AGENDA
SAN DIEGUITO RIVER VALLEY REGIONAL OPEN SPACE PARK
CITIZENS ADVISORY COMMITTEE

10:30 a.m. to 12:15 p.m.
Friday, October 5, 2012

Hope United Methodist Church
16550 Bernardo Heights Parkway
(Corner of Bernardo Center Drive and Bernardo Heights Parkway,
on top of hill) Rancho Bernardo

In order to conduct the meetings effectively, the Chair has asked the Citizens Advisory Committee appointees to please sit at the front of the room. Alternates (who are not sitting in for the regular appointee) and others present are invited to sit in the rows behind the committee. Discussion during the meeting will be conducted by the appointees. Alternates and others are welcome to address the committee during the public comment period or if recognized by the Chair during the meeting. Speaker slips are available. It is important that CAC members comply with the Chair's Meeting Procedures and maintain decorum and politeness at all times. A quorum is a simple majority of current members. The Chair cannot start the meeting until a quorum is present. PLEASE ARRIVE BY 10:25 A.M! The CAC may take action on any item listed on the Consent or Discussion/Action agenda, but only when a quorum is present. If a quorum is temporarily lost during the meeting, no further discussion will take place until the quorum is regained. If the quorum is not regained, the meeting will be adjourned. Please advise the Chair at the beginning of the meeting if you must leave before 12:15 p.m.

NOTICE: Agenda packets are distributed by e-mail only. If you do not have an e-mail address, please contact the office at 858 674-2270 to make alternative arrangements.

Roll Call and Introductions
Chair

Late arrivals should speak to staff to make sure their attendance is noted.

Approval of August 3, 2012 Minutes
Chair

Executive Director’s Report
Staff

Public Comment
Public
DISCUSSION/ACTION

1. Committee Reports
   a. Project Review Committee (oral report)
   b. Trails Committee (oral report)

2. Proposed Peter Douglas Memorial – Report from Ad Hoc Committee (Page 3)

3. I-5 North Coast Corridor Supplemental Draft EIR/EIS (Page 12)

INFORMATION

4. Park Project Status
   a. Trail Planning/Status in the Gap Between Santa Fe Valley and Polo Club, (Oral Presentation)
   b. Smart Phone Trail App. Go to sdrpmobile.org on your smart phone, ipad or computer. The App is still in development, this is an opportunity to provide input and suggestions. Using the smart phone or ipad if you have one will give you the best idea of how the App will appear to a trail user.

5. Communications An opportunity for any CAC member or the public to bring to the CAC's attention a project or activity not reviewed by the Project Review Committee in their reports.

Adjournment

Chair

If you have any questions, please call Dick Bobertz at (858) 674-2270.
TO: CAC

FROM: Staff

SUBJECT: Proposal to give Recognition to the late California Coastal Commission Director Peter Douglas at the San Dieguito Lagoon Restoration Site-

Discuss and provide recommendation to JPA Board

At your June 1, 2012 meeting, Diane Coombs, former Executive Director of the San Dieguito River Park, described the leadership role that Peter Douglas, late Executive Director of the California Coastal Commission from 1985 to 2011, had played in directing the Southern California Edison mitigation project to the San Dieguito Lagoon and guiding it to approval and implementation, even when there were forces that would have led to a significant reduction of the project size at San Dieguito. Mr. Douglas passed away in April of this year. Peter Douglas was a fierce defender of the California coast and worked on wetland and public access projects until the end of his life. See attached press release (Attachment 1) that the Coastal Commission issued after his death.

Chair Golich appointed a subcommittee to propose an idea to the CAC as to where and what would be named for Mr. Douglas that would be consistent with the JPA’s “Donation Acceptance and Recognition Policy” (see Attachment 2, Section III). The committee was to be comprised of Diane Coombs, Carol Carr and Trails Committee, Jacqueline Winterer, Bill Michalski and Rand Newman or other representative of the Conservancy. Ms. Coombs was to chair the committee.

The Committee met on August 27th, and discussed various options. They identified three options:

a. The wetlands (W4 and W16 in Area 3 on the 2004 SCE lagoon restoration maps – See Attachment 3) east of San Andres Dr., to be called Douglas Wetland.

b. A native plant garden near the future Open Air Classroom on DS32, to be called Douglas Garden.

c. The wetland between Camino del Mar and the RR tracks west of the fairgrounds, to be called Douglas Wetland.

The Committee’s report was discussed at the September 18th Trails Committee meeting. The Trails Committee also favored Option A. They felt that the San Andres wetlands were the most appropriate for this purpose because they are the result of the excavation associated with the Edison project, and did not exist there prior to the Edison project. Therefore that site is closely identified with his influence and also does not conflict with
the Naming Rights clause that a geographic feature of the Park should not be named after an individual, because it is only one part of the overall San Dieguito Lagoon.

