

NOISE SUPPLEMENTAL MEMORANDUM

To: Greg Shannon, Midway Rising, LLC
From: Sharon Toland, Principal Technical Specialist
RE: Privately Owned Parcels and Effects on the Noise Analysis
Date: October 18, 2024
CC: Kelsey Hawkins, Project Manager, and Diane Sandman, EPC Vice President, Harris & Associates

The purpose of this memorandum is to address changes to the Midway Rising Project (Project) made following the completion of noise modeling provided in the Noise Technical Report for the Midway Rising Project (Noise Report). Modeling assumes development of 2.85 acres of privately owned parcels on the south side of Kurtz Street at 3467, 3487, and 3495 Kurtz Street. The noise modeling assumed the privately owned parcels would be developed with 373 market-rate dwelling units, 10,000 square feet of commercial land use, a 3,500-seat theater, and a parking garage containing 707 parking stalls. Following the completion of noise modeling, the privately owned parcels were removed from the Specific Plan and are no longer part of the Project. Removal of the privately owned parcels from the Project reduces the overall construction required, as well as operational vehicle trips during the Phase 1 interim and buildout scenarios, and on-site activity. The following sections compare conclusions of the Noise Report to the scenario currently proposed where the privately owned parcels have been removed from the Project to demonstrate that the Noise Report represents a conservative analysis for the Project. The study site plan refers to the site plan used for Noise Report modeling that included the privately owned parcels. The Project without the privately owned parcels is referred to as modified site plan.

This memorandum incorporates the findings of two traffic memorandums prepared by Kimley-Horn related to the effect of removal of the privately owned parcels: (1) EIR Appendix D2: Midway Rising [PRJ-1106734]: Privately Owned Parcels and Effects on the Vehicle Miles Traveled Analysis, and (2) EIR Appendix D1: Midway Rising [PRJ-1106734]: Privately Owned Parcels and Effects on the Local Mobility Analysis. These memorandums include a review of the previously completed Vehicle Miles Traveled Analysis and Local Mobility Analysis that are based on the site plan that included the privately owned parcels. Kimley-Horn determined that the conclusions of the previously completed Vehicle Miles Traveled Analysis and Local Mobility Analysis remained valid with removal of the privately owned parcels. The Vehicle Miles Traveled Analysis and Local Mobility Analysis, based on the study site with the privately owned parcels, provide a conservative analysis of potential Project impacts, and revised traffic modeling was determined not to be necessary.

Threshold 1: Increases in Ambient Vehicle Noise Levels

The Noise Report determined that the Project would increase ambient vehicle noise levels on the Project site. Noise modeling is based on traffic volumes provided in the Local Mobility Analysis (Appendix D1), with the exception of one segment: Sports Arena Boulevard from West Point Loma Boulevard to Hancock Street, as described below. The Noise Report determined that the Project would not cause any segment to exceed

the 65 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL), or result in a more than 3 decibel (dB) CNEL increase on any roadway segment that would exceed 65 dBA CNEL without the Project. As such, the study site plan, which includes the development of the privately owned parcels, did not result in traffic volumes that would exceed the City of San Diego (City) thresholds for increases in ambient traffic noise. The Project was also evaluated against the Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report standard of a readily perceptible (more than 5 dBA CNEL) increase in noise level of roadways that do not exceed 65 dBA. The study site plan was determined to result in a more than 5 dBA increase in noise level on Kurtz Street from Hancock Street to Frontier Drive and on Hancock Street from Sports Arena Boulevard to Kurtz Street. However, noise levels would remain compatible with existing development, including sensitive receptors, and the change in noise level on Hancock Street would not be readily perceptible when ambient freeway noise is taken into consideration.

Kimley-Horn calculated that the modified site plan would result in a net decrease of 2,864 daily vehicle trips compared to the study site plan at buildout (Appendix D2) because the elimination of the privately owned parcels would eliminate vehicle trips from 373 dwelling units, 10,000 square feet of commercial land use, and a 3,500-seat theater. Phase 1 interim development would also decrease from 1,242 units to 875 units, and commercial development would be reduced from 100,888 square feet to 90,888 square feet, and associated traffic would also be reduced. As such, the modified site plan contribution to ambient noise levels would be reduced compared to study site plan noise levels. Modeled noise levels, which assumed development of the privately owned parcels, did not result in a significant impact. Therefore, the removal of the privately owned parcels would not result in a significant impact. No new increases in ambient noise levels would occur as a result of removal of the privately owned parcels from the Project. There would be no change in the conclusion regarding increases to ambient noise levels as a result of removal of the privately owned parcels from the Project.

As noted above, Sports Arena Boulevard from West Point Loma Boulevard to Hancock Street was not modeled based on the data in the Local Mobility Analysis for the study site plan. Due to the proximity of sensitive receptors to this major roadway, buildout (Year 2035) traffic volumes for the segment of Sports Arena Boulevard from West Point Loma Boulevard to Hancock Street were calculated using traffic data that reflected the modified site plan (Noise Report Appendix F, Sports Arena Boulevard Traffic Volumes Memorandum). As such, the Noise Report reflects the removal of the privately owned parcels from the Project. As detailed therein, impacts to this segment were determined to be less than significant.

