

March 18, 2025

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Subject: Midway Rising Project Visual Analysis

The purpose of this visual analysis is to evaluate and document the potential visual impacts resulting from the approval and implementation of the Midway Rising Project (Project), located in the City of San Diego (City).

Introduction

The Project proposes mixed-use development in a Transit Priority Area¹ (City of San Diego 2024). Consistent with Senate Bill 743, the potential aesthetic or visual impacts of the Project are not considered significant impacts on the environment for the purposes of compliance with the California Environmental Quality Act (CEQA).² This visual analysis was prepared to disclose potential visual changes associated with the Project, not to evaluate significant impacts under CEQA.

This visual analysis identifies the existing visual environment, applicable planning documents, key public viewpoints, viewer types, and anticipated viewer responses. Potential visual impacts are assessed by comparing the anticipated visual change to the existing visual environment from Project implementation based on a conceptual reasonably probable and realistic buildout scenario.³ This information is presented as follows:

- **Introduction** identifies the Project location, Project description, regulatory setting that guides future development on the Project site, and methodology used in this analysis to assess visual impacts.
- **Visual Environment** describes the existing conditions of the visual environment (Project viewshed), types of viewers in the Project viewshed, and the 15 key viewpoints (KVPs) identified for assessment.
- **Visual Impacts** describes the degree of visual change that is expected to result from Project development (with buildings at the maximum height limit) at each of the 15 KVPs, considering viewer sensitivity and level of change.
- **Summary** provides a summary of the potential visual effects identified in the Visual Impacts section.
- **References** lists the references used to prepare this analysis.

Project Location

The Project is in the northernmost section of the Midway-Pacific Highway Community planning area of San Diego, California. The Project site is south of Mission Bay; west of Mission Valley, Old Town, and Mission Hills; north of Liberty Station and the San Diego International Airport; and east of Ocean Beach and Point Loma (Attachment 1, Figures; Figure 1, Regional Location).

¹ In accordance with Senate Bill 743, a Transit Priority Area is defined as “an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.322 of Title 23 of the Code of Federal Regulations.”

² California Public Resources Code Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment. A Transit Priority Area is defined as an area within 0.5 mile of a major transit stop that is existing or planned.

³ The Project includes implementation of the Midway Rising Specific Plan (www.sandiego.gov/real-estate-and-airport-management/midway-rising; www.midwayrising.info). Because the Specific Plan is not finalized, this visual analysis is based on a hypothetical reasonably probable and realistic buildout scenario.

The Project site encompasses approximately 49.23 acres of relatively flat (10 to 15 feet above mean sea level), developed land owned by the City and is generally characterized as a mix of commercial and entertainment uses. The Project site is generally bounded by Kurtz Street to the north, Sports Arena Boulevard to the south, Hancock Street in the northwestern corner, and commercial properties to the west and east, approximately aligned east of Greenwood Street (Figure 2, Project Site Location). Interstate (I-) 8 extends in an east-west direction north of the site and separates the site from the San Diego River and Mission Bay to the north.

The tallest existing structure on the Project site is the San Diego International Sports Arena (currently named Pechanga Arena) at approximately 70 feet above grade (Harris 2022). The maximum height limit in CC-3-6 zone is 65 feet.

Project Description

The Project would revitalize the Midway District neighborhood in the City by redeveloping the Project site with entertainment, retail, restaurant, residential, recreational, public, and park uses.

The Project includes the approval and implementation of the Midway Rising Specific Plan (Specific Plan), which provides guidance and direction on land use, development standards, site planning, building design, and landscape design, and centers on five key elements: housing, open space, entertainment, retail, and mobility.

The Project would include the following mixed-use development across the site:

- **Housing.** The Project would include up to 4,254 housing units, including affordable units, to provide a variety of housing opportunities and contribute toward improving housing affordability in the City.
- **Retail/Entertainment.** The Project would include up to 130,000 square feet of new retail space. It would also include a new 16,000-seat entertainment center on the eastern end of the site.
- **Public Space.** A central organizing element would be a network of park and public spaces consisting of approximately 14.54 acres that connects key land uses with each other and to the surrounding community.

Land uses in the Specific Plan would be zoned Community Village, and development would be divided into two phases: Phase 1 would be east of Frontier Drive, and Phase 2 would be west of Frontier Drive.

Assessment Methodology

The methodology used to prepare this analysis is described below:

1. The existing visual environment and landscape characteristics on and surrounding the Project site were defined and documented.
2. Applicable planning documents were reviewed for relevant policy, regulations, and guidance information.
3. The viewshed boundary and KVPs of the Project site were identified based on public viewing locations and typical viewing conditions from outside the Project site.
4. The type and degree of visual changes expected to result from buildout of the Project were documented based on a hypothetical, reasonably probable, and realistic buildout scenario, whereby the majority of the Project site would be built out to the 105-foot maximum building height except for a 250-foot-tall high-rise building in the northwestern corner of the Project site (10 percent of the Specific Plan Area) and the 165-foot-tall entertainment center in the eastern area of the Project site.

The geographic limits for the visual analysis consist of the viewshed boundary, or the area from which the Project can be viewed. The viewshed boundary was determined through analysis of aerial maps. The character of the existing visual environment was then documented through field reconnaissance, photographic records, and aerial photograph interpretation. Viewers within the viewshed boundary were determined through field visits, land use maps, and other planning documents.

For this visual analysis, several KVPs were selected to represent public views from both public streets and publicly accessible areas based on the major viewers potentially affected by the Project. The KVPs were

determined by reviewing aerial maps and digital imagery of street views and conducting site visits to identify several perspectives and views of the Project site from public locations. A total of 15 KVPs as shown on Figure 3, Key Map, were identified for analysis.

This visual analysis is based on a hypothetical, reasonably probable, and realistic buildout scenario, whereby the majority of the Project site would be built out to the 105-foot maximum building height except for a high-rise building 250 feet in height on the northwestern corner of the Project site and the entertainment center with a height of 165 feet in the eastern area of the Project site. Photo simulations of the Project were created to support the analysis. This development scenario represents a “worst-case” analysis.

Safdie Rabines Architects prepared a georeferenced three-dimensional digital massing model of the Project site and its vicinity. The model was prepared to show the existing conditions, and the hypothetical, reasonably probable, and realistic buildout scenario of one illustrative development plan was created using computer-aided design software for two-dimensional and three-dimensional drawings.

Imaging software was used to align the computer model with the site photographs. The computer model was then superimposed over photographs from each KVP to create the visual simulations. The Project is shown in simple massing with no building detail or color to focus the viewer on the bulk and scale of the proposed development compared to the existing condition.

The computer-generated perspectives were used to analyze visual impacts by describing the anticipated change to views from the 15 KVPs. Visual impacts resulting from development of the Project were evaluated by viewing the existing visual character of the landscape from each KVP and assessing the degree to which the construction of buildings at maximum height limits on the Project site would change those views.