Attachments:

1. Coastal Commission Press Release
2. JPA Donation Acceptance and Recognition Policy
3. Overview Map of Edison Restoration Project
PRESS RELEASE—FOR IMMEDIATE RELEASE

COASTAL COMMISSION MOURNS PASSAGE OF PETER DOUGLAS, FORMER EXECUTIVE DIRECTOR

The staff and Commissioners of the California Coastal Commission grieve the passage of former Executive Director Peter Douglas, who died on Sunday night, April 1, 2012, at his sister's home in La Quinta after a long battle with cancer. Peter was 69 years old.

Peter was the Commission's longest-serving Executive Director, a position he held from 1985 to 2011. Prior to working for the Commission, he served in the Legislature as an aide to Assemblyman Alan Siertoy (D-Beverly Hills), and as a committee consultant. During that time he was responsible for the drafting and passage of Proposition 20 (the Coastal Initiative) in 1972, as well as the California Coastal Act of 1976 which created the Coastal Commission.

Over the decades, Peter's name has become synonymous with coastal protection. His accomplishments are too numerous to list, but he played a part in creating, acquiring or preserving many coastal parks and state beaches, campgrounds, trails and overnight hostels, including Crystal Cove, Garrapata, Tallowa Dunes, Steep Ravine and Sea West State Parks, San Onofre and Doheney Beach State Campgrounds, the Monterey Bay Recreational Trail, the Avila Lighthouse Trail, the Point Buchon Trail and many others. He also worked to protect California’s ocean waters from offshore oil development and other industrial practices. For more information about Peter's career and accomplishments, and to read statements from Coastal Commission staff and Commissioners, please visit the Commission's website, www.coastal.ca.gov.

During his 34-year tenure at the Coastal Commission, Peter earned the love, respect and loyalty of his staff, and inspired environmental advocates and stewards statewide and beyond. He will be forever remembered for his kind heart and unpredictable sense of humor.

Peter is survived by his two sons, Sascha and Vanja Douglas, sister Christina Douglas, brother Dieter Claren, former wife Rotraut, and grandchildren Charlie and Madelina.

In keeping with his last wishes, contributions in lieu of flowers may be sent to:

- Monterey Bay Sanctuary Foundation: A fellowship fund to help train the next generation of coastal defenders has been established in Peter’s honor. Contributions to the Peter Douglas Coastal Intern Fellowship can be made on line at: www.mbnmsf.org
The Wildlands Conservancy: TWC has created the Peter Douglas Coastal Project Fund, to honor Peter’s commitment to protecting coastal landscapes and enhancing public access. These funds will be used toward the purchase of a critical coastal property and/or a public access improvement that will be dedicated in his memory and open and available to all. Contributions to the Wildlands Coastal Project can be sent to:

The Wildlands Conservancy--Coastal Project Fund
39611 Oak Glen Road, #12
Oak Glen, CA 92399
www.wildlandsconservancy.org
Or call: 909-797-8507
PURPOSE

The Board of Directors of the San Dieguito River Park Joint Powers Authority receives support from members of the community and from donors that helps to implement the vision and goals of the San Dieguito River Park, and wishes to recognize those contributions appropriately without detracting from the mission of the San Dieguito River Park. The guidance provided in this policy describes procedures for accepting and recognizing such contributions.

POLICY

It is the policy of the San Dieguito River Park Joint Powers Authority (JPA) that in accordance with the protocols described below, the JPA will encourage and accept the support of donors and members of the community in order to implement the mission of the San Dieguito River Park and will recognize that support through appropriate means. The guiding principle for this policy is dedication to maintaining the open space environment and natural beauty of the land within the Focused Planning Area of the Park.

I. Donations

A. The JPA shall encourage donations from individuals, for-profit, non-profit and public entities, as long as the donations will enhance the Park and are consistent with the Park Concept Plan and mission.

B. Donations may be in the form of land, or interests therein, money or securities, or equipment or other objects.

C. Appropriate items for specified donations shall include, but not be limited to:
   a. Benches
   b. Picnic tables
   c. Drinking fountains
   d. Kiosks
   e. Interpretive signs and markers
   f. Trails or portions thereof
   g. Native gardens or restoration areas
   h. Bridges and Undercrossings
   i. Staging areas
   j. Visitor Center or Nature Center, or portions thereof
D. When donated items are accepted by the Park, these items will be maintained in their designated locations for a reasonable period of time. Donors will be advised, if possible, when the donated item is to be moved or removed.

E. Acceptance of a donation is at the discretion of the Executive Director. A donation may be declined if the donor individual or entity is associated with activities that are incompatible with the goals and objectives of the San Dieguito River Park.

F. The River Park Staff shall be responsible for acceptance, location, usage, maintenance and record-keeping of all donations.

G. When donations are received, the staff will enter the information into an appropriate Donations Record file, which should include:
   a. Name of Donor
   b. Amount of donation
   c. Date of donation
   d. Donor-requested use or purpose of donation
   e. Actual use of donation
   f. Location of donation if appropriate

H. Park staff shall send an acknowledgement letter to each donor to thank them for the donation and provide a receipt for tax purposes.

