

From: [Serra Mesa Planning Group](#)
To: [DSD EAS](#)
Subject: Stadium Reconstruction Project, Project No. 437916/SCH No. 2015061061
Date: Friday, September 18, 2015 9:10:14 AM
Attachments: [Stadium Draft EIR SMPG Response 9-17.docx](#)
[Stadium Draft EIR SMPG Letter 9-17 Scan w Sig.pdf](#)

Attachments include the Serra Mesa Planning Group's letter and response.

A hard copy will be mailed.

Cindy Moore

Chair, Serra Mesa Planning Group

Serra Mesa Planning Group

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

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September, 17, 2015

RE: Stadium Reconstruction Project
Project No 437916/SCH No. 2015061061

Ms. Martha Blake
Environmental Planner, City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

Dear Ms. Blake:

On September 17, 2015, the Serra Mesa Planning Group (SMPG) voted to send you this letter. SMPG remains concerned with the lack of consideration for impacts to our community. The Stadium Reconstruction Project will be almost as close to residences in Serra Mesa (e.g., Goodwick Court) as residences in Mission Valley (e.g., Questor Place). The primary impacts to Serra Mesa include additional traffic from vehicles using Serra Mesa roads for stadium access, parking in the neighborhood (especially noticeable when the parking lot fills up), noise (e.g., fireworks) and air pollution.

Table 3-4 summarizes the current events and anticipated events. An analysis of the chart indicates that the following events will have the most impact on Serra Mesa: NFL Post Season games, Poinsettia Bowl (33% increase), Holiday Bowl (20% increase), Mountain West Championship, soccer games (250% increase), and large events (250% increase). It's understandable that a new stadium will and should attract more events. But with an increase in the quantity of events, it's understandable that the impacts go beyond the existing conditions.

Additional seats within the stadium for special events combined with the removal of about 2,370 parking spots between the current stadium and proposed reconstruction project will no doubt bring added impacts to Serra Mesa in the areas of traffic and parking. Also, since Serra Mesa roads are used for access to and from the stadium the 1300% increase in Medium Events will impact Serra Mesa. We are extremely concerned that these impacts were not studied or included in the draft EIR.

One would assume the reason to move the stadium on the lot is for another project, the San Diego River area redevelopment for commercial development and high density housing. Although the project under consideration in the draft EIR does not include any other land uses (i.e. residential, parking garages, commercial/retail, etc.) as have been proposed in the media, we request confirmation that should these uses be proposed in the future, a full EIR will be required and the impacts to Serra Mesa will be considered. And, in the event a full EIR is required, will the additional impacts combined with event/game activity be studied?

In conclusion, the relocation of the stadium to the northeast corner of the site, the increase in the number of events, the increase in the number of seats for special events, and the reduction of parking spaces will greatly impact Serra Mesa. These impacts must be studied. Specific comments and questions are attached.

Sincerely,



Cindy Moore
Chair, Serra Mesa Planning Group

Chapter 4.0 Environmental Impacts

4.1 Air Quality and Odor

Sensitive Receptors (p. 4.1-12) – Gethsemane Christian Preschool, 2696 Melbourne Drive, is not mentioned as a school in the vicinity of the Project site.

This preschool should be included in the analysis due to the potential for negative environmental impacts regarding air quality.

Issue 5: Would the project exceed 100 pounds per day of PM₁₀ dust?

Significance of Impacts (p. 4.1-35)

The operations phase of the Project would otherwise result in emissions of PM in excess 100 pounds for those additional events that would occur as a result of the new stadium. There are homes located on Mission Village Drive and 700 feet to the north of the proposed new stadium.

Since it appears that the residential areas in Serra Mesa were not considered in this analysis given the close proximity to the stadium, the EIR should provide an analysis of the potential dust impacts and as well as mitigation measures. If the residential area of Serra Mesa was studied, what would be the impacts and the mitigation measures for the impacted residences?

4.10 Mobility

4.10.1 Existing Conditions

Study Area, Site Access and Parking, Existing Roadway Network (p. 4.10-1)

Currently, on game and major event days, traffic impacts are not only felt on Friars Road, but also throughout Serra Mesa. Serra Mesa is used as a main access route to and from the stadium. Streets commonly used are Murray Ridge, Raejean, Greyling, Sandrock, Hammond, Gramercy, Ruffin, and Mission Village Drive. Vehicles in the middle lane when exiting from the main gate are directed north on Mission Village Drive. Vehicles headed for I-805 or Mission Valley via Mission Center Road continue on Gramercy and use Greyling and Raejean or Sandrock or Hammond, and onto Murray Ridge; or if headed for I-15 or Kearny Mesa they turn onto Ruffin Road and Aero. Additionally, people use side streets, especially Marathon.

It appears that the streets mentioned above were not included in the existing conditions analysis. Given the impacts to Serra Mesa, the EIR needs to include an analysis of the impacts and provide the necessary mitigation measures.

Existing Parking Facilities (p. 4.10-11)

As parking is already insufficient, the residential community along and off of Mission Village Road experiences a high number of parked cars as people park and walk down to the stadium. As stated in the draft EIR, more than 1/4 of the parking spaces (2,370 spaces) will be reallocated to the reconstruction project once it is initiated. With such a large number of spaces lost, there will be a greater number of stadium attendees parking in Serra Mesa during an event. We should not assume that San Diegans will migrate in large numbers to mass transit, especially when there are "no cost" areas nearby to park.

Therefore, this relocation, presumably to provide space for future riverfront redevelopment, will adversely impact nearby neighborhoods once parking spaces are lost.

Since it is quite common for people to park in the Serra Mesa neighborhood the description should have mentioned parking in the residential area, analyzed the impacts and provided necessary mitigation measures.