Visual Environment

Project Viewshed

A public viewshed is defined as the area visible from an observer’s viewpoint from a publicly accessible location, including the screening effects of intermediate vegetation and structures. Viewshed components include the underlying landform/topography (e.g., foothills, mountains, and flatlands) and the overlaying land cover (e.g., water features, vegetation, cultural sites, and buildings). For this visual analysis, the Project viewshed generally includes the Midway-Pacific Highway Community planning area where the Project site is located and portions of the following surrounding community planning areas: Old Town, Ocean Beach, Peninsula, Uptown, and Mission Bay Park.

The topography is generally flat throughout the Midway-Pacific Highway Community planning area. Topography varies in other portions of the viewshed, with elevated terrain in the Uptown and Peninsula Community planning areas and a portion of Old Town Community planning area.

The quality of views from surrounding areas toward the Project site varies from one location to another within the viewshed for many reasons: undulating terrain, urbanized level of development, mature vegetation growth, and elevation of roadways.

Viewers

Viewers are people whose views of the landscape may be altered by the Project. For this visual analysis, viewers consist of members of the public, such as recreational users, pedestrians, bicyclists, and motorists, with visual access to the areas in the Project viewshed.

Key Viewpoints

It is not practical or necessary to analyze all possible views of the Project site. Therefore, 15 representative KVPs were identified to demonstrate the change in public views from Project development. The representative KVPs are shown on Figure 3 and described in Table 1, Key Viewpoints. The identified KVPs are

locations accessible to the public (including residential neighborhoods, a golf course, and parks/trails) and have the highest potential to be affected by the Project.

Table 1. Key Viewpoints

| KVP | Location and Direction | Viewer | Visible Features |
|-----|--|--|---|
| 1 | View south from the Sea World Drive overpass | Motorist, pedestrian, bicyclist | Road, vegetation, buildings |
| 2 | View south from Fiesta Island Road | Recreational user, motorist, pedestrian, bicyclist | Road, water vegetation |
| 3 | View southeast from Old Sea World Drive | Recreational user, motorist, pedestrian, bicyclist | Open space, vegetation, buildings |
| 4 | View east from Robb Athletic Field | Recreational user, pedestrian, bicyclist | Road, open space, vegetation, buildings |
| 5 | View southeast from San Diego River Trail | Recreational user, pedestrian, bicyclist | Road, vegetation, buildings, arena |
| 6 | View west from Presidio Park | Recreational user | Road, parking, vegetation, buildings |
| 7 | View from I-5 and I-8 interchange | Motorist | Road, open space, vegetation, buildings |
| 8 | View northeast from Sports Arena Boulevard | Recreational user, motorist, pedestrian, bicyclist | Road, open space, vegetation, buildings |
| 9 | View northwest from Sports Arena Boulevard | Recreational user, motorist, pedestrian, bicyclist | Road, vegetation, buildings, arena |
| 10 | View west from 3253 Kurtz Street | Recreational user, motorist, pedestrian, bicyclist | Road, vegetation, buildings, arena |
| 11 | View west from Kurtz Street/Hancock Street intersection | Recreational user, motorist, pedestrian, bicyclist | Road, vegetation, buildings, arena |
| 12 | View northwest from Old Town Avenue Bridge | Motorist, pedestrian, bicyclist | Road, vegetation, buildings, arena |
| 13 | View north from Rosecrans Street/Lytton Street intersection | Recreational user, motorist, pedestrian, bicyclist | Road, vegetation, buildings, arena |
| 14 | View northeast from Kemper Street/Kenyon Street intersection | Recreational user, motorist, pedestrian, bicyclist | Road, vegetation, buildings |
| 15 | View east from Rialto Street/Famosa Boulevard intersection/West Point Loma Boulevard | Recreational user, motorist, pedestrian, bicyclist | Open space, vegetation, buildings |

Notes: I- = Interstate; KVP = key viewpoint
The KVPs correspond with Figures 3–18.

Visual Impacts

Short-term changes to views that occur during project construction are considered short-term visual changes. Phase 1 of construction would include the demolition of eight structures and asphalt parking lots east of the

proposed Frontier Drive and construction of a new entertainment center. The San Diego International Sports Arena would remain in place and operational during Phase 1 of construction and would be demolished in Phase 2. Short-term construction-related visual impacts would be temporary and would cease once construction is complete. Long-term changes are associated with altering the natural topography; building permanent structures (e.g., buildings, bridges, and walls); and removing vegetation, including mature trees. The focus of this analysis is on physical changes that would result in a visual impact to the environment.

The evaluation of visual changes is largely subjective and depends on the scenic quality of the area disturbed, degree of alteration, and sensitivity of viewers. The degree of alteration refers to the extent of changes to the natural landform and the introduction of urban elements into an existing natural environment while acknowledging any unique topographic formations or natural landmarks. Views for motorists and bicyclists are typically fleeting, particularly in an urban environment where the viewer's attention is focused on navigating and traffic. Views for recreational users and pedestrians are temporary due to the finite and impermanent nature of recreational and pedestrian use of an area.

For each of the 15 KVPs, the existing condition and proposed (hypothetical) condition from Project development is described and shown on the corresponding figure (Figures 4–18). For this analysis, sight distance is defined as foreground (zero to 0.25 mile), midground (0.25 to 3 miles), and background (3 miles and farther).

The level of change to the existing condition is based on the height and mass of buildings that would be viewed as a result of the Project.

The level of change is characterized using the following criteria:

- **None.** No perceivable change in visual quality caused by the Project.
- **Low.** Minor change in visual quality caused by the Project.
- **Moderate.** Moderate change in visual quality caused by the Project.
- **High.** Major change in visual quality caused by the Project.

Key Viewpoint 1: View South from Sea World Drive Overpass

Existing Condition

KVP 1 (Figure 4) represents the scene that is viewed looking south from the Sea World Drive overpass where it crosses I-5 toward the Project site. The foreground consists of the eastbound lanes of the Sea World Drive Bridge, the bridge guardrail, traffic on I-5 driving southbound under the Sea World Drive Bridge, and landscaping along the freeway and freeway on-ramp. Portions of sandy dune areas of Mission Bay and a small portion of Fiesta Island are visible in the center of the view in the midground. Buildings in the Midway-Pacific Highway Community planning area are visible in the left and center background view along with a glimpse of Mission Bay in the right background view. The horizon slopes gently to the west due to elevated areas of Point Loma in the Peninsula Community Plan.

Proposed Condition

Visual changes would generally occur in the background view. Foreground and midground views would not change. The Project would be visible along the horizon to the southwest. The distant views of Point Loma would be partially obstructed by the proposed development. A portion of the 165-foot entertainment center, the mid-rise mixed-use buildings (105 feet), and the 250-foot high-rise building in the center background view would be visible from KVP 1.

Viewer Sensitivity

KVP 1 represents a typical view from motorists traveling westbound on Sea World Drive and southbound on I-5. Viewers would notice a minor change in the view; however, the level of impact on view quality would depend on distance from their vantage point and the density and flow (speed) of traffic. There would be an

increase in sense of direction and destination given the concentrated presence of taller buildings in the direction travelers would be headed. The overall viewer response would be low because the new buildings would be in the background, the proposed development heights would primarily coincide with the existing horizon from this view, and views would be fleeting while driving.

Level of Change

Low.