I. Maintenance
   a. All items donated to the Park shall become the Park’s property and the Park’s responsibility to maintain.
   b. Projects constructed by community or charitable groups may be maintained by the donor group for a time requested by the group if approved by the Park.
   c. The Park will be under no obligation to maintain in place, or replace signs, plaques, structures, or other donated objects if they are vandalized, lost, stolen or otherwise destroyed, or in need of relocation as a result of Park operations. Maintenance or replacement of said objects will be at the discretion of the Park.
   d. When donated items are accepted by the Park, these items will be maintained in their designated locations for a reasonable period of time. Donors will be advised (if possible) when the donated item is to be moved or removed. In the latter instance, the donor will have the first right of acceptance of the removed object.

J. If a member of the public, including the donor, or a member of the CAC, disagrees with the staff’s handling of any aspect of a donation, the disagreement should be made known to the staff in writing, and if the disagreement persists, that party may submit an appeal, in writing, to the JPA. JPA’s decisions on all appeals shall be made in a timely manner, and shall be final.

K. Donations accepted by the Park shall be regularly listed on the CAC agenda so that CAC members or other members of the public are informed regarding the donations that the JPA has received and accepted.
II. Recognition

A. Recognition for certain donated or funded items such as benches, picnic tables, signs and kiosks (items C.a through C.e above) will generally take the form of a commemorative plaque, approximately 4 inches by 6 inches, recording the name of the donor, honoree if any, and the date of the donation, which shall be affixed to the donated item.

B. Recognition for certain donations such as gardens or staging areas (items C.f, C.g or C.i above) may take the form of a small freestanding sign giving the name of the donor, honoree if any, and the date of the donation.

C. For recognition of multiple donations associated with large facilities it will be appropriate to have a plaque or similar display listing all donors, which shall be located in a conspicuous but not distracting location. Size, scale, and material of the sign or other method of display shall be consistent with the number of donors and the structure.

D. The Executive Director of the San Dieguito River Park has the authority to accept the donations described in Section I.C. above, pursuant to the terms of this Policy. The Executive Director shall use his/her judgment regarding whether a donation has the potential to be controversial, and in such case the Executive Director may consult with an ad hoc committee of the Citizens Advisory Committee for advice and recommendation.

E. The donated items described in Section I.C. above will be located in appropriate locations in the Park as determined by the Executive Director or his designee. It is important that the placement of items and/or recognition for donated items minimize impacts to native habitat and the wildlife that uses it, preserve and respect views, and preserve and respect the pristine nature of undeveloped areas.

F. No religious or political statements are allowed on any signage.

G. Recognition for larger gifts may take the form of Naming Rights consistent with Section III.

III. Naming Rights

Naming rights may be granted by the JPA in recognition of any significant contribution to the Park that it wishes to honor. These contributions can be financial in nature or for meritorious service not associated with a donation and is at the discretion of the JPA Board in agreement with the party or their representatives. Naming rights will be granted at the sole discretion of the JPA Board in recognition of persons or entities it wishes to honor.

A. The JPA will not name a geographic feature of the Park, such as a mountain, lagoon or creek, after an individual or other entity.

B. Historical or geographical names for Park facilities are preferred, with the name of the donor or memorial name secondary to the historical or geographical name.
C. Naming Park facilities, including trails, after individuals (donors, honorariums and memorials) should be given careful consideration by the JPA Board and staff.

D. One of the following two criteria must be fulfilled in order for the granting of Naming Rights to be considered:
   a. Recognition of outstanding service to the Park;
   b. Recognition of an exceptionally generous financial contribution from a donor (be it by way of donation, bequest, sponsorship, etc.)

E. Physical Display of Naming Rights
   a. The physical display of the Naming Rights shall be decided or negotiated by the JPA Board on a case by case basis, with consideration given to appropriateness of the size, style and refinement of the display in proportion to the facility and its setting.

F. Duration of Naming Rights. The duration of the recognition – whether in perpetuity or for a designated period – will be determined by the JPA Board in consultation with the donor/contributor or a trustee at the time of the donation/contribution. Notwithstanding this clause, any responsibility of the JPA toward the donor regarding the naming rights is subject to Section I.I.c. and shall be terminated if the named object no longer exists.

G. Informed Consent. The JPA shall not grant a Naming Right without the informed consent of the named party or the named party’s legal representative.

H. Monetary Valuation of Naming Rights. Monetary valuations may be assigned to Naming Rights possibilities on a case by case basis to aid with making decisions about granting Naming Rights.

I. Acceptance of a donation in association with naming rights must be approved by the JPA Board, with recommendation from the CAC. Any member of the public may request that the CAC reconsider its recommendation of acceptance or denial before the item is considered by the JPA Board for a final decision.

