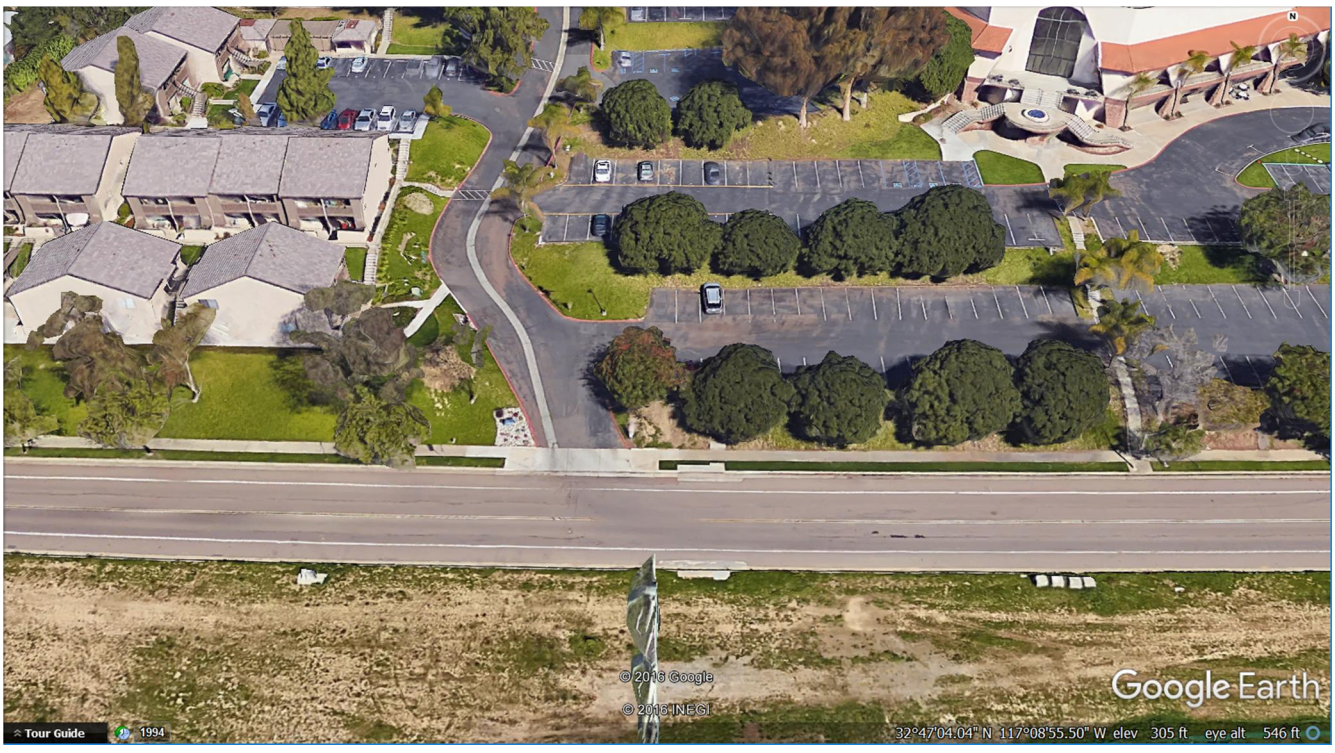
View of City View Church, Via Alta & Franklin Ridge, Freeways and Housing in Serra Mesa and Civita