Key Viewpoint 2: View South from Fiesta Island Road

Existing Condition

KVP 2 (Figure 5) represents the scene that is viewed looking south from the southern edge of Fiesta Island Road in Mission Bay toward the Project site. The foreground consists of sandy shoreline on Fiesta Island. The midground consists of water in Mission Bay. The background view includes landscaping across the water at South Shores Park, I-8, and palm trees along Sea World Drive. Buildings, including the San Diego International Sports Arena, are visible in the background view, although it is partially obstructed by palm trees/vegetation.

Proposed Condition

Visual changes would occur in the background view due to taller buildings. Foreground and midground views would not change. The most noticeable change would be the 250-foot high-rise building in the center background view. The proposed 165-foot entertainment center and 105-foot mid-rise mixed-use buildings would also be visible from this KVP. However, only the proposed high-rise building would exceed the horizon and change the view of the horizon. The remainder of the proposed development would be generally consistent with existing building heights to the west, although the development density would increase. The proposed development would be partially obstructed by intervening landscaping and trees. The Project would not obstruct views beyond the Project site due to the vantage point's distance from the site.

Viewer Sensitivity

KVP 2 represents a typical view from recreational users (bicyclists and pedestrians) and motorists on Fiesta Island Road and visitors at the shoreline. Despite the minor to moderate change in horizon, the development would neither obstruct views beyond the Project site due to the distance of the vantage point nor change the views in the foreground and midground, which attract recreational users to the area. In addition, the proposed development would be primarily in line with the hills of Point Loma to the west from this view. The overall viewer response would be low to moderate due to the majority of the proposed development being consistent with the tree line and only the high-rise building exceeding the existing horizon.

Level of Change

Low to moderate.

Key Viewpoint 3: View Southeast from Old Sea World Drive

Existing Condition

KVP 3 (Figure 6) represents the scene that is viewed from Old Sea World Drive looking southwest toward the Project site. Views include the San Diego River Estuary Dune Habitat and San Diego River in the foreground. In the midground, low-rise buildings directly across from the San Diego River, the San Diego International Sports Arena, and surrounding landscaping are visible. In the background, residential buildings at higher elevations in the Old Town and Uptown Community planning areas are visible to the left of the KVP. The skyline of Downtown San Diego can be seen farther in the distance toward the southeast, camouflaged by existing development, trees/landscaping, and haze.

Proposed Condition

Visual changes would occur in the midground view where the proposed development would exceed the existing horizon. The proposed 250-foot high-rise building and 105-foot mid-rise mixed-use buildings would partially obstruct distant views of Downtown San Diego and a portion of the higher elevation neighborhoods in the Old Town and Uptown Community planning areas. The 165-foot entertainment center would not be visible from this KVP. No changes to the foreground view would occur at KVP 3.

Viewer Sensitivity

KVP 3 represents a typical view from recreational users and motorists on Old Sea World Drive. Viewers would notice a minor to moderate change in the midground view and horizon beyond due to the proximity and heights of proposed development and lack of obstructions in the foreground. The overall viewer response would be low to moderate because recreational users and motorists are considered transient, and views can be fleeting when traveling along the roadway and paying attention to other vehicles.

Level of Change

Low to moderate.

Key Viewpoint 4: View East from Robb Athletic Field

Existing Condition

KVP 4 (Figure 7) represents the scene that is viewed eastward toward the Project site from Robb Athletic Field in the Ocean Beach Community planning area. Foreground views at this KVP are public space consisting of open lawn, landscaping, Robb Field Skate Park concrete and fencing, and vehicles and palm trees along Sunset Cliffs Boulevard. Midground and background views consist primarily of mature vegetation that hides existing buildings to the east. The Project site is in the center background view beyond the tree line and is not visible.

Proposed Condition

Visual changes would occur in background view, with a peek view of the upper floors of the 250-foot high-rise building visible in the center background view. A combination of intervening mature vegetation and existing development would obstruct the majority of the proposed development associated with the Project and minimize potential visual changes to the skyline.

Viewer Sensitivity

KVP 4 represents a typical view from recreational users at Robb Athletic Field. Views within the vicinity would not experience a major change as only the proposed high-rise building is slightly visible above the horizon. Views of Project development in the background would not be noticeable due to distance, intervening mature vegetation, and existing development blocking the majority of the Project development. The overall viewer response would be low.

Level of Change

Low.

Key Viewpoint 5: View Southeast from San Diego River Trail

Existing Condition

KVP 5 (Figure 8) represents the view from the pedestrian/bicycle San Diego River Trail that runs along I-8 to the north of the Project site. Landscaping along the northern side of I-8 is shown in the foreground. I-8 in the midground is slightly elevated between the trail to the north and the Project site to the south. Existing midground views south of I-8 include commercial buildings, aboveground utility lines, landscaping/palm

trees, and the San Diego International Sports Arena, which is the tallest existing building in the center midground view. High-rise buildings in Downtown San Diego are visible in the background view east of the arena.

Proposed Condition

Visual changes would occur in the midground view due to Project development. The view of the San Diego International Sports Arena would be replaced with Project development, including the 250-foot high-rise building and 105-foot mid-rise mixed-use buildings south of I-8. The horizon would be altered, and distant views of Downtown San Diego high-rise buildings would be blocked.

Viewer Sensitivity

KVP 5 represents a typical view from recreational users on the San Diego River Trail. Viewers would notice a major change in the view due to the proximity of Project development and the additional height and density of the proposed development. The overall viewer response would be high.

Level of Change

High.

Key Viewpoint 6: View West from Presidio Park

Existing Condition

KVP 6 (Figure 9) represents the view from Presidio Park in the Old Town San Diego Community planning area looking west toward the Project site. The park is atop a hill at a higher elevation than the Project site. The foreground view consists of mature vegetation within the park premises. The midground view includes Taylor Street, California Department of Transportation District 11 headquarters, I-5, the existing San Diego International Sports Arena, landscaping and trees, and commercial development within the Midway-Pacific Highway Community planning area. Distant views of lower-lying development are visible in the background view, including the Peninsula and Ocean Beach Community planning areas in the left background; San Diego River and bridges in the center background; and Mission Beach Community planning area, Mission Bay Park, Hyatt Hotel, and aboveground structures at the SeaWorld San Diego theme park in the right background. The Pacific Ocean establishes the horizon in this view.

Proposed Condition

Visual changes would occur to the left and center midground view. From left to right, the view would consist of the 165-foot entertainment center, 105-foot mid-rise mixed-use buildings, and 250-foot high-rise building. No change to the foreground view would occur. Little change would occur to the background view and horizon, with the exception of the 250-foot high-rise building, which would block a very small portion of the San Diego River view and slightly exceed the horizon. However, the proposed high-rise building is similar in height to the Hyatt Hotel and aboveground structures at the SeaWorld San Diego theme park, which are visible behind the tree to the right of the background view.

Viewer Sensitivity

KVP 6 represents a typical westward view from recreational users at Presidio Park. Park users would notice a moderate change in the view, but it is not considered a major change due to the distance, mature landscaping, and existing developed, built environment below and west of the park and on both sides of I-8. The overall viewer response would be moderate because of the visual changes to the midground and because the high-rise building would slightly exceed the horizon line.

Level of Change

Moderate.