IV. This Policy may be amended by majority vote of the JPA Board.

**Adopted by the JPA Board 6/19/09**
**SCE Components**

**JPA Components**

**Legend**
- Blue: Subtidal
- Frequentally Flooded Mud Flats
- Frequently Exposed Mud Flats
- Low Marsh
- Mid Marsh
- High Marsh
- Seaweed Sal Marsh
- Transitional Wetlands
- Rumen
- Nesting Sites
- Disposal Sites
- Excavation Outside Wetlands
- Tidal Pond
- JPA Trail Alignment
- Viewing Platforms

Note: Scaled graphic precludes illustration of narrow portions of transitional wetlands. Details shown on final grading plans.
Agenda Item 3
October 5, 2012

TO: CAC
FROM: Staff and Project Review Committee
SUBJECT: I-5 North Coast Corridor Supplemental Draft EIR/EIS

Discuss and provide input to staff and JPA Board.

SITUATION:

In July 2010, Caltrans released a Draft EIR/S for its plan to widen Interstate 5 from La Jolla to Oceanside. The public’s response to the Draft EIR/S was largely negative and many letters of concern were submitted in response to the document and project design including the JPA’s comment letter (Attachment 1). Primary concerns voiced by the JPA included potential impacts to the San Dieguito Lagoon and Coast to Crest Trail from the freeway widening, lack of specificity in the EIR/S analysis, what appeared to be a lack of consideration for public transit, and the lack of community enhancements proposed for the San Dieguito River Park.

In response to concerns raised by many regarding the lack of specificity on wetland impacts particularly where the freeway crosses six lagoons, Caltrans released a Supplemental Draft EIR/S on August 27, 2012 to provide more design details for the lagoon areas (including San Dieguito Lagoon) and to better address the project’s relation to public transit. Comments on the Draft Supplemental EIR/S are due by October 15, 2012. A final EIR/S will be published in early 2013.

JPA staff and the Project Review Committee compared the new information provided in the SEIR/S to the comments in our 2010 Draft EIR/S letter. In addition, JPA staff met with Caltrans staff regarding the trail and their Public Works Plan.

Locally Preferred Alternative

One major change in the SEIR/S is the selection of a Locally Preferred Alternative (LPA) for the freeway widening called an 8+4 with buffer configuration: a total of 8 “general purpose” lanes (aka, single occupancy vehicle) and 4 HOV (High Occupancy Vehicle) lanes separated by 4-foot wide painted buffers (Attachment 2). Currently, the I-5 freeway through the San Dieguito River Valley consists of five general purpose lanes and one HOV lane in each direction (painted stripes separating), and a north-bound auxiliary lane that exits at Via de la Valle. The new 8+4 configuration in this area means that the lanes would be changed to 4 general purpose lanes and 2 HOV lanes in each direction. The northbound auxiliary lane would remain but would be lengthened to extend from the Del Mar Heights onramp to Via de la Valle. In order to fit the 8+4 lanes while retaining the...
auxiliary lane, the freeway bridge over the river would be widened by 79 feet total (approximately 40 feet on both the west and east sides). See Attachment 3.

Also now proposed along the entire freeway is a dedicated bike path along the west side of the freeway. The bike path in the San Dieguito stretch would be placed on the existing west-side freeway embankment and suspended on a hanging platform on the freeway bridge over the river (Attachments 4 and 5).

The existing embankments on the west and east sides of the freeway would be modified to accommodate the widened freeway/bridge and bike path, and a retaining wall would be added to the east side of the freeway south of the river.

According to the SEIR/S, the existing Coast to Crest Trail would not be impacted by the freeway widening.

ISSUES:

The SEIR/S better addresses some of the JPA’s concerns, but leaves other issues not adequately addressed. Although the Draft EIR/S only addresses the freeway widening, the Caltrans project is part of a larger transportation plan called the North Coast Corridor System Management Plan that includes vehicular, rail, and pedestrian and bicycle routes. One change in the I-5 SEIR/S is incorporation of SANDAG’s updated 2050 Regional Transportation Plan (RTP) which considers freeway widening as well as implementation of double tracking the LOSSAN rail corridor although the rail project is not funded and its timeline remains uncertain.

Regarding public transit, the new document does a better job of identifying how the project fits into the regional plan for public transit. The document updates the project in response to California Senate Bill 468 (sponsored by Senator Kehoe, 2011) that requires a balanced multimodal approach to transit such as not to compromise or diminish existing natural resources and also requires a Public Works Plan to provide an integrated process with California Coastal Commission approval such that PWP elements are identified as part of the transit projects including coastal access, transit, multimodal, environmental restoration, and mitigation. SB 468 also requires that construction of all or a portion of the I-5 project be done concurrently with the multimodal projects as well as the environmental mitigation and enhancement projects identified in the SEIR/S.

