

Serra Mesa Planning Group

Post Office Box 23315 San Diego, CA 92193

November 14, 2008

City Councilmember Scott Peters
District One
202 C Street
San Diego, CA 92101

Dear Councilmember Peters:

The Serra Mesa Planning Group asks that you not approve this Palladium at Aero project as currently proposed, not certify the Mitigated Negative Declaration, not approve the proposed rezone or Public Right-of-Way vacation, and continue the proposed Community Plan Amendment.

This is a crucial project for Serra Mesa, as it sits on a site that defines the primary gateway between our community and Kearny Mesa. The project takes on major importance because it is the first of what City Staff wants to see in redevelopment in both directions from the project along Aero Drive, and so will set the tone and precedence. It must be done right. As proposed, the project will radically transform the character of our community in a way that the community does not support.

Attached is an information booklet detailing our concerns and providing extensive supporting documentation for our position.

This project has been discussed openly and extensively at Palladium Subcommittee, Serra Mesa Planning Group, and special meetings. Information has been disseminated in articles in the *Serra Mesa Observer* (Serra Mesa Community Council newsletter) and in flyers distributed to the most affected residents. The Serra Mesa Planning Group has repeatedly voted against this project, and collected over 130 signatures from immediate neighbors opposing the project.

Although the Kearny Mesa Planning Group voted in favor of the project, it should be noted that only one of those voting members, Buzz Gibbs, represents an area south of Montgomery Field (in the vicinity of the project), and Buzz voted against the project. Additionally, the project that KMPG supported was later rejected by Planning Commission.

I will attempt to summarize our main points here:

The bulk, scale, style, and setback of the project are incompatible with the City of San Diego General Plan, the Kearny Mesa Community Plan, and the Serra Mesa Community Plan.

This project will replace four relatively small, deeply set back, one- and two-story buildings with a single, massive, up to 6-story structure, extending into the existing public right-of-way, with a completely new architectural style. Yet the MND states “The proposed project... would not result in a visual impact.”

The proposed density is incompatible with the Serra Mesa Community Plan and the surrounding neighborhoods in Serra Mesa and Kearny Mesa. Commissioners Golba and Griswold support this position.

The physical structure is 10 times larger than the average building along Aero Drive, and will have half as much street setback as the next closest building along Aero Drive.

The project does not provide adequate parking. Commissioner Griswold supports this position.

The project claims vicinity to 7 bus routes, but only 1 actually passes the site, and only 2 others are nearby. The other four are on the other side of the airport.

There is no street parking on Aero Drive.

The existing street parking in the adjacent single family neighborhood is already impacted.

The Streetscape Guidelines (CPA) have not been adequately prepared and reviewed.

This document will be incorporated into the Community Plan and will require an act of City Council to revise; we need to get them right the first time. Only Staff and the applicant had any input during their development, but they will guide all future projects along Aero Drive, which is proposed as a redevelopment corridor. Commissioner Otsuji had significant concerns with this document, which we feel have not been adequately addressed in the limited time allowed thus far.

The Mitigated Negative Declaration contains multiple flaws and is inadequate. An EIR should have been prepared.

The bulk and scale were not compared to existing conditions. The visual impact was ignored. The height analysis was based on a four story structure, despite the 6 story parking structure at the heart of the project. A shading study was not produced. Despite the adjacent active airfield, there was no study of air pollution.

CEQA Significance Determination Thresholds were met but not considered (see booklet p.22).

The MND states that one of the project sites historically used VOCs and petroleum products, and “further investigation and testing is needed.” However, no testing or studies were produced. The property immediately to the west of the project site has been tested and found to have contaminated soil and been deemed unsuitable for residences; this might also be true for the project site!

The MND failed to consider the noise impacts of airport operations at Montgomery Field, despite the fact that the Regional Airport Authority will require all tenants to sign a waiver acknowledging the noise and traffic and other operating hazards caused by airport operations. The MND states “an acoustical analysis would be required” and then goes on to state “a significant noise impact was not identified” without having performed the acoustical analysis!

The Traffic Study failed to study major thoroughfares through Serra Mesa, despite the fact that they are the shortest and most likely route for project residents to reach prime destinations in Mission Valley, and for Kearny Mesa residents to reach schools in Serra Mesa.

The Traffic Study also failed to analyze cumulative impacts, despite the fact that the project is in the center of an area considered to be underutilized and prime for redevelopment (see West Aero Drive Land Use Study, also revised as a part of this project).

Additionally, the Traffic Study did not consider traffic impacts due to construction, which would likely drive traffic off of Aero Drive and onto the neighborhood streets past two schools.

The findings for the Site Development Permit are not met.

The project is inconsistent with the General Plan, the SM and KM Community Plans, and the WADLUS. The proposed zoning is inappropriately high. The proposed setbacks are inadequate. These concerns are detailed and extensively supported in our booklet on pages 23 to 27.

In short, this project is not ready for approval. It has page after page of issues that prevent it from being the successful, landmark project that deserves to go on this site.

If you have questions or concerns, please do not hesitate to contact James Feinberg, XXXXXXXXXXXXXXX; or Cindy Moore, XXXXXXXXXXXXXXX.

Thank you for your consideration,

James Feinberg
Vice Chair, Serra Mesa Planning Group
Chair, SMPG Palladium Subcommittee