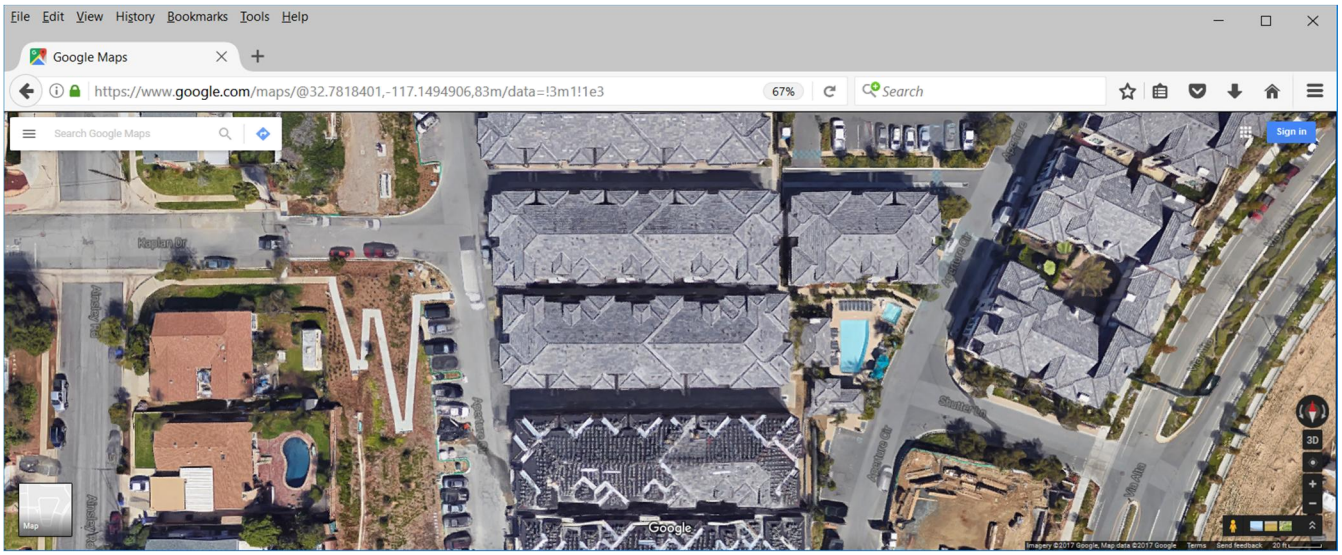
City View Church's Two Driveways, Retirement/Senior Housing, Transmission Line & Steep Hillside

Roadway connection will be located south side of Phyllis Pl across from church's east driveway and path.

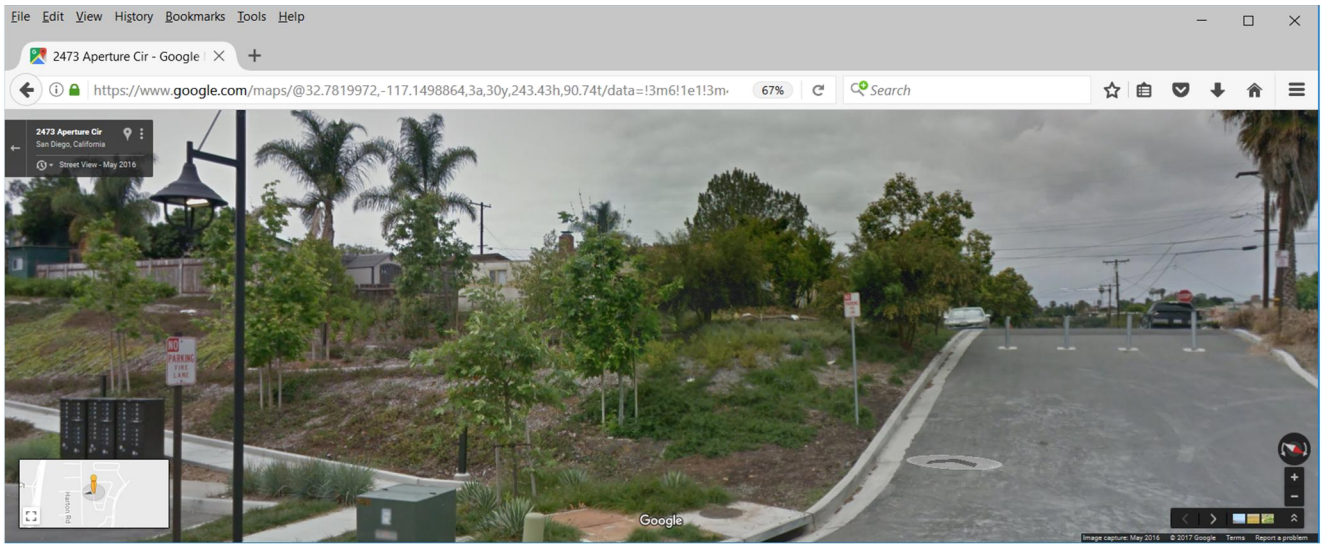
Retirement/Senior Housing (windows facing street); Roadway connection across street from church path



