



San Dieguito River Park
Joint Powers Authority
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July 19, 2024

Tim Pesce
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Subject: Response to SDLRR Project NOP

Dear Mr. Pesce:

Thank you for notifying the San Dieguito River Park Joint Powers Authority (JPA) regarding the preparation of a Draft EIR for this project. The JPA staff has followed the progression of this proposed project over the last several years. The proposed project's alignment alternatives all overlap with the San Dieguito River Park's Focused Planning Area (FPA) and have the potential to impact resources within the JPA's jurisdiction.

As stated in the San Dieguito River Park's Concept Plan (SDRP Concept Plan), the goals and objectives include: *the preservation of open space, conservation of sensitive resources, protection of water resources, preservation of the natural floodplain, retention of agricultural uses, creation of recreational and educational opportunities*. The alignment alternatives being considered for the rail relocation project overlap with Landscape Unit A – Del Mar Coastal Lagoon, one of fourteen landscape units, and would potentially impact the natural and recreational resources within the SDRP including the Coast to Crest Trail (CTC Trail).

The San Dieguito Lagoon sits within the Del Mar Coastal Lagoon landscape unit that represents the western gateway to the San Dieguito River Valley. This landscape unit is characterized by its broad floodplain, scenic coastal views, and rare wetland ecosystem. Over \$150 million of public funds have been invested in the protection and restoration of the San Dieguito Lagoon as a regional environmental resource that also serves as a protective measure against catastrophic flooding and sea level rise. Recent efforts to restore the ecological function and vitality of the San Dieguito Lagoon include restoring over 150 acres of tidal wetland habitat in 2012 and restoring another 80 acres of salt marsh and other habitats as part of the Phase II wetland restoration project completed in June 2024.

We believe it is appropriate that the SDLRR Draft EIR address the following issue areas regarding the San Dieguito River Park:

- Land use
- Recreation and public facilities
- Aesthetics and viewsheds
- Wildlife corridor continuity

- Impacts to the San Dieguito Lagoon and associated wetlands including *protection against future sea level rise; impacts to sensitive species, wildlife and habitat areas; and protection of surface water quality, groundwater, and hydrologic resources*
- Noise
- Portal and right-of-way landscaping
- Trail compatibility and continuity

Please see below for further explanation of issues and suggested analysis regarding the proposed project:

Issues and Analysis

Project description:

The project description within the DEIR should include detailed project information and illustrations for each alignment alternative design, including specific locations and design details of all project components (e.g., tunnel portals and floodwalls) at a scale that enables a clear understanding of their location and design, construction details and methods, project timeline, costs, project operation, and maintenance requirements, etc. The description should also include a comparison of the preferred project with the other alternative alignments.

Land use:

The project area includes the San Dieguito Lagoon and other resources within Landscape Unit A (Del Mar Coastal Lagoon) of the San Dieguito River Park as addressed in the SDRP Concept Plan. We ask that SANDAG evaluate the proposed project's consistency with the SDRP Concept Plan and other relevant public agency programs and plans.

Recreation and public facilities:

Multiple recreational areas and public facilities overlap with the scope of the alignment alternatives described in the NOP. These include the CTC Trail, boardwalk trail, Grand Avenue Overlook, Crest Canyon, and the publicly owned open space associated with the San Dieguito Lagoon and valley, as well as SANDAG's planned Interstate-5 bikeway and connection to the CTC Trail. Additionally, alignment Alternative A may affect the proposed and funded Del Mar Fairgrounds Special Events Platform.

The DEIR should include details about each of the alignment alternatives regarding effects to recreational uses and areas. The DEIR should address how existing and proposed public facilities would be affected by each of the alignment alternatives, including if certain facilities would no longer be usable or feasible or would require modification or removal. Additionally, the DEIR should include detailed mitigation measures for project impacts to recreational areas and public facilities.

Aesthetics and viewsheds:

The alignment alternatives and associated project components like floodwalls and U-section tunnels have the potential to affect the viewshed of the San Dieguito lagoon area and public views along the trail system.

The DEIR should analyze these issues and explain the consistency of the proposed project with Part II of Appendix D of the SDRP Concept Plan and land use plans for the area, including

height limits and aesthetics. Scaled diagrams and visualizations should be included to clearly illustrate the visibility of project components and how they would affect public views to Stevens Creek, the San Dieguito Lagoon and inlet, and Crest Canyon and how these aesthetic resources would be altered by the project. Additionally, the DEIR should include mitigation measures for design features and details of any project components that may partially or fully mitigate any significant impacts, as appropriate.