Key Viewpoint 7: View West from I-5 and I-8 Interchange

Existing Condition

KVP 7 (Figure 10) represents the view looking southwest from the I-8 off-ramp as it exits to Camino Del Rio West/Rosecrans Street and I-5 South. The existing view includes primarily roadway, light poles, and freeway signage in the foreground, with vegetation, roadways, bridges, and low-lying buildings in the Midway-Pacific Community planning area in the midground. The existing San Diego International Sports Arena is visible in the midground in the center-right of the view. The Peninsula Community planning area and Point Loma create the horizon in the left and center background view. The right background view includes a peek view of the San Diego River along with distant development and mature vegetation/trees in the Mission Beach Community planning area and Mission Bay Park, including the Hyatt Hotel.

Proposed Condition

Visual changes would occur primarily in the midground view where, from left to right, the 165-foot entertainment center, 105-foot mid-rise mixed-use buildings, and 250-foot high-rise building would be visible beyond the freeway signage and mature trees/landscaping. No change to the foreground view would occur, and a minimal change to the horizon, with the exception of the 250-foot high-rise building, which would exceed the existing horizon, would occur. The majority of Project development, including the entertainment center and western mid-rise mixed-use buildings, would be at or below the horizon. The dense and mature foliage would provide partial coverage of the Project development.

Viewer Sensitivity

KVP 7 represents a typical view from a motorist looking southwest toward the Project site. The majority of the Project development, including the entertainment center and mid-rise mixed-use buildings, would generally not be visible above the horizon line, with the exception of the proposed high-rise building. The overall viewers would not notice a major change in the view due to the distance, mature landscaping, and speed at which motorists would be passing by. Viewer response would be low to moderate because the Project would be partially visible above the horizon line, and the Project would be visible in the center/middle of the view but mostly screened by vegetation.

Level of Change

Low to moderate.

Key Viewpoint 8: View Northeast from Sports Arena Boulevard

Existing Condition

KVP 8 (Figure 11) represents the view looking east along Sports Arena Boulevard. The Project site is along the northern side of Sports Arena Boulevard, and the existing view of the San Diego International Sports Arena is partially obstructed by eucalyptus trees. The foreground view consists of the roadway. From left to right, the midground view along the northern side of Sports Arena Boulevard consists of the roadway, commercial development, roadway bollards and landscaping, the existing San Diego International Sports Arena and surrounding parking areas, signage, and additional commercial development with signage. The midground view along the southern side of Sports Arena Boulevard consists of parked cars, commercial development, landscaping and street trees, signage, and billboards. Distant background views of the Linda Vista and Clairemont (Bay Park) Community planning areas are between the existing commercial building and the San Diego International Sports Arena to the left of the view. In the right of the background view, distant views of developed areas at higher elevations in the Old Town and Uptown Community planning areas are visible.

Proposed Condition

Due to the proximity of the Project site to this view location, visual changes would occur to most of the foreground, midground, and background views. Views would be replaced by the proposed 105-foot mid-rise mixed-use buildings, which would obstruct some of the horizon and view of the open sky. The distant background views of Linda Vista and Clairemont (Bay Park) Community planning areas would no longer be visible. The Project proposes bicycle and pedestrian pathways and landscaping, including street trees, that would soften views of the residential buildings. The distant views of developed areas at higher elevations in the Old Town and Uptown Community planning areas would remain and not be obstructed. The midground views traveling east on the southern side of Sports Arena Boulevard would also remain unobstructed.

Viewer Sensitivity

KVP 8 represents a typical view from motorists, bicyclists, and pedestrians on Sports Arena Boulevard. Viewers would notice a major change in the foreground and midground views due to the proximity, height, bulk, and scale of the Project development along Sports Arena Boulevard. The change to background views of neighboring community planning areas would be minor as these areas were already blocked by the existing development and mature trees. However, the overall viewer response would be high.

Level of Change

High.

Key Viewpoint 9: View Northwest from Sports Arena Boulevard

Existing Condition

KVP 9 (Figure 12) represents the view looking northwest along Sports Arena Boulevard near the intersection with Rosecrans Street. The Project site is along the northern side of Sports Arena Boulevard in the right of the view. Existing views of the developed area include the roadway, commercial buildings, street lighting, landscaping, billboards, and shopping center signage on the northern and southern sides of Sports Arena Boulevard. The existing San Diego International Sports Arena is slightly visible in the center left background view. An existing four-story parking structure is partially visible in the right of the view.

Proposed Condition

Due to the proximity of the Project site to this view location, visual changes would occur in the foreground, midground, and background views along the northern side of Sports Arena Boulevard. Specifically, the type of development would change from predominately single-story buildings to multi-story structures. At their maximum heights, the 105-foot mid-rise mixed-use buildings and 165-foot entertainment center would obstruct some of the horizon and views of the open sky. The Project proposes bicycle and pedestrian pathways and landscaping, including street trees, that would soften views of the on-site buildings and entertainment center. Views along the southern side of Sports Arena Boulevard and of the roadway would remain unchanged.

Viewer Sensitivity

KVP 9 represents a typical view from motorists, bicyclists, and pedestrians on Sports Arena Boulevard. Viewers would notice a major change in the foreground and midground views due to the proximity, height, bulk, and scale of the Project development along Sports Arena Boulevard. The overall viewer response would be high.

Level of Change

High.

Key Viewpoint 10: View West from 3253 Kurtz Street

Existing Condition

KVP 10 (Figure 13) represents the view from Kurtz Street looking west toward the Project site. The Project site is adjacent to Kurtz Street on the southern side. Existing foreground views include commercial buildings generally lacking architectural detail; the roadway; parked cars; driveways; sidewalks; overhead utility lines; and landscaping, including street trees. Midground and background views are partially obstructed by existing development.

Proposed Condition

Visual changes would occur in the foreground and midground views toward the northwest. Specifically, the type of development would change from predominately single-story buildings to multi-story structures. The proposed 165-foot entertainment center in the foreground view and 105-foot mid-rise mixed-use buildings in the midground would continue to obstruct part of the horizon and partially intrude on views of the open sky. The existing commercial and office buildings are barely visible in the midground along Kurtz Street. The 250-foot high-rise building would be visible in the distant midground view. The Project would include a multi-use path and landscaping, including street trees, along the southern side of Kurtz Street that would partially obstruct and soften views of the entertainment center and residential buildings.

Viewer Sensitivity

KVP 10 represents a typical view from motorists, bicyclists, and pedestrians on Kurtz Street. Viewers would notice a major change in the foreground and midground views due to the proximity and height of the Project development along Kurtz Street. Thus, the overall viewer response would be high.

Level of Change

High.

Key Viewpoint 11: View Southeast from Kurtz Street/Hancock Street Intersection

Existing Condition

KVP 11 (Figure 14) represents the view looking southeast toward the northwestern corner of the Project site. The view includes the Hancock Street and Kurtz Street intersection, a commercial building with signage, and landscaping in the left center of the view in the foreground view, as well as the chain-link fence at the northern edge of the Project site and overhead utility lines. The San Diego International Sports Arena, parking lots, and landscaping are visible in the midground view (right side of the photograph). The background view looks southeast down Kurtz Street toward distant buildings, overhead utility lines, and treetops. The majority of the built environment from this view consists of asphalt and buildings.