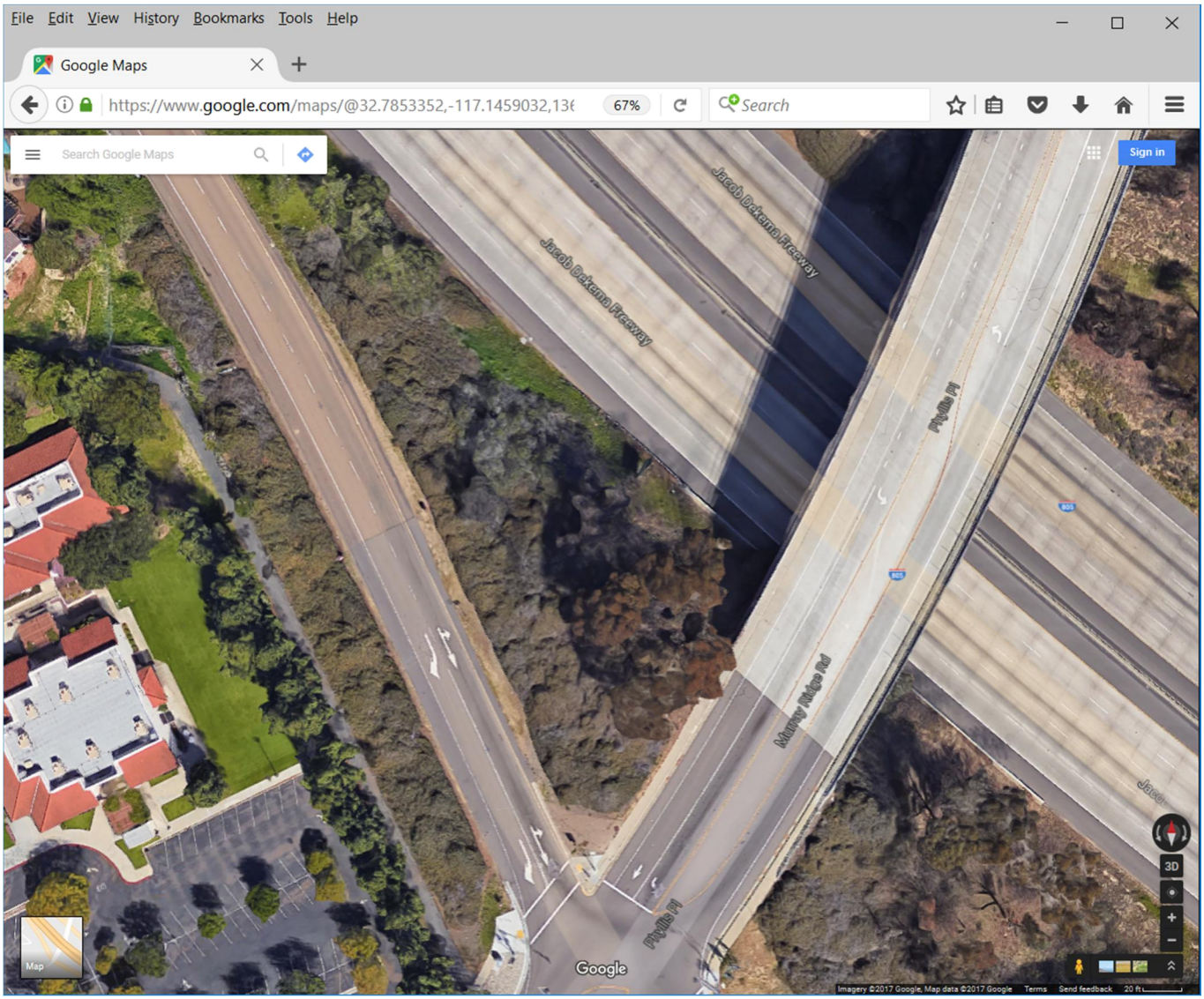
Shows Emergency Access at Kaplan and Aperture Circle and
Sidewalk (switchback) adjacent to Kaplan from Ainsley to Aperture Circle



