In accordance with our mandate under Article II, Section 1 of Council Policy 600-24 to make recommendations to the City Council, Planning Commission, and City staff concerning the preparation of or amendment to a land use plan, the Serra Mesa Planning Group hereby presents the following comments for inclusion in the staff report to the Planning Commission and City Council on the Proposed Serra Mesa Community Plan Amendment Street Connection (Franklin Ridge Road), Project No. 265605 SCH No. 2012011048.

SERRA MESA PLANNING GROUP'S SUMMARY/POSITION STATEMENT

- 1. SMPG recommends <u>AGAINST</u> amending the Serra Mesa Community Plan to include the street connection for the following reasons:
 - The emergency connection is redundant and is neither required nor necessary.
 - The connection will not improve overall traffic flow in the study area and, in fact, will degrade it.
 - The proposed Amendment has been rejected numerous times by Planning Commission (2004 and 2008) and City Council (2005).
 - The connection is strongly opposed by the affected Community.
- 2. SMPG recommends <u>NOT</u> to amend the Serra Mesa Community Plan to include a street connection on the basis that the PEIR does not meet project objectives and shows a significant negative environmental impact on traffic. PEIR inadequately studied noise and pollution impacts (e.g., sensitive receptors not considered).

The PEIR is NOT complete and NOT in compliance with CEQA. Alternatives are not comprehensive. Information is contradictory in multiple locations, fundamentally inadequate and conclusory.

- Emergency, pedestrian and cyclist access already exists on Kaplan Drive, and more will be provided with the trail through the park on Phyllis Place connecting the two communities.
- Mission Center Road and Mission Village Drive provide interconnectivity between the two communities.
- 3. SMPG recommends the proposed Community Plan Amendment be <u>DENIED</u>. The CPA does not meet proposed goals and does not benefit the residents of either community.
- 4. SMPG recommends that the Mission Valley Community Plan be <u>REVISED</u> to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts: air quality, transportation/circulation, and noise (operational) in both communities.

EMERGENCY ROAD CONNECTION ANALYSIS FLAW

When the City Council requested the initiation of this CPA in 2008, their discussion was heavily focused on public safety, emergency evacuation, and fire department access. Unfortunately, no one who was so authorized informed the Council during this discussion that there is already an emergency-only connection at Kaplan Drive from Civita to Serra Mesa designed into the project.

Issues City Council directed staff to analyze		Findings	
1.	Whether police and fire response time would be improved with road connection	Police – "Would not likely increase" (PEIR, p. 7-14) Fire – "Potentially reducing" (PEIR, p. 7-14) but PEIR didn't consider Kaplan Drive	
2.	Whether the road connection could serve as an emergency evacuation route	Evacuation route already exists at Kaplan Drive and Aperture Circle.	
3.	Whether it is feasible to make the road available for emergency access only	Emergency access already exists at Kaplan Drive and Aperture Circle	
4.	Whether pedestrian and bicycle access would be improved by the street connection	Pedestrian and bicycle access already exist with Kaplan Drive and planned trail through Phyllis Place Park	

STREET CONNECTION IMPACTS

- Required 1.3 acre linear park along Phyllis Place divided in two by connection safety issues *
- Required to relocate high-pressure gas line*
- Impacts MSCP, constructed through sensitive habitat, particularly coastal sage scrub
- Impacts 56 multifamily retirement units located across from street connection*
- May require redesign of driveways of City View Church located across from street connection*
- Blind curve in front of City View Church creating poor sight distance which can't be corrected*
- Steep grade (developer indicates maximum 10%) requiring deviations from the City's Street Design Manual (refer to City Council Resolution 304295) not considered in noise and air quality studies*
- Requires Murray Ridge Rd from I-805 NB ramp to Mission Center Dr to be restriped to 4-lane collector (PEIR, p. 5.2-27); at the minimum requires bike lane removal (reconfiguration limited by road width)
- Mitigation requires removal of bicycle lanes or houses on both sides of Murray Ridge to Pinecrest Ave but not recommended so "impact would remain significant and unavoidable" (PEIR, p. 5.2-27)

TRAFFIC IMPACTS

Street connection "might relieve congestion on local arterial streets and freeway segments" (PEIR, p. 3-1). This isn't proven by the traffic studies.

Impact Areas	Without Connection	With Connection	Results With Connection		
Phyllis Pl	ADTs: 2,420	ADTs: 34,540	Significant Increased Traffic - Worse		
Franklin Ridge/Via Alta	LOS: D	LOS: F	More traffic - Worse		
I-805 Bridge	LOS: E	LOS: F	65% More Vehicles - Worse		
I-805 on-ramps	Delays < 15 min	Delays 31-43 min	Significant Delays - Worse		
I-805 freeway	LOS: F	LOS: F	"would remain significant and unavoidable" ¹ - Unchanged		
*ADT=Average Daily Trips, *LOS=Traffic Level Of Service, *F=forced flow, extreme congestion, ¹ (PEIR, p. 5.2-30-31)					

Already planned and approved, scheduled for construction fall 2016: Phase 1 of SR-163 and Friars Road Interchange Project will alleviate severe traffic delays on Friars Road (City website)*

MISSION VALLEY COMMUNITY PLAN INCONSISTENCY

The Sand and Gravel Re-use Development section of the Mission Valley Plan (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.

SERRA MESA COMMUNITY OPPOSITION

The surveys conducted in the community over the years indicate overwhelming opposition to the street connection. The Serra Mesa Planning Group and members of the community have repeatedly expressed strong opposition to the street connection in writing and in person at all stages of the development process for Quarry Falls/Civita, and continue to express their opposition to the proposed Community Plan Amendment.

^{*}Not mentioned and/or discussed in the PEIR