

8859 Sandmark Avenue  
San Diego CA 92123  
August 13, 2015

City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego CA 92101

Attn.: Ms. Martha Blake, Environmental Planner

Dear Ms. Blake:

Subj.: Stadium Reconstruction Project  
Comments to Draft EIR

I present my comments on the subject Draft EIR as follows:

Section 2.4.1 General Plans and Zoning, Page 2-7

This Section appears to be based on the City General Plan dated 2008. Has this plan been updated to reflect actual use of land at the new Civita Project as developed? The Civita Project will impact the Stadium as further noted herein.

Section 4.1.3 Impact Analysis, Carbon Monoxide, Issue 4, Page 4.1-26

This issue fails to address the Franklin Ridge Road extension at the new Civita development as an additional source of carbon monoxide. This road would serve Stadium access to I-805 at Murray Ridge Road and Phyllis place and as such, should be considered in the Stadium EIR. Franklin Ridge Road will be a long steep grade (>6%) signalized at the top of the grade at Phyllis Place. The signal will create idling traffic and accelerating-from-idle uphill traffic in the Civita Development. Will trucks be prevented from using Franklin Ridge Road?

Section 4.9 Land Use, Page 4.9-1

This Section should include the Serra Mesa Community Plan if the Franklin Ridge Road is extended as this road will direct stadium traffic to and from the stadium through Serra Mesa. It should be noted that Serra Mesa Community Council has indicated opposition to the Franklin Ridge Road extension due to its negative impact on Serra Mesa.

Airport Land Use Section 4.9.3 Impact Analysis, Issue 3, Page 4.9-44

This issue addresses land uses that are not compatible with the Airport Land Use Comprehensive Plan (ALUCP). Reference is made to Fig. 4.9-5 (Page 4.9-45) titled, "Existing Land Uses Airport Environs". This Figure identifies the Civita Development as Extractive Industry (quarry mining activities). This land has subsequently been developed for high density use. Has, or will, the ALUCP be amended to reflect Civita Development and will this have subsequent impact on the stadium EIR?

Section 4.10 Mobility, Page 4.10

General:

The EIR doesn't address impact of the extension of Franklin Ridge Road through the Civita development that would provide access to and from the stadium. This road would be a major connection from the Stadium at Friars Road and Qualcomm Way to the I-805 freeway connection at Murray Ridge Road and Phyllis Place. This road is not under construction at present since it is scheduled for a later phase in the Civita Development. To date, the EIR for the extension of Franklin Ridge Road has not yet been issued for review and comment and this road extension has not yet been approved by the City. This road and its extension should be a key traffic element in the Stadium EIR.

Fig. 4.10-1 Study Locations and Intersections, Page 4.10-3

Items 18 & 19, and 20 & 21 indirectly, do not address the Franklin Ridge Road Extension. This road can be a major connector between these intersections and the I-805 freeway.

Existing Traffic Data, Page 4.10-8

This existing data can only be based on the partial completion of Civita since Civita is still under construction. Has the actual projected traffic data from Civita EIR studies been incorporated? See comments under Fig. 4.10-7 following for recommendations for Civita traffic analysis update.

Existing Mobility and Alternative Transportation – Trolley, Page 4.10-12

Has Civita's contribution to trolley traffic been considered? Have other transit improvements instituted by Civita been considered? The Civita development will affect the Stadium and its impact should be considered in the Stadium EIR.

Fig. 4.10-7 Mission Valley Development Intensity Districts, Page 4.10-45

A significant portion of District F includes the new Civita Development however Figure 4.10-7 shows this land as undeveloped. The traffic data for this District is shown based on land acreage and not hard data. The City should have this data from the Civita (Quarry Falls) studies. It should be noted, however, that traffic studies and mitigation efforts for the Civita Project have had unpredictable results and I recommend updating the traffic analysis for Civita prior to relying on it for the Stadium EIR (see correspondence R. Garner to Serra Mesa Community Council dated July 22, 2015).

Civita is a large development that is currently supplying significant traffic on Friars Road, and this development is not yet complete. I strongly recommend further traffic study of Civita in support of future Stadium use in consideration of this recent and ongoing development and traffic source near the Stadium.

Table 4.10-8, Page 4.10-47

This Table notes that District F "Excludes acreage within steep hillsides". This District includes the new Civita Development which has undergone considerable regrading, changing several large steep hillsides into numerous smaller steep hillsides. Does this affect the data in the table? Wouldn't this Table be more accurate if based on actual data from the Civita (Quarry Falls) studies? Note the aforementioned recommendation for Civita traffic analysis update.

Section 4.13 Public Services and Facilities, Parks and Recreation, Page 4.13-4:

In accordance with Table 4.9-1, Item B Recreational Element, Page 4.9-19, the Stadium Project would not create the need for new parks.

Although the Stadium Project apparently has no influence on City Parks needs, if the approval of the extension to Franklin Ridge Road is related to the Stadium Project, the Stadium Project will then decrease City Parks acreage as the Franklin Ridge Road extension will eliminate parks acreage in Civita. Even without the road extension, Civita is designed with a parks deficit as described on Page 3-17 of Final Program Environmental Report for the Quarry Falls Project (Civita), dated July 2008. Approval of the Franklin Ridge Road Extension to serve the Stadium will add to the Parks Deficit for Mission Valley and thus require the need to address Parks and Recreation impacts as a condition of the Stadium EIR.

Thank you for this opportunity to comment.

Sincerely,



Robert Garner

cc.: Serra Mesa Community Council  
Chatten-Brown and Carstens