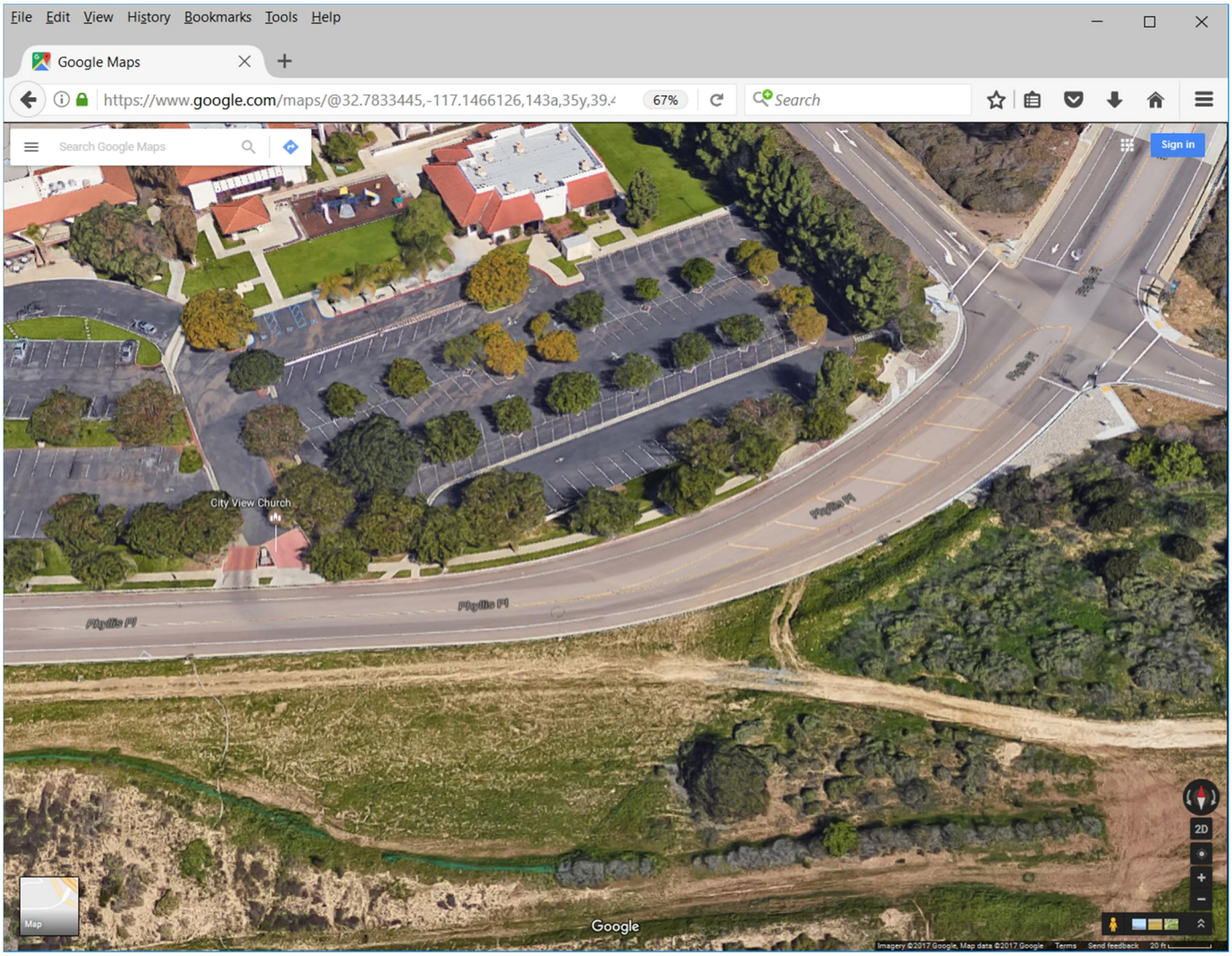
Shows Emergency Access (bollards) at Kaplan and Aperture Circle and some of the sidewalk



I-805 Phyllis Place Bridge – Shows Lanes over the Bridge



I-805 NB and SB Ramps and City View Church



Trail from Civita to Serra Mesa