Travel Demand Model (p. 4.10-25)

Bike and Walk Trips - “Some attendees from the surrounding neighborhoods could reasonably bike or walk to the Project site, although consider to be a minimal number. Approximately 1% of the attendee trips or 700 people are estimated to bike or walk to the project site...” (p.4.10-29). One of the surrounding neighborhoods is Serra Mesa. It’s common for people to park and walk in Serra Mesa.

How was the 1% estimate determined? The Serra Mesa area should be studied.

Future Trip Generation (p. 4.10-25)

The game trip generation is evaluated.

What about the projected increase in the number of events for the Project?

Cumulative Projects (p. 4.10-37)

An approved development project located in Serra Mesa, approximately 1½ miles from the Project, for 160 multifamily housing units and 15,000 s.f. of retail at the corner of Ruffin and Gramercy, 9294 Gramercy Drive, wasn’t mentioned.

This development should be mentioned.

Issue 4: Would the project result in an increased demand for off-site parking or a substantial impact on existing parking?

Impact Analysis (p. 4-10-73): “...Attendees would be encouraged to take the trolley to reduce parking demand. The Project would not significantly impact the existing parking in adjacent residential areas near the Project site.” Qualcomm Stadium events already impact the residential streets of Serra Mesa.

Since there will be a reduction in parking spaces the EIR should provide an analysis of the impact on residential streets and provide the necessary mitigation measures.

4.10.4 Mitigation, Monitoring and Reporting (p. 4.10-75)

Mitigations aren’t listed for the impacts on Serra Mesa streets.

What would be the mitigation for impacts on Serra Mesa streets if these streets were included in the evaluation? An analysis and mitigation should be included.

4.11 Noise

If there are two stadiums, what would be the noise impact?

Does the design of the stadium impact noise? For example, the “dome speaks” at the San Diego Central Library. What can be expected from the stadium reconstruction design?

Operation

Methodology (p. 4.11-25)

Crowd noise was determined using data from an NFL games at Candlestick Park (Draft EIR City of Santa Clara 2009). That data may no longer be valid. Crowd behavior at games has become very spirited with competition to become the noisiest.

Why isn't a study being conducted during a Chargers game, which would provide more accurate data?

Would the weather impact the results of a noise study? What about wind?

Operational Noise (p. 4.11-35)

The decision to locate the new stadium near the Northeast corner of the lot would certainly bring the noise generated closer to Serra Mesa residents.

Would noise from the Project impact the residences on Mission Village Drive? The EIR should provide an analysis of noise impact on Mission Village Drive and provide the necessary mitigation measures.

“...the net increase in ambient noise levels at all of the ambient monitoring locations (i.e., residences) was less than a significant increase in ambient noise levels (i.e., less than a 3 dBA L_{eg} increase), except a 4 dBA L_{eg} increase at LT-2 from a concert event at the Project site” (p. 4.11-26). LT-2 is located in Serra Mesa.

Mitigation measures should be provided for those residences. For example, there are residences around the San Diego County Regional Airport that have received sound attenuation improvements.

Chapter 5.0 Cumulative Impacts

Cumulative Project List (p. 5-2)

An approved development project located in Serra Mesa, approximately 1½ miles from the Project, for 160 multifamily housing units and 15,000 s.f. of retail at the corner of Ruffin and Gramercy, 9294 Gramercy Drive, should be mentioned. Other developments in Mission Valley located further away were included. Serra Mesa has minimal retail so many residents in Serra Mesa travel to Mission Valley for shopping (e.g., Costco) and entertainment.

This Serra Mesa development should be included.

Mobility (Circulation) (p. 5-22)

Although Serra Mesa roads are used extensively for access to Qualcomm Stadium, they were not included in the traffic analysis.

What would be the cumulative impacts if they had been included? Given the impacts to Serra Mesa, the EIR needs to include an analysis of the impacts and provide the necessary mitigation measures.

Noise (p. 5-22)

Additionally, Project operational noise levels would potentially result in a significant permanent increase in ambient noise levels (3 dBA L_{eg} increase or greater) at noise sensitive receptors during concert events.

Mitigation measures should be provided for those residences. For example, there are residences around the San Diego County Regional Airport that have received sound attenuation improvements.

The decision to locate the new stadium near the Northeast corner of the lot would certainly bring the noise generated closer to Serra Mesa residents.

Would noise from the Project impact the residences on Mission Village Drive? The EIR should provide an analysis of noise impact on Mission Village Drive and provide the necessary mitigation measures.

Chapter 8.0 Alternatives to the Project

8.3.1 Alternative 1 – Qualcomm Stadium Site Northwest

Traffic/Circulation (p. 8-21)

Serra Mesa is used as a main access route to and from the stadium. Streets commonly used are Murray Ridge, Raejean, Greyling, Sandrock, Hammond, Gramercy, Ruffin, and Mission Village Drive. Additionally, people use side streets, especially Marathon. This will exacerbate as more development proceeds in Mission Valley and congestion increases.

Where would the new gate be located? It appears that the streets mentioned above were not included in the analysis. The impact to Serra Mesa streets needs to be studied and mitigation measures provided.

Noise (p. 8-21)

The decision to locate the new stadium near the Northwest corner of the lot would certainly bring the noise generated closer to Serra Mesa residents.

Mitigation measures should be provided for those residences. For example, there are residences around the San Diego County Regional Airport that have received sound attenuation improvements.

8.3.4 Alternative 4a Construction of a new stadium in the northeast corner of the site with Retention of the Existing Qualcomm Stadium (p. 8-34)

If both stadiums had events at the same time what would be the impacts (e.g., noise, traffic, air)? Details haven't been included.

Noise – the study that indicated that there would be an impact on the residences for concerts should be mentioned.