



Friends of Rose Canyon

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Sent via email: midcoast@sandag.org

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Subject: Comment letter on the Mid-Coast Corridor Transit Project Draft SEIS/SEIR

Friends of Rose Canyon welcomes the opportunity to comment on the DSEIS/SEIR. We greatly appreciate SANDAG's decision to choose the current alignment for the project rather than the alternative that would have gone through Rose Canyon to Genesee Avenue.

Nevertheless, there will be major negative impacts from this project on Rose Canyon Open Space Park, Marian Bear Park, the MHPA and the Rose Creek watershed. Unfortunately, the DSEIS/SEIR fails to analyze the noise, visual and other impacts on Rose Canyon Open Space Park Preserve (the park's official name), Marian Bear Memorial Park and the MHPA. The SEIS/SEIR needs to adequately analyze all impacts and avoid, reduce, abate or mitigate them.

The City of San Diego's Rose Canyon Open Space Park and Marian Bear Memorial Park are areas of major importance for recreation and environmental education for residents from across the city. People come to these parks to run, hike, walk their dogs, mountain bike, birdwatch, learn about native plants and animals, volunteer on habitat restoration projects, and to escape from urban surroundings to simply enjoy nature. In the last few years, the recognition has grown locally and nationwide how disconnected children have become from nature. San Diego, like much of the country, is increasingly urbanized, and kids and adults spend long hours every day engaged with technology. Moreover, far fewer natural areas remain in San Diego than just a few decades ago. Children no longer connect with and explore nature as part of their free play. Thus the movement has sprung up in San Diego and across the nation to connect children to nature. School groups, scout groups and families now look to the city's open space parks as places where they can bring children to experience, learn about and enjoy nature. These parks are all that remain of the natural landscapes and wildlife that were common in San Diego until just a few decades ago. We must act to protect these last natural areas. SANDAG must act to protect these areas. Smart growth isn't very smart if we destroy the remaining natural areas that provide urban residents an escape from all the concrete. The MHPA isn't worth anything if we continue to degrade it, bit by bit.

Our open space parks are not only invaluable for people. They are also preserves for wildlife. Rose Canyon and Marian Bear Park were given an added level of protection for this purpose

when the City added them to the MHPA.

It is always going to be easier to further degrade these urban natural areas than to protect them. We face a big test here: is it possible to build a major project like the Mid-Coast Corridor Transit Project, whose stated goal is to promote smart growth and benefit the environment, and commit the time, effort, creativity and money to do it in a way that truly protects our priceless remaining natural lands?

Based on the many inadequacies in the DSEIS/SEIR, there is a lot more work to do to achieve that goal.

I. Value and Purpose of Rose Canyon Open Space Park

As stated on the City's website, the Mission of the City's Park and Recreation Department is: "To acquire, develop, operate, and maintain a park and recreation system which enriches the quality of life for residents and visitors alike, and preserves it for future generations."

Further, the City of San Diego website states:

"Open Space within the City of San Diego is defined as areas generally free from development or developed with low intensity uses that respect natural environmental characteristics. Open Space Parks are used for purposes such as preservation of natural resources, passive outdoor recreation and scenic and visual enjoyment."

As stated in the City of San Diego's 2012 Bike Master Plan Update Draft Program EIR: P. 5.4-1: Approximately 30 percent of all existing land use in San Diego consists of parks, open space, and recreation areas reserved for environmental protection and/or public recreation. Preserving parks and open space areas protects San Diego's unique natural landscape and scenic beauty. Natural scenic vistas can be seen from the 36,000 acres of recreational and open space parks in the City, such as Mission Trails Regional Park, Marian Bear Memorial Park, Rose Canyon Open Space Park, Tecolote Canyon Natural Park & Nature Center, San Diego River Park, Los Peñasquitos Canyon Preserve, Black Mountain Open Space Park, and San Pasqual/Clevenger Canyon Open Space Park (City 2008b).