Public Works Plan

The Public Works Plan (PWP) includes a number of “community enhancements” along the entire freeway corridor. These enhancements include bike and pedestrian paths, improved east/west bike and pedestrian connections, landscaping, utility undergrounding, a Batiquitos Lagoon nature center, and other amenities. However, the project did not propose any enhancement projects within the San Dieguito River Park even though several “opportunities” were identified during their planning process.
The PWP was included in the 2010 I-5 project, but according to Caltrans it has been revised and a new draft is due to be released for public review “this fall”. JPA staff has been told that the PWP now includes a portion of the Coast to Crest Reach the Beach Trail alignment. JPA met with Caltrans staff about the PWP and provided them with design and cost details for a part of the Reach the Beach Trail alignment that falls within the LOSSAN corridor. This includes the bridge over Stevens Creek, the bridge tunnel through the railroad berm, and a section of trail along the railroad embankment. However, the PWP has not been released for public review and it is unclear when the trail would be built and how it would be funded.

Summary of Concerns

Based on our 2010 comments and review of the SEIR/S, we have identified the following remaining or new comments/concerns:

- Even with more detailed maps in the Draft SEIR/S, it remains unclear how the project would avoid physically impacting the Coast to Crest Trail that travels under the freeway and parallel with the east side of the freeway, and crosses two drainage channels on both sides of the freeway. Based on information in the SEIR/S, the proposed bike path and widened freeway bridge would entail replacing at least one of the channels with an underground pipe to convey the runoff but it makes no mention of how the trail or trail bridges would be avoided.

- Even if the trail is avoided, the project would negatively impact the quality of public open space and recreational experience in the San Dieguito River Valley. Impacts such as increased noise, litter, fire exposure, and visual intrusion are not identified or mitigated.

- There remains a lack of mitigation or community enhancements to address potential impacts on open space quality and trail experience including an increase in noise level (2 dBA) and increased visual intrusion.

- No details are provided to show a connection of the proposed North Coast bike path to the existing Coast to Crest Trail. Both are regional facilities and should be connected but the SEIR/S only refers to a “possible connection” with no information to show how that would be done.

- While the San Dieguito Lagoon will benefit from the W19 mitigation project proposed to mitigate biological and wetland impacts from the freeway project and Caltrans/SANDAG is following a regional approach to mitigating those impacts, no mitigation is proposed in the form of community enhancements in the San Dieguito River Park to offset recreational impacts from the increased freeway footprint/intrusion.
• The PWP should be available for public review well before the comment period deadline for the Draft SEIR/S so that we could assess whether the projects, timeline, and funding would adequately mitigate the impacts.

• Noise attenuating surface materials, such as rubberized asphalt, should be used along the freeway where it crosses lagoons. It is our understanding that other stretches of freeway and roads in San Diego that have this material show significant and measureable reductions in tire noise.

Because the comment deadline for the SEIR/S is October 15, which is two days prior to the next JPA Board meeting, JPA staff will submit a comment letter by the deadline and then report on this item at the JPA meeting on October 17 with a recommendation that the JPA Board send a follow-up letter confirming the comments.

Respectfully submitted,

Shawna Anderson
Principal Environmental Planner

Attachments:

1. JPA comment letter dated 11/19/10 on I-5 Draft EIR/S
2. I-5 widening 8+4 schematic (Figure 2-2.8 LPA Cross Section)
3. Project schematic at San Dieguito Lagoon (Figure 2-2.7b)
4. North Coast Bikeway route (Figure 2-2.4c)
5. Bikeway suspended over lagoon/river crossings (Figure 2-2.3)
November 19, 2010

Shay Lynn M. Harrison
Branch Chief
Environmental Planning Branch C
Caltrans District 11 (MS 242)
4050 Taylor Street
San Diego, CA 92110

Subject: Comments on Interstate 5 North Coast Corridor Draft EIR/EIS

The San Dieguito River Park Joint Powers Authority (JPA) Board considered the Draft EIR/S for the I-5 North Coast Corridor at their meetings of September 17 and November 19, 2010. Interstate 5 travels across the newly restored San Dieguito Lagoon and through the western portion of the San Dieguito River Park, a 55-mile long regional river valley open space corridor. It bisects the San Dieguito Lagoon as it does through the other San Diego County coastal lagoons, representing a major impediment to east/west tidal flow and connectivity.

The JPA, with representation from each land use jurisdiction within the San Dieguito River Park’s focused planning area; is empowered to plan and maintain the San Dieguito River Park. The adopted San Dieguito River Park objectives include not only the preservation of open space, but to preserve the natural character, visual quality and sensitive resources of the open space corridor, including protection of water resources, and creation of recreational opportunities throughout the Park (San Dieguito River Park Concept Plan, 1994). The San Dieguito Lagoon represents the western gateway to the San Dieguito River Park. While the JPA recognizes the importance of I-5 as a coastal transportation route and the need to keep goods and services flowing efficiently, we also place great value in the role our coastal lagoons play in the region. We support a fair balance between these two vital resources. The project to widen I-5 through this area must not occur at the expense of the San Dieguito River Park and the associated coastal lagoon.