Proposed Condition

Visual changes would occur in the foreground and midground views along the southern side of Kurtz Street from the proposed development. The proposed 250-foot high-rise building, 105-foot mid-rise mixed-use buildings, and a small portion of the 165-foot entertainment center would obstruct the horizon and open sky visible along the southern side of Kurtz Street in the right of the view. The Project would implement landscaping, including street trees, that would soften ground level views of the proposed high-rise and residential buildings. The existing overhead utility lines on Hancock Street would remain in place.

Viewer Sensitivity

KVP 11 represents a typical view from a motorist or bicyclist on Hancock Street looking southeast toward the Project site. Viewers would notice a major change in the Project site due to the proximity, height, bulk, and

scale of the proposed 250-foot high-rise building and 105-foot mid-rise mixed-use buildings. The overall viewer response would be high.

Level of Change

High.

Key Viewpoint 12: View Northwest from Old Town Avenue Bridge

Existing Condition

KVP 12 (Figure 15) represents the elevated view from the Old Town Avenue Bridge over I-5 looking northwest toward the Project site. The existing view includes the Old Town Avenue Bridge in the foreground, including the back of a freeway sign attached to the northern side of the bridge (left view). The midground view consists of Naval Information Warfare Systems Command (NAVWAR) buildings stretching across the view from left to right, freeway landscaping and trees, overhead utility lines, and I-5 northbound and southbound lanes (right view). The NAVWAR buildings create most of the horizon line in this view. The Project site is in the background, behind the existing buildings, and is not visible in the existing condition.

Proposed Condition

Visual changes would occur in the background view, where the upper portions of the Project development would be visible behind the existing NAVWAR buildings and trees. Specifically, the 165-foot entertainment center and 250-foot high-rise building would be visible from this view. A change to the horizon due to Project development within the center of the view would occur.

Viewer Sensitivity

KVP 12 represents a typical view from motorists and pedestrians on the bridge looking northwest toward the Project site. Viewers would not notice a major change in the view due to distance, obstruction from the existing built environment (NAVWAR buildings), and fleeting views because motorists and bicyclists would be focused on driving and traffic. The overall viewer response would be low.

Level of Change

Low.

Key Viewpoint 13: View North from Rosecrans Street/Lytton Street Intersection

Existing Condition

KVP 13 (Figure 16) represents the view from the intersection of Rosecrans Street and Lytton Street looking northeast along Rosecrans Street in front of the Loma Club golf course. The existing view includes the roadway intersection with vehicles moving, a pedestrian striped crossing, and overhead lights; low-rise residential buildings; fencing and landscaping along the western side of Rosecrans; and a gas station, commercial buildings, and vegetation/trees along the eastern side of Rosecrans in the foreground and midground views. Views of the background and horizon are limited to distant trees and buildings (center view).

Proposed Condition

Visual changes would be limited to the background view, primarily to the horizon in the center background view. The top of the 165-foot entertainment center would be partially visible in the background but would not substantially change the view quality.

Viewer Sensitivity

KVP 13 represents a typical view from motorists, bicyclists, and pedestrians at the Rosecrans Street/Lytton Street intersection. Viewers would only notice a minor change in the view along the horizon in the center

background view. Due to distance, the existing vegetation, and the built environment between this view location and the Project site, the overall viewer response would be low.

Level of Change

Low.

Key Viewpoint 14: View Northeast from Kemper Street/Kenyon Street Intersection

Existing Condition

KVP 14 (Figure 17) represents the view from the intersection of Kemper Street and Kenyon Street looking northeast toward the Project site. The existing foreground view includes the roadway intersection with pedestrian striped crossings; commercial buildings, parking lots, trees, and landscaping along the western side of Kemper Street; and overhead utility lines, trees, landscaping, and low-rise residential buildings along the eastern side of Kemper Street. The existing San Diego International Sports Arena is partially visible in the midground view screened by the existing built environment and trees. The horizon consists of tall trees, light poles, and the tops of buildings, including the San Diego International Sports Arena.

Proposed Condition

Visual changes would occur in the midground view primarily to the horizon in the center of the view. The tops of the proposed 105-foot mid-rise mixed-use buildings and the 250-foot high-rise building would be partially visible in the background but would not substantially change the view quality. The view of the San Diego International Sports Arena would be replaced with the proposed development that would be partially screened by existing trees.

Viewer Sensitivity

KVP 14 represents a typical view from motorists, bicyclists, and pedestrians at the intersection of Kemper Street and Kenyon Street looking northwest toward the Project site. Viewers would not notice a major change in the background view with the development of Project buildings. Due to distance and existing vegetation and the existing built environment between this view location and the Project site, the overall viewer response would be low to moderate.

Level of Change

Low to moderate.

Key Viewpoint 15: View East from Famosa Slough at Rialto Street/Famosa Boulevard Intersection

Existing Condition

KVP 15 (Figure 18) represents the view from Famosa Slough State Marine Conservation Area at the Rialto Street/Famosa Boulevard intersection in the Peninsula Community planning area looking east toward the Project site. Famosa Slough, including wetlands, water, and vegetation, dominates the foreground view. The midground view, between the slough and the Project site in the background, is built out with low-rise residential and commercial buildings, trees, overhead utility lines, and higher elevations of the Peninsula Community planning area in the right of the view.

Proposed Condition

Visual changes would occur in the background center view. The upper floors of the proposed 250-foot high-rise building and 105-foot mid-rise mixed-use buildings would be visible in the center background view but would not substantially change the view quality. Elevated areas in the Peninsula Community planning area toward the southeast and overhead utility lines and trees would partially obstruct views of the Project

buildings. The high-rise building height would align with the tops of existing trees and the horizon to the right of the view.

Viewer Sensitivity

KVP 15 represents a typical view from recreational users of Famosa Slough State Marine Conservation Area and from bicyclists, pedestrians, and motorists within the vicinity of Famosa Boulevard. Viewers would not notice a major change in the background view from the Project buildings. The elevated terrain of the Peninsula Community planning area, existing built environment, and trees/vegetation would partially obstruct the Project buildings from this view. The overall viewer response would be low to moderate.

Level of Change

Low to moderate.

Summary

This visual analysis compares the existing conditions and anticipated visual changes that would occur under the hypothetical reasonably probable and realistic buildout of the Project.

Project buildings (including the proposed 250-foot high-rise building, 105-foot mid-rise mixed-use buildings, and 165-foot entertainment center) would be constructed on relatively low ground (10 to 15 feet above mean sea level) and may have perceived adverse and beneficial effects on the scenic quality of the surrounding area.

Effects could include the intrusive nature of taller structures on existing views, resulting in a more densely built urban environment. Additional effects could include the creation of a visually distinct Entertainment Center District and revitalization of the Midway-Pacific Community planning area.

Table 2, Summary of Viewer Sensitivity and Level of Change at 15 Key Viewpoints, summarizes the visual analysis findings based on resources changes, viewer sensitivity, and significance of changes for the 15 KVPs.