II. Visual Impacts

The DSEIR/SEIS in places seems to recognize the importance of Rose Canyon Open Space Park:

Section 4.2.1.4 Canyons

"The canyons along the project alignment, Tecolote, Rose and San Clemente Canyons, set the character of several landscape units (Figure 4-8). The natural landscape within these canyons contrasts visually from the developed areas along the top of the adjacent canyon edges. These areas can be seen from a great distance and are perceived as major open spaces. They also can be seen from various trails running through the area. At this scale, the canyon components of vegetation, open water, and natural slopes establish the character of the immediate area. Of equal importance as natural open space, the character of the canyons' riparian lowlands is drastically different than that of the upper slopes, which consist mostly of native scrub with some oak woodland."

Figure 4-8: Shows Canyon Hiking Trails

Table 4-1: Summary of Landscape Units

San Clemente Canyon: Both Visual Quality and Sensitivity to Visual Change listed as High.
Rose Canyon North: Both Visual Quality and Sensitivity to Visual Change listed as High.

Section 4.4.4.19 Rose Canyon North – Landscape Unit #19 (p. 4-22)

“Rose Canyon North is similar to the southern portions of Rose Canyon because of the type of vegetation found in both areas and their linear form; however, Rose Canyon North is unique as it is devoid of buildings. Single-family residences are built on the hilltops both east and west of I-5, but no buildings exist in the valley, making it a highly intact and uniform space. This landscape unit is highly sensitive to visual change and high in existing visual quality.”

Table 4-2: Summary of Viewer Sensitivity

Recreational users: Viewer sensitivity ranked “High”, viewer duration “Moderate” and “Distance from viewer to Project alignment” is “Foreground”. For Freeway Drivers, Viewer Sensitivity is “Low”, Viewing Duration is “Short”, and “Distance from Viewer to Project Alignment” is “Middle-ground”.

The Visual Impacts Technical Report (Figure 1-1) identifies Rose Canyon Open Space Park and Marian Bear Memorial Park as “Recreation/Visitor Centers”. Figure 1-6 identifies that the Mid-Coast Corridor trolley alignment will be adjacent to Rose Canyon Open Space Park for several thousand feet between SR-52 and La Jolla Colony Drive. Figure 1-2 identifies the double tracking of the rail line planned to occur south of SR-52 adjacent to Marian Bear Park, one of a number of rail projects underway in the LOSSAN corridor that will increase the number of trains. The Mid-Coast Corridor project will have a cumulative impact on Rose Canyon Open Space Park and the MHPA with the increased number of trains in the LOSSAN corridor.

Shockingly, despite this acknowledgment of Rose Canyon Open Space Park, the DSEIS/SEIR fails to identify any visual impacts from within the park. It fails to even do a simulation of the visual impacts, despite the fact that the planned trolley line runs in one location about 100’ from the trail, bringing 256 trolleys a day past this area of the park. Our attachments to this letter contain views from two different locations on the trail, showing what the view looks like now, and a simulation of what it will look like with the trolley. (See Attachments 1-4)

The SEIR/SEIR must fully analyze the visual impacts of the project on users of Rose Canyon Open Space Park and on wildlife.

The SEIS/SEIR must evaluate the visual impact on park users of moving the existing railroad tracks closer to the park, including any removal of vegetation that currently screens the view of the tracks and I-5.

The SEIR/SEIS must evaluate the visual impact on park users of the removal of vegetation, including numerous large trees, on the west side of the existing railroad tracks. These trees currently are part of the viewshed from the trail and help screen the park from I-5.

The DSEIS/SEIS fails to adequately address the lighting impacts on wildlife in Rose Canyon Open Space Park and the MHPA. The City of San Diego regulations stated in the MHPA include: 1.4.1 Compatible Land Uses

P. 48

“Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.”

III. Noise

Section 1.2 of the Noise and Vibration Technical Report identifies Rose Canyon Open Space Park as a major land use within the corridor, but fails to do any analysis of the noise impacts on park users, on wildlife, or on the MHPA. Yet 256 trolleys a day will pass within 100 feet of the park trail, creating an almost intolerable impact on park users. This impact must be mitigated.

The DSEIS/SEIR also fails to analyze the impact of noise on wildlife in the park and the MHPA.

The City of San Diego regulations stated in the MHPA include:

1.4.1 Compatible Land Uses

Noise:

“Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.”

The SEIS/SEIR must evaluate and abate the major noise impacts on park users and wildlife.