The JPA’s comments specific to the Draft EIR/S are substantial and warrant a recirculation of the DEIR/S with our questions and comments addressed:

1. The Draft EIR/S does not adequately address the need for the project as required by NEPA, in particular the need relative to or in combination with the proposed LOSSAN rail corridor. In Section 1.3 (Need for the Project), a statement is made “even with the proposed improvements (to the rail corridor), capacity would not be sufficient to address anticipated travel demand along the I-5 corridor in 2030”, yet no further explanation or analysis is provided to justify why widening of the I-5 to 14 lanes is needed if public transit along the LOSSAN corridor is expanded (ie, double tracking). Caltrans’ NEPA guidance regulations require explanation of and justification for the purpose and need of a project in an EIS. The Draft EIR/S should
provide a quantified comparison of vehicular and rail trips within the I-5 corridor and how implementation of both the I-5 widening project and double tracking affects those trips. In addition, Table 1.3-11 states that the LOSSAN double tracking (to expand public transit) is a “vision” yet it is included in SANDAG’s 2030 RTP. It is not clear in the Draft EIR/S that expanding public transit would still require a need for the project to the extent proposed. Without this knowledge, it cannot be determined if impacts to the San Dieguito Lagoon wetlands and Park are justified or if other less impactive alternatives are feasible.

2. How does the project fit with the I-5 NCC Corridor System Management Plan (CSMP) with respect to a multi-modal approach to the corridor? Again, the Draft EIR/S does not adequately convey how the different modes of transit work together to meet demand and how public transit would reduce vehicular travel. If Caltrans continues to widen freeways to improve level of service and decrease vehicular travel times then there is no incentive for the public to use public transit. Impacts associated with widening the freeway are numerous and significant and are not adequately justified.

3. Main arterials adjacent to I-5 within the Del Mar/San Diego region, such as Via de la Valle and El Camino Real, are also proposed to be widened. Widening the adjacent roadways will also have significant effects on the San Dieguito River Valley. It is unclear in the Draft EIR/S how the I-5 project may affect vehicular flow and level of service on the area roadways. The Draft EIR/S must adequately address the cumulative impacts of all proposed vehicular roadway/freeway widening in this sensitive coastal area.

4. The EIR/S does not adequately describe the amount of additional freeway right-of-way (R/W) needed for the widening. Figure 10 (page A-25) shows new R/W over the Coast to Crest Trail (east side of freeway), but states that the project would not “interfere with existing trails or planned trails” (page 3.1-44) and “would not result in permanent impacts to any of the trails…” (page A-28). There appears to be a direct conflict in the analysis, which shows new R/W proposed right over the existing Coast to Crest Trail yet a statement that no impacts would occur to the trail. Page 3.1-25 refers to “minor acquisitions” in the San Dieguito River Park but provides no detail on what is proposed within the new R/W. What are the “minor acquisitions” proposed in the San Dieguito River Park?

5. We disagree with the unsubstantiated blanket statement on page A-28 that the project “would not affect the visual quality of the SDRP because they would simply extend the Caltrans’ right-of-way boundary outward slightly and ultimately result in a view of the area adjacent to I-5 very similar to the existing condition.” Figures 2-2.10 and 2-2.11 show an expansion of 48-60 feet into the park and directly over the Coast to Crest Trail. The DEIR/S must provide specifics, as required by CEQA Section 15126.2, to substantiate the conclusion of no impact.

6. The first paragraph on page A-29 addressing the Coast to Crest Trail completely dismisses any impacts to the trail and San Dieguito River Park as de minimis. We strongly disagree with that assessment, which is based on vague unsubstantiated statements that appear to ignore the addition of 120 feet of freeway lanes, tall retaining walls, higher traffic volumes, increased shadowing in the river channel from a wider
bridge, loss of habitat, and new R/W over the Coast to Crest Trail. Incremental additions to the freeway width and vehicular use over the past twenty years has contributed substantially to adverse effects on the River Valley from the freeway, which would be made worse by the proposed project. These impacts must be addressed in greater detail and mitigated by the project.

7. The buffer design would reduce the footprint needed for the expansion through the sensitive coastal areas by 26 feet. Minimizing the project footprint should be one of the project objectives.

8. The project description is not clear on what exactly is proposed northbound at Via de la Valle. The configuration for the Via de la Valle northbound section appears to be a 12+4 configuration (not 8+4 or 10+4 as described in the DEIR) since the auxiliary lane apparently would remain. The DEIR/S does not accurately describe the project details. Please clarify what is proposed for the existing auxiliary lane northbound at Via de la Valle, which adds another lane to the existing 5 lanes northbound.

9. The text in the 2nd paragraph on page A-27 that discusses the existing trails within the lagoon area should be updated. For example, the Coast to Crest Trail lagoon segment is not proposed, but is now complete from Horsepark to Jimmy Durante and includes a freeway undercrossing. Inaccurate information misleads the decision makers and does not allow for an accurate assessment of impacts.