Threshold 2: Transportation Noise

As identified in the Noise Report, vehicle noise levels with implementation of the study site plan would have the potential to exceed the noise compatibility standard for proposed sensitive receptors of 65 dBA CNEL up to 285 feet from the centerline of modeled roadway segments of Sports Arena Boulevard, and up to 53 feet on modeled segments of Kurtz Street, Hancock Street, Frontier Drive, and Kemper Street. However, noise levels would be within conditionally compatible standards, and compliance with existing state and City requirements would ensure that future interior noise levels would be consistent with the City interior noise compatibility standard of 45 dBA CNEL. This impact would be less than significant.

As discussed under Threshold 1, the modified site plan would result in a net reduction in vehicle trips compared to the study site plan because total development would be reduced. The reduction in vehicle trips would incrementally reduce ambient vehicle noise levels compared to modeled noise levels because traffic volume would be reduced. As such, the areas that potentially would be exposed to noise levels in excess of the applicable noise compatibility standard would be similar or reduced under the modified site plan. Therefore, the Noise Report provides a conservative analysis of ambient roadway noise levels with Project implementation and there would be no change to the less than significant impact as a result of removal of the privately owned parcels from the Project.

Threshold 3: Airport Compatibility

The Project site is partially within the 60-65 dBA CNEL noise contour for San Diego International Airport. However, existing requirements would ensure interior noise levels do not exceed 45 DBA CNEL, as demonstrated through submittal of a Title 24 Compliance Report and an Airport Land Use Commission Consistency Determination Application. As such, impacts would be less than significant.

The modified site plan would reduce total Project development compared to the study site plan, but in and would not change the Project location or introduce any new sensitive receptors to the Project area. As such, there would be no change to the less than significant impact related to airport compatibility as a result of removal of the privately owned parcels from the Project.

Threshold 4: Noise Ordinance Compliance

Noise from the Project including the theater that was initially proposed for the privately owned parcels, was determined to be less than significant for the study site plan in the Noise Report. The modified site plan would reduce the overall increase in noise from human activity compared to the study site plan. Although the modified site plan would reduce indoor event capacity associated with the 3,500-seat theater, the maximum outdoor event capacity would be the same as the study site plan, which would result in a potentially significant impact. As such, there would be no change to the conclusion related to noise ordinance compliance as a result of removal of the privately owned parcels from the Project. Mitigation measure NOI-1 would continue to be required and impacts would still be significant and unavoidable.

Threshold 5: Temporary Construction Noise

The modified site plan would reduce the total Project construction effort compared to study site plan assumptions, including a reduction of 2.85 acres of disturbance area, approximately 6,000 cubic yards of fill, and 84,000 square feet of building demolition. As such, the total number of working days, grading area, and truck trips would be incrementally reduced compared to the analysis included in the Noise Report. However, there would be no change to the anticipated construction equipment fleet or maximum anticipated daily vehicle and truck trips. Construction noise levels would be the same as the study site plan but no construction would not occur within the privately owned parcels. The potential impact area of 170 feet from active construction would be the same, but the screening distance would shift on the northern boundary of the Project site because the privately owned parcels would no longer be part of the construction area. The privately owned parcels would now fall within the revised 170-foot impact screening distance; however, these parcels are developed with commercial land uses, which are not considered sensitive receptors. Existing sensitive receptors would continue to be located within 170 feet of the Project site and off-site improvement areas and there would therefore be no change to the conclusion related to construction equipment noise as a result of removal of the privately owned parcels from the Project. Mitigation measure NOI-2 would continue to be required.

Regarding construction traffic, there would be no change to maximum daily construction traffic as a result of the modified site plan because maximum daily construction efforts, including demolition and earthwork, are anticipated to continue to occur as a result of development outside of the privately owned parcels. Development of the privately owned parcels was anticipated to occur in Phase 2 and thus operation of new development on those sites was not anticipated to overlap with peak construction. As a result, there would be no change to the modeled interim construction scenario that included operation of Phase 1 development and Phase 2 construction. There would be no change to the less than significant impact related to ambient noise from construction traffic because the modified site plan would not result in any increase to traffic volumes during Project construction.

Threshold 6: Vibration

The modified site plan would require the same construction fleet as the study site plan, and vibration levels would therefore be same as the study site plan. However, construction vibration would not occur within the privately owned parcels, and the potential impact area would shift on the northern boundary of the Project site. The privately owned parcels would now fall within the revised potential impact screening distance of 230 feet; however, these parcels do not contain existing vibration-sensitive uses. Existing vibration-sensitive receptors would continue to be located within 230 feet of the Project site on Sports Arena Boulevard. As a result, there would be no change to the conclusion related to construction with the modified site plan because the privately owned parcels are not within 230 feet of a vibration sensitive receptor. Removal of the parcels from the construction area would not eliminate impacts to any identified receptors. Mitigation measure NOI-3 would continue to be required, which would reduce impacts to less than significant.

Regarding operation, the modified site plan would reduce overall development and would not result in development of any new sources of operational vibration. There would be no change to the conclusion related to vibration during operation.

Conclusion

The modified site plan would reduce total construction, daily operation on the Project site, and daily vehicle trip generation compared to the study site plan. As such, the study site plan analysis adequately and conservatively analyzes the impacts that would occur. The conclusions of the Noise Report remain valid and do not need to be updated as a result of removal of the privately owned parcels from the Project.