Table 2. Summary of Viewer Sensitivity and Level of Change at 15 Key Viewpoints

| KVP | Location and Direction | Viewer Sensitivity and Level of Change |
|------------|--|---|
| 1 | View south from the Sea World Drive overpass | Low |
| 2 | View south from Fiesta Island Road | Low to moderate |
| 3 | View southeast from Old Sea World Drive | Low to moderate |
| 4 | View east from Robb Athletic Field | Low |
| 5 | View southeast from San Diego River Trail | High |
| 6 | View west from Presidio Park | Moderate |
| 7 | View from I-5 and I-8 interchange | Low to moderate |
| 8 | View northeast from Sports Arena Boulevard | High |
| 9 | View northwest from Sports Arena Boulevard | High |
| 10 | View west from 3253 Kurtz Street | High |
| 11 | View west from Kurtz Street/Hancock Street intersection | High |
| 12 | View northwest from Old Town Avenue Bridge | Low |
| 13 | View north from Rosecrans Street/Lytton Street intersection | Low |
| 14 | View northeast from Kemper Street/Kenyon Street intersection | Low to moderate |
| 15 | View east from Rialto Street/Famosa Boulevard intersection/West Point Loma Boulevard | Low to moderate |

If you have any questions regarding this letter report, please contact Diane Sandman at (619) 481-5001 or Diane.Sandman@WeAreHarris.com.

Sincerely,



Diane Sandman, AICP
Vice President, Environmental + Planning Consulting



Kelsey Hawkins
Project Manager, Environmental + Planning Consulting

Attachments

1, Figures

References

City of San Diego. 2024. "Transit Priority Areas (TPA)." Accessed March 2025.

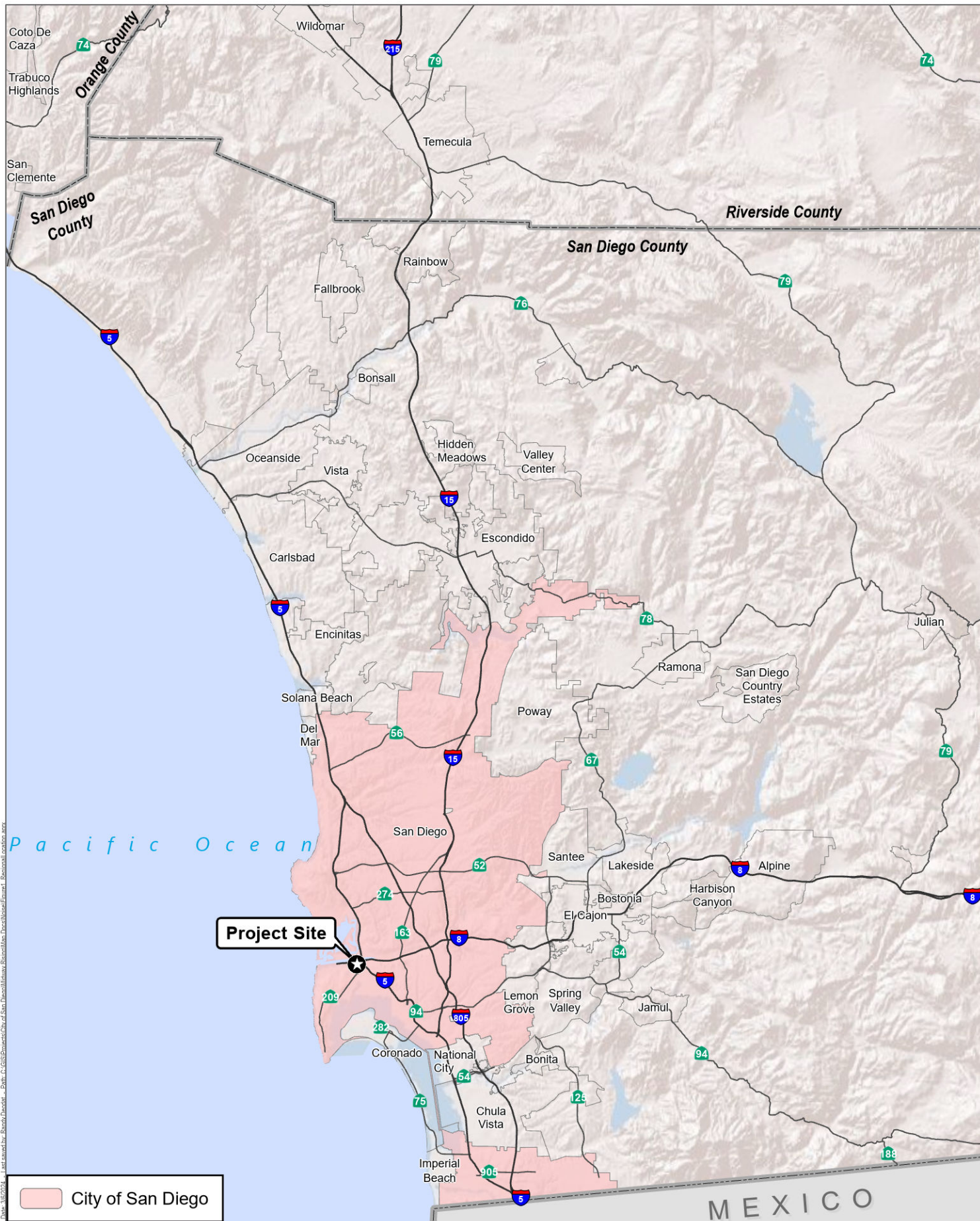
<https://webmaps.sandiego.gov/portal/apps/webappviewer/index.html?id=4efd01a2e06246adb36122fcf136f95d>.

Harris (Harris & Associates). 2022. Visual Impact Analysis for the Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit. Prepared for the City of San Diego. March 29.

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Attachment 1. Figures

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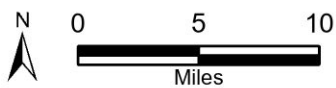


Figure 1
 Regional Location
 Midway Rising



Date: 7/2/2024 - File saved by: Randy Doozit - Path: C:\GIS\Project\City of San Diego\Midway Rising\MapDocs\VisualImpactAnalysis\Figure 2 - Project Location.mxd

Project Site
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Figure 2
 Project Site Location
 Midway Rising

Key Map



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Source: CityThinkers 2024.

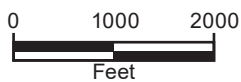


Figure 3

Key Map

Midway Rising

Existing Condition



Proposed Condition



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Source: CityThinkers 2024.

Figure 4

KVP 1 - View South from the Sea World Drive Overpass

Midway Rising

Existing Condition



Proposed Condition



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Figure 5

KVP 2 - View South from Fiesta Island Road

Midway Rising

Existing Condition



Proposed Condition



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Figure 6

KVP 3 - View Southeast from Old Sea World Drive

Midway Rising

Existing Condition



Proposed Condition



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Figure 7
KVP 4 - View East from Robb Athletic Field
Midway Rising

Existing Condition



Proposed Condition



Source: CityThinkers 2024.

Figure 8

KVP 5 - View Southeast from San Diego River Trail

Midway Rising

Existing Condition



Proposed Condition



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Source: CityThinkers 2024.

