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, adoption of, implementation 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 Roadway Connection Project, 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 roadway 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 roadway connection on the basis that the Recirculated DEIR does not meet project objectives and shows a significant negative environmental impact on traffic. The Recirculated DEIR inadequately studied noise and pollution impacts (e.g., sensitive receptors not considered).

The Recirculated DEIR is NOT complete and NOT in compliance with CEQA. Information is fundamentally inadequate and conclusory.

- Two communities are connected with the existing emergency, pedestrian and bicyclist access between Kaplan Drive in Serra Mesa and Aperture Circle in Mission Valley. Also, at least one trail for pedestrians and bicyclists from Civita to Phyllis Place Park is mandated with or without the roadway connection.
- Mission Center Road and Mission Village Drive provide interconnectivity between the two communities.
- 3. SMPG recommends that 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 transportation/circulation 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 and currently in use.

Issues City Council directed staff to analyze		Findings	
	Whether police and fire response time would be improved with road connection	Study/Documentation to support City's position of improvement not provided; Recirculated DEIR didn't consider Kaplan Dr	
	Whether the road connection could serve as an emergency evacuation route	Evacuation route already exists at Kaplan Dr and Aperture Circle	
	Whether it is feasible to make the road available for emergency access only	Emergency access already exists at Kaplan Dr and Aperture Circle	
	Whether pedestrian and bicycle access would be improved by the street connection	Pedestrian and bicycle access exists at Kaplan Dr and trail from Civita to Phyllis Place Park is mandated	

ROADWAY CONNECTION IMPACTS

- Required 1.33 acre linear park along Phyllis Place divided in two by connection safety issues
- Required to relocate high-pressure gas line
- Impacts environment, constructed through sensitive habitat, particularly coastal sage scrub
- Impacts 56 multifamily retirement/Senior units located across from roadway connection
- Creates "Potential to result in safety hazard for vehicles entering or exiting the City View Church" (5.2.6.1); church is located across from roadway intersection; church driveway and roadway intersection won't align
- Steep grade (developer indicates steepest just under 10%) not considered in noise and air quality studies
- Mitigation requires removal of bicycle lanes on both sides of Murray Ridge to Sandrock Road; "City's ability to implement...may be limited" so "impact would remain significant and unavoidable" (DEIR, p. 5.2-39)
- Implementation of 6 of the 19 mitigations violates City's land use and mobility policies; 8 of the 19 mitigations assumes mitigation will not occur; 10 of the 19 mitigations would remain Significant and Unavoidable
- 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)

TRAFFIC IMPACTS

Roadway connection "generally relieve congestion on neighborhood streets" (DEIR, p. 5-1-15). This isn't proven by the traffic studies long term analysis. See attachment for charts.

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 to Civita	LOS: C	LOS: F	More traffic - Worse		
I-805 Bridge	LOS: E	LOS: F	61% More Vehicles - Worse		
I-805 on-ramps	Delays < 15 min	Delays 31-43 min ¹	Significant Delays - Worse		
I-805 freeway	LOS: F	LOS: F	"would result in significant impact at six freeway segments" ²		
*ADT=Average Daily Trips, *LOS=Traffic Level Of Service, *F=forced flow, extreme congestion, ¹ Appendix C, p. 61,					

²DEIR, p. 5.2-37

Already planned and approved Phase 1 of SR-163 and Friars Road Interchange Project; scheduled for fall 2017 construction; will alleviate severe traffic delays on Friars Road (City website).

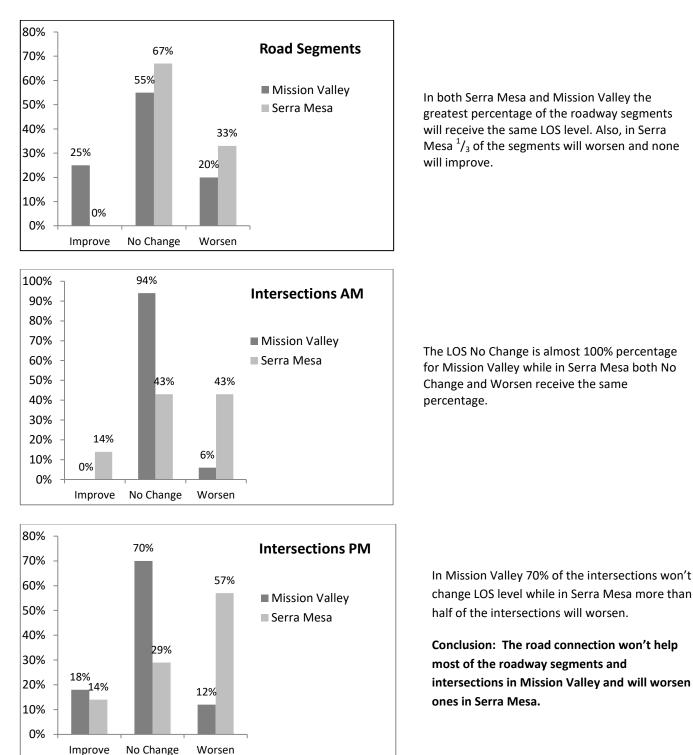
MISSION VALLEY COMMUNITY PLAN INCONSISTENCY

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

Analysis of the LOS Level Long-Term Baseline vs Long-Term Cumulative with Project*



*Charts based on Recirculated DEIR, Tables 5.2-16 and Table 5.2-17.

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.