10. The last sentence of this same paragraph conflicts with the statement on Figure 10 “not subject to 4(f) (private)” shown for the area that contains the existing recreational trail and on land that is clearly part of the San Dieguito River Park. Clearly, public open space and recreational trails are subject to 4(f) analysis. In addition, the aerial background should be updated to show the current condition of newly created wetlands in order to accurately analyze impacts to the wetlands. Inaccurate information misleads the decision makers and does not allow for an accurate assessment of impacts.

11. The Coast to Crest Trail lagoon segment is not clearly described or shown accurately in the Draft EIR/S. Figure 9 describes it as “proposed hiking trail”. The trail already exists and is not a “hiking trail” but a regional public multi-use trail (pedestrians, bicycles, and horses) and the western extent of the CTC Trail.

12. During the widening of I-15 Managed Lanes in the Lake Hodges area the Coast to Crest Trail undercrossing was impacted by the lengthy freeway widening construction period and was not rebuilt in a satisfactory condition. Litter and drainage impacts occurred throughout the multi-year construction period and adequate notice was not provided to JPA staff and trail users during periods of trail closures. Trail facilities such as bollards, fences, benches, and signs were also damaged or removed by Caltrans’ contractors and, in some cases, were not repaired or replaced. Better communication and coordination with JPA staff must occur during project implementation. Please add the JPA to the agencies with which Caltrans will be coordinating and clearly describe in detail what communication and coordination you plan to undertake with the JPA.
13. Aerial backgrounds used for base maps are outdated and do not show the dramatic changes in the lagoon area from the restoration/creation of over 150 acres of wetlands, a new tidal basin just west of I-5, new tidal wetlands on both sides of freeway, and the new Coast to Crest Trail lagoon segment. Views of this area from the freeway and surrounding area have been greatly enhanced and the coastal wetland and upland habitat has been expanded and greatly improved. Inaccurate information misleads the decision makers and does not allow for an accurate assessment of impacts.

14. Of great concern to the JPA is the lack of community enhancements proposed for this portion of the North Coast Corridor that includes the western gateway to the regional 55-mile long San Dieguito River Park. The I-5 corridor provides vehicular access and public views to the park but at the same time represents the major urban intrusion into the valley as it does for the other coastal lagoons in San Diego County. Proposed I-5 widening will negatively impact this area by greatly expanding the freeway expanse through the lagoon and park by as much as 146 feet (Figure 2-2.10). Several opportunities for community enhancements were documented in Caltrans’ Community Enhancement Plan (Jan 2008) including an extended trail along San Dieguito Drive and a nature center east of I-5 visible from the freeway, but are not proposed as part of the I-5 NCC project. A lack of public parking also exists in this area to provide adequate public access to recreational facilities that were recently expanded. In addition, the Coast to Crest Trail is incomplete west of Jimmy Durante. The JPA has obtained over $7.1 million in grants and donations to acquire open space and build public park facilities in this area (in addition to SCE’s $86M wetlands mitigation project) that could be further expanded and enhanced. The I-5 NCC does not contribute to any enhancements in the San Dieguito River Park area, a substantial deficiency in the project.

15. The JPA opposes traditional sound walls along the I-5 lagoon corridor because they would block scenic views to the lagoon, valley floor, and ocean beyond. Coastal estuarine views define the character of the coastal drive through north San Diego County. These views would be destroyed by sound walls that also would form a tunnel along the freeway. We agree with the impact assessment in the Draft EIR/S of sound wall 573 described on page 3.15-9 and oppose any traditional noise barriers (e.g., S603).

16. Because of the negative visual impact that sound walls would create through the lagoon area, the Draft EIR/S should address other design solutions to attenuate freeway noise along the Coast to Crest Trail as feasible mitigation measures required by CEQA/NEPA. Since tire/road noise accounts for 75-90% of overall roadway noise (I-5 NCC Traffic Noise Basics), then alternative freeway surface materials that reduce vehicular wheel sound should be examined as a mitigation measure. Also since wind is an important meteorological factor that effects noise levels and off shore wind is prevalent adjacent to I-5 in the San Dieguito River Valley, shorter noise walls that may reduce noise at sensitive receptors below the freeway elevation could also be examined as a mitigation measure (the trail is located at least fifteen feet below the freeway elevation). The DEIR/S should address other design solutions to attenuate freeway noise.

17. The information in the Draft EIR/S about retaining walls proposed for both sides of the freeway is inadequate to accurately determine impacts to habitat and scenic views. The
EIR/S should describe exposed height, design, length, and proposed landscaping, etc. for these walls. Native landscaped buffers should be incorporated into any wall design within the San Dieguito River Valley specifically adjacent to the existing preserved open space.