Figure 9

KVP 6 - View West from Presidio Park

Midway Rising

Existing Condition



Proposed Condition



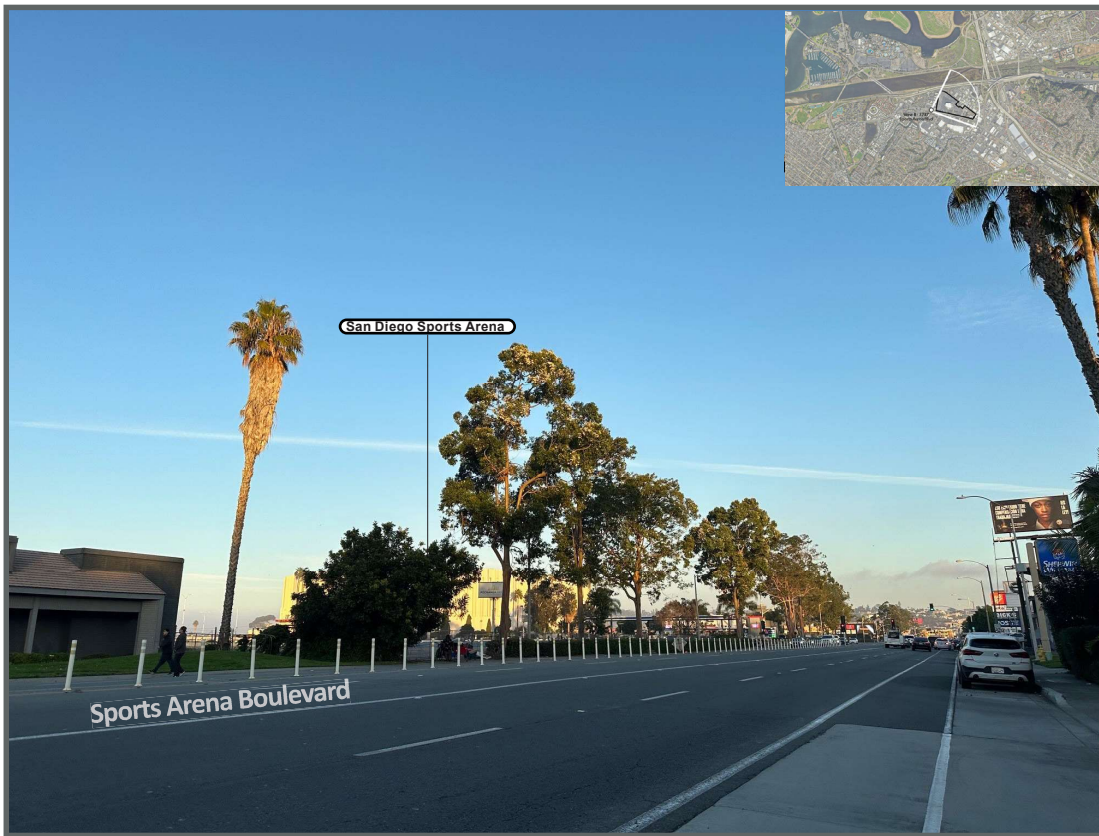
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Figure 10
KVP 7 - View from I-5 and I-8 Interchange

Midway Rising

Existing Condition



Proposed Condition



Source: CityThinkers 2024.

Figure 11

KVP 8 - View Northeast from Sports Arena Boulevard

Midway Rising

Existing Condition



Proposed Condition



Existing Condition



Proposed Condition



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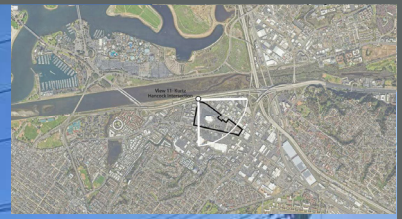
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Figure 13

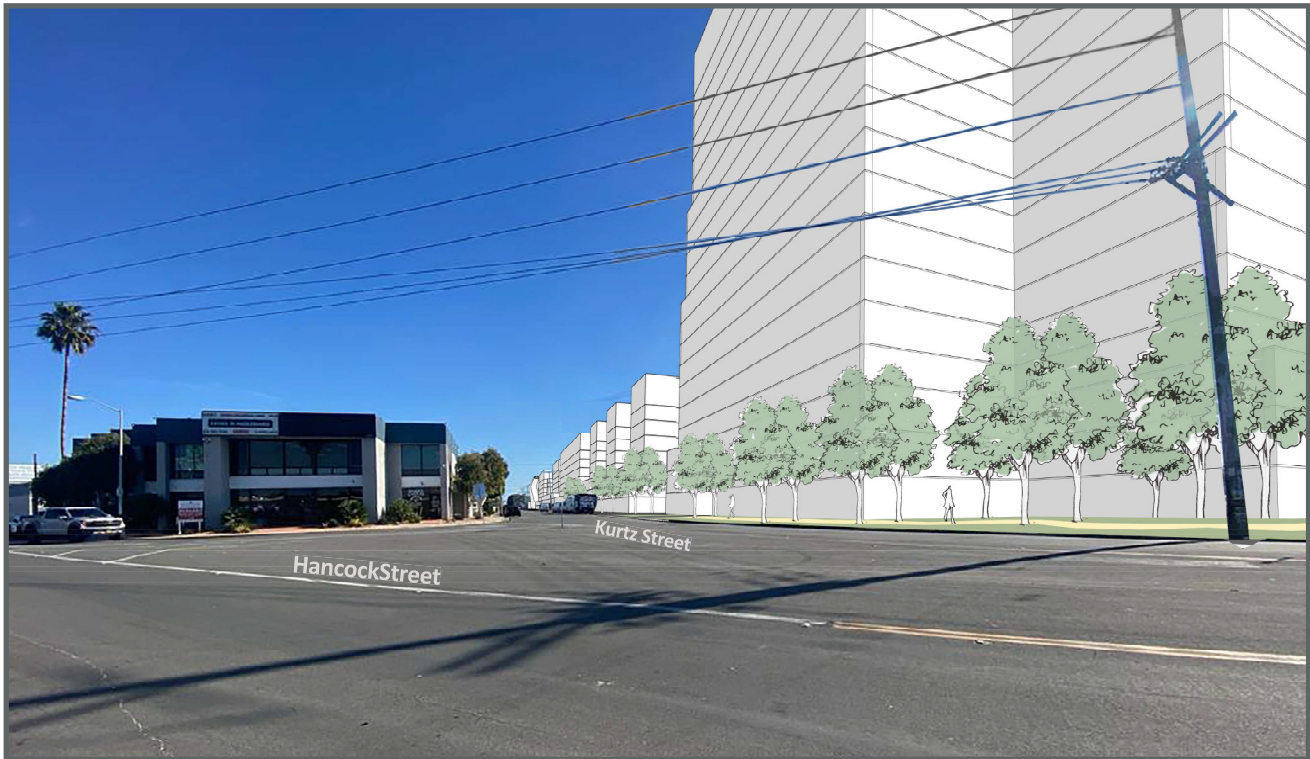
KVP 10 - View West from 3253 Kurtz Street