Wildlife corridor continuity:

The San Dieguito Lagoon and surrounding canyons and tributaries are part of a critical wildlife corridor, and the alignment alternatives may affect the continuity and function of the wildlife corridor.

The DEIR should analyze the potential impacts of each alignment alternative on the wildlife corridor including wildlife movement and direct and indirect impacts such as noise and vibration that would reduce the quality and function of the corridor. Impacts should be identified and explained for each phase of the project including construction, operation and maintenance. Proposed mitigation measures to address significant impacts must include sufficient detail to assess their effectiveness on the long-term function of the existing wildlife corridor.

Impacts to the San Dieguito Lagoon and associated wetlands:

The San Dieguito Lagoon, a regional resource that contains sensitive species, fish nurseries, and vital habitat areas, overlaps with all alignment alternatives, and may be affected by the project. The San Dieguito Lagoon, San Dieguito River, Stevens Creek, and the San Dieguito Creek Groundwater Basin and associated surface water quality and groundwater/hydrologic resources may be affected by the project's design components.

The DEIR should analyze how the project would affect and be affected by sea level rise within the Lagoon and wetland areas, evaluate the project's impacts to sensitive species, fish nurseries, and wildlife habitat, and how the project would protect surface water quality and groundwater/hydrologic resources. Additionally, the DEIR should address how the project tunnel excavations may affect the hydrogeomorphology of groundwater basins and tidal zones. The DEIR should also include details for mitigation measures to address significant impacts.

Noise and Vibration:

Alignment alternatives B and C include a proposed northern tunnel portal near the San Dieguito Lagoon inlet. In addition, alignment Alternative A includes cut and cover tunnelling near the inlet. Noise, vibration, and visual blight from rail construction and operations related to rail cars entering and exiting the tunnels may affect sensitive wildlife and CTC trail user experience.

The DEIR should analyze how the project may affect ambient noise levels, vibration magnitude, and other sensory experiences within the northern tunnel entrance areas. Additionally, the DEIR should include mitigation measures for noise and vibration and details of any project features that may partially or fully mitigate any significant impacts, as appropriate.

Portal and right-of-way landscaping:

The proposed project will likely require changes to existing landscaping and vegetation communities within the right-of-way and tunnel portals for each alignment alternative. Proposed landscaping should conform to the SDRP Concept Plan including the usage of native species to match existing vegetation communities.

The DEIR should analyze how the project's landscaping and design would affect existing and surrounding vegetation communities and habitat value. Additionally, the DEIR should include mitigation measures for vegetation impacts and details of any project features that may partially or fully mitigate any significant impacts, as appropriate.

Trail compatibility and continuity:

The CTC Trail and River Path Del Mar overlap with all alignment alternatives. Additionally, SANDAG's North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Plan (PWP) includes a package of highway, rail, transit, bike/ pedestrian, environmental and coastal access improvements located along the North San Diego County coastline and describes an array of public access improvements throughout the corridor, including a CTC Trail crossing at the San Dieguito railroad track on the north side of the river. The crossing is required to be phased with replacement and double tracking of the San Dieguito LOSSAN project. The crossing location shown in the PWP on the north side of the river (i.e., adjacent to the Fairgrounds) and identified as Community Enhancement DM#1 in the PWP is consistent with the JPA's CTC Trail "Reach the Beach" Feasibility Study.

The DEIR should analyze how the project would impact existing public trail resources within the project area including trail usage and experience and connectivity. The analysis should describe temporary impacts during construction activities and permanent impacts to trail routes or useability. For example, analyze how each alignment alternative may affect trail user experience as well as how each would affect existing infrastructure/trail alignments and the improvements proposed in SANDAG's PWP. The DEIR should include details of any proposed mitigation measures that would address any significant impacts, as appropriate.

Regarding the aforementioned issues, this project could potentially be devastating to the San Dieguito River Park including the lagoon and watershed. The Draft EIR must be of sufficient detail to fully understand the project's potential impacts and whether they can be mitigated or would cause irreversible harm and enable SANDAG to make an informed decision on the least environmentally damaging project alignment.

Thank you for considering our comments and keeping the JPA informed on this project, and we look forward to receiving the Draft EIR.

Sincerely,

Shawna Anderson, AICP
Executive Director

Reference:

San Dieguito Concept Plan (adopted 1994, revised 2002). Available at:
<https://www.sdrp.org/docs/>