18. Recent landscaping done by Caltrans has included planting acres of ice plant along widened freeway corridors. Some varieties of ice plant, as well as other invasive non-native species, spread to adjacent native habitat causing significant impacts to native plants and the wildlife that depend on them and, therefore, should be strictly forbidden within the I-5 NCC. All landscaping within and adjacent to wetlands and adjacent uplands should be required to be native species.

19. The information in the Draft EIR/S about widening San Dieguito Bridge over the river lacks the specificity needed to accurately determine impacts to habitat, hydrology, tidal flushing, and to the existing trail undercrossing. We are opposed to adding any new piers in the already impacted river. Page 3.9-5 under San Dieguito River states that the bridge would be widened by 39 feet on each side. How is this widening to be accomplished without impacting the existing trail, habitat, or drainage channels?

20. Widening the San Dieguito River bridge without lengthening its span would cause unmitigated impacts because the only connection between the west and east sides of the coastal estuary/river being under the freeway would be further constrained. As stated on page 3.17-5 of the Draft EIR/S, the freeway represents a barrier to east/west wildlife movement across the lagoon. An opportunity exists to provide habitat connection between the west and east sides, but instead the project proposal is to further constrain the only link by widening the concrete bridge. The conclusions reached in the Draft EIR/S about wildlife movement are unsubstantiated calling the trail under the freeway a wildlife trail. The concrete trail under the San Dieguito River bridge does not function as a wildlife corridor. No connecting habitat exists on the north side of the bridge and the south side is also constrained with little habitat connectivity. Widening the bridge without providing a better wildlife corridor connection will further constrain wildlife movement in this corridor and is not mitigated by the project.

21. How are the two existing drainage channels paralleling I-5 impacted by the project? Coast to Crest Trail bridges exist over both drainages that drain into the river. The Draft EIR/S does not describe these or identify impacts.

22. Why doesn't the EIR/S address a potential DAR to the Fairgrounds? The Draft EIR/S (page 1-9) states “A DAR at Via de la Valle may be analyzed in conjunction with the anticipated traffic impacts from the Del Mar Fairgrounds project.” This statement is outdated since the Fairgrounds Master Plan Draft EIR circulated at the end of 2009 did not include a DAR. Not providing this information is potentially piecemealing the project.

23. The biological analysis must be updated to reflect the current condition of the lagoon since SCE created 150 acres of new tidal wetlands including a new tidal basin on the west side of the freeway and several acres of new marsh habitat on both sides of the freeway. The restoration has substantially increased the number and species of fish and birds at the
lagoon as well as the quality of habitat. The biological surveys were conducted prior to the restoration (lagoon technical study is dated June 2006, which is during construction of the restoration project) and do not reflect the existing condition. In fact, if the surveys were conducted during lagoon restoration construction then the results may be even further underestimated. Indirect impacts to species are of particular concern from increases in noise (temporary during construction and permanent after project completion), urban intrusion, particulate matter, edge effects, litter, and visual. Inaccurate information misleads the decision makers and does not allow for an accurate assessment of impacts.

24. The floodplain and hydrologic analyses are based on conditions that existed prior to the San Dieguito Lagoon restoration and must be updated to accurately assess the impacts of the project since areas were dredged and new wetlands created.

The JPA appreciates the opportunity to comment on the Draft EIR/S. Pursuant to CCR 15088.5, we strongly recommend that Caltrans recirculate the DEIR/S prior to its certification as it is presently inadequate in its evaluation of significant effects and mitigation regarding the San Dieguito River Park. The JPA would be pleased to work with Caltrans to identify design solutions to mitigate some of the impacts to the Park. Please keep us informed as the environmental process continues and feel free to contact our Environmental Planner, Shawna Anderson at shawna@sdrp.org if you have any questions about our comments.

Sincerely,

JPA BOARD OF DIRECTORS

Richard Earnest, Del Mar City Council
JPA Board Chair
Figure 2-2.8: LPA Cross Section

EXISTING INTERSTATE 5

NO BUILD ALTERNATIVE

EXISTING INTERSTATE 5

8+4 WITH BUFFER ALTERNATIVE
Figure 2-2.7b: I-5 NCC Project Configuration

Schematic View, not to scale

Proposed Auxiliary Lanes
Existing Auxiliary Lanes
HOV/Managed Lanes
Direct Access Ramps
Intermediate Access Points
(At Grade Entry/Exit HOV Lanes)
Undercrossing
Overcrossing
Streets not directly impacted
Jurisdictional Boundaries
Structures over Waterways

LEGEND

UC Undercrossing
OC Overcrossing

Figure 2-2.7b: I-5 NCC Project Configuration

I-5 NCC Project Supplemental Draft EIR/EIS
page 2-64

ATTACHMENT 3
Figure 2-2.4c: North Coast Bikeway Elements
Figure 2-2.3: Suspended Bike/Pedestrian Path Typical Configurations

Only configuration available at San Elijo Lagoon crossing due to clearance and wildlife corridor issues.