Midway Rising

Existing Condition



Proposed Condition



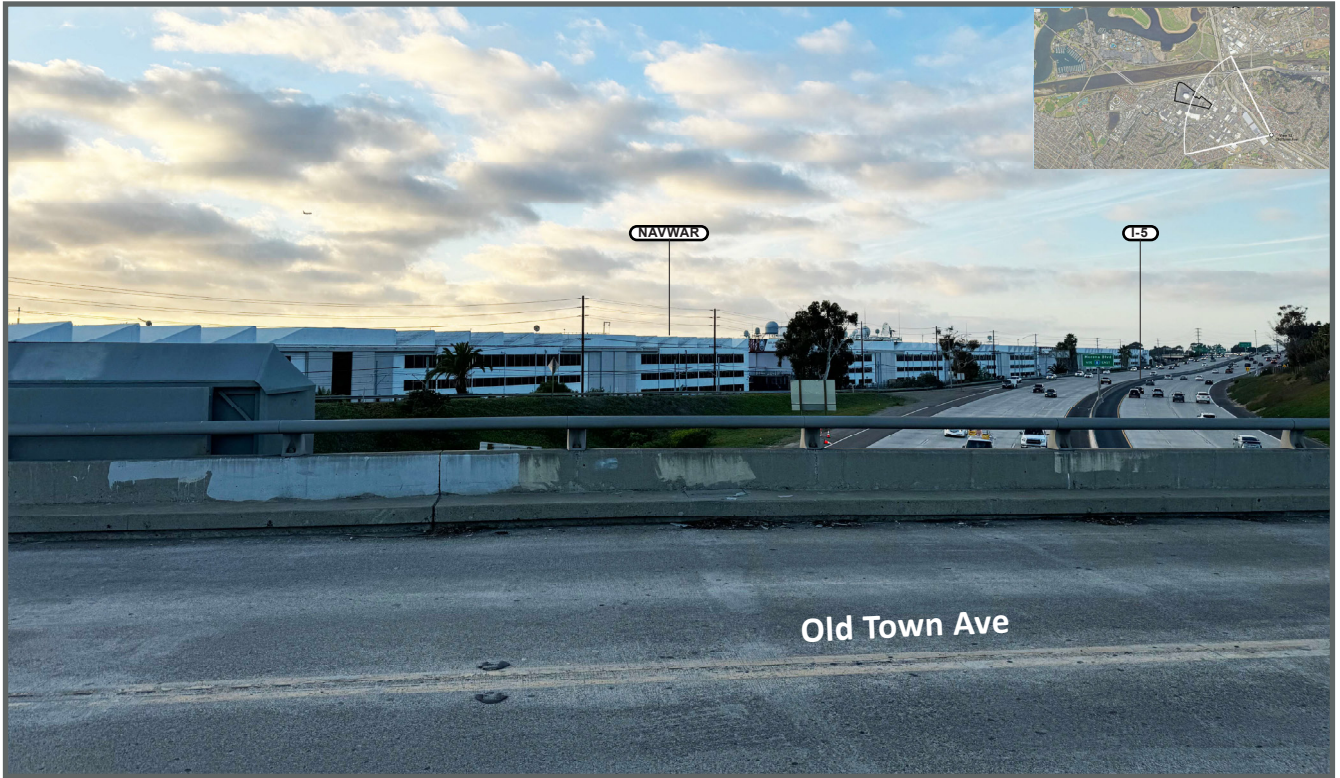
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Figure 14

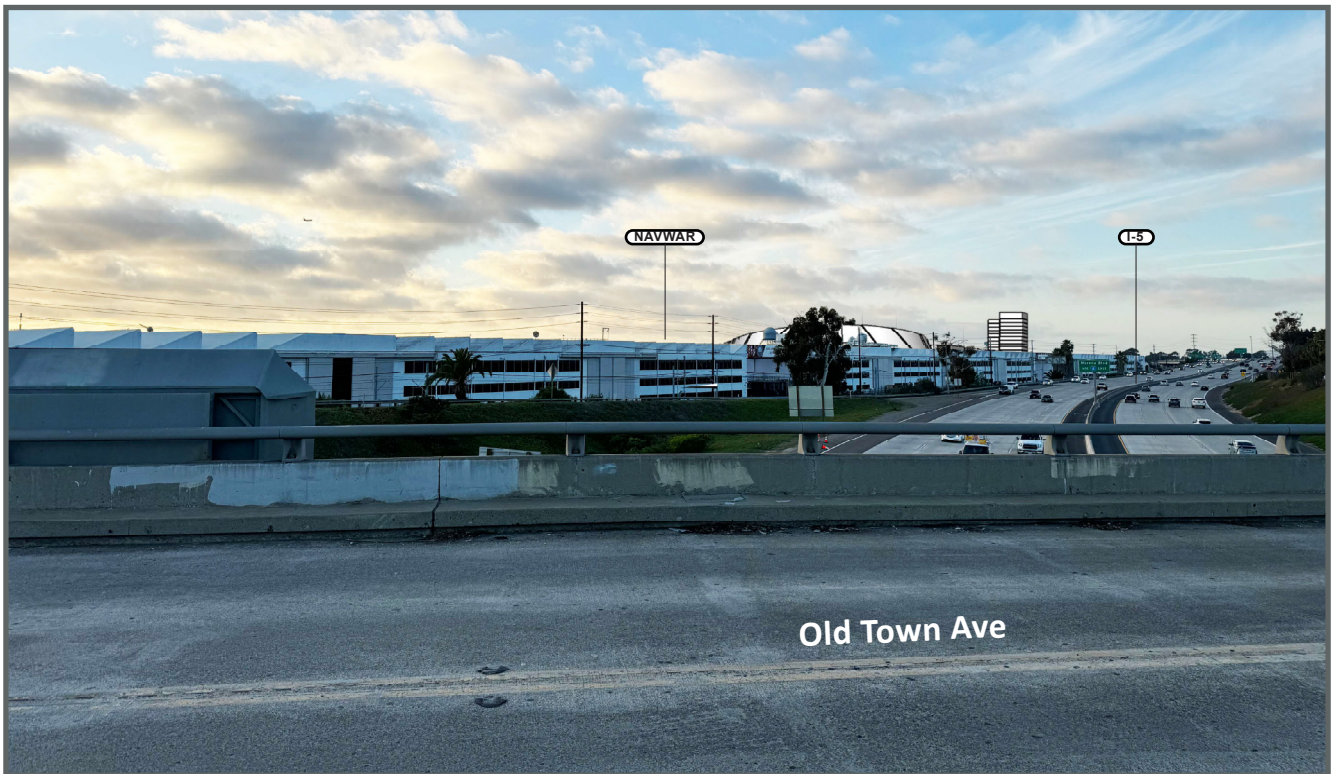
KVP 11 - View Southeast from Kurtz Street/Hancock Street Intersection

Midway Rising

Existing Condition



Proposed Condition



Existing Condition



Proposed Condition



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Source: CityThinkers 2024.

Figure 16

KPV 13 - View North from Rosecrans Street/Lytton Street Intersection

Midway Rising

Existing Condition



Proposed Condition



Source: CityThinkers 2024.

Figure 17

KVP 14 - View Northeast from Kemper Street/Kenyon Street Intersection

Midway Rising

Existing Condition



Proposed Condition