IV. Invasive plants

Transportation corridors introduce and spread invasive plants. The Mid-Coast project adds a major new mechanism for this to occur adjacent to Rose Canyon Open Space Park, Marian Bear Park and the MHPA. The SEIR/SEIS needs to address this issue.

The DSEIS/SEIR fails to adequately address this impact on Rose Canyon Open Space Park and on the MHPA. The City of San Diego regulations stated in the MHPA include:

“No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.”

V. Construction of a high earthen berm will help mitigate many of these impacts

To abate and mitigate the noise, visual, light and invasive plant impacts, we urge the construction of a high earthen berm on the east side of the existing railroad tracks. This berm should begin 100-200 feet east of the intersection of La Jolla Colony Drive/Gilman/I-5 and extend approximately 1,000 – 1,200 feet south along the east side of the existing rail line toward SR-52. It will have to end where the tracks intersect the creek channel and run adjacent to Rose Creek. The berm should be at least 12’ high and vegetated with native plants.

This berm would reduce the noise and visual impact of the trolley on park users and on wildlife. It would reduce the trolley's cumulative impact with SANDAG's planned increases in Coaster and Amtrak trains. It will help protect wildlife by directing them away from attempts to cross the four tracks, attempts likely to be fatal given the number of trains and trolleys and the planned fence on the west side of the trolley tracks. Building this berm will likely require cooperation with the city, as the 2-to-1 slope required will likely put a portion or all of the berm on park land. Potentially soil from the tunnel under La Jolla Colony Drive could be used for the berm.

The berm would help mitigate the problem of the spread of invasive plants by providing some buffer for the park and the MHPA against the increased intrusion of non-native plants.

The berm would help reduce the night-time light impacts on wildlife in Rose Canyon Open Space Park and the MHPA.

VI. Traction Power Substation (TPSS)

We strongly oppose the TPSS shown adjacent to Rose Canyon Open Space Park just south of La Jolla Colony Drive between the trolley and the railroad tracks. This will be yet another visual impact on the park, and possibly a noise impact. These impacts can be avoided by locating the TPSS elsewhere, where it is not visible from the park.

VII. Existing Restoration/Revegetation area west of the railroad tracks

The Noise and Vibration Impacts Technical Report states (p. 1-15) that 3,500 feet south of the I/5/Gilman Drive/La Jolla Colony Drive interchange the Mid-coast project will enter the Caltrans right of way. Adjacent to the existing bike path just south of this interchange there are multiple signs along either side of the bike path that state: "KEEP OUT - Habitat Restoration/Revegetation in Progress, city of San Diego Water and Wastewater Facilities Division." Who owns this area, what are the boundaries of the restoration/revegetation, and how are impacts on this restoration area accounted for?

VIII. Wildlife Corridors

The DSEIS/SEIR fails to recognize the importance of Rose Canyon and San Clemente Canyon as wildlife corridors.

The DSEIS/SEIR minimizes the importance of Rose Canyon and San Clemente Canyon as wildlife corridors. At 4.8.22, they state that these two corridors do not connect to large patches of natural open space to the south. This misses the point. It fails to acknowledge that these are important **east-west** wildlife corridors. These two canyons are last remaining greenbelts that stretch much of the way across the city. The link between these two wildlife corridors is extremely important. Moreover, protecting the quality of the habitat along the western portions of these two parks is important. The western sections of these two parks provide habitat that keeps these corridors viable. If the Mid-Coast project degrades the quality of the habitat in the western portions of these two parks through noise and visual impacts, it will hurt the viability of these two wildlife corridors and the linkage between them.

Rose Canyon and San Clemente Canyon are widely recognized as wildlife corridors, even by SANDAG. The following are two of the many documents that recognize this:

1. **Attachment 5** with this comment letter contains SANDAG's own regional map entitled

“Wildlife Corridors”. This is contained in the City of San Diego’s Bike Master Plan Update Draft PEIR (2012). SANDAG’s map shows Rose Canyon and San Clemente Canyon as wildlife corridors, shows their connection to each other under SR-52, and shows their connection to large amounts of open space at MCAS Miramar, which in turn provides connections to other large habitat areas.

2. The MCAS Miramar INRMP (Integrated Natural Resources Management Plan) recognizes Rose Canyon and San Clemente Canyon (Marian Bear Park) as wildlife corridors (INRMP: Biological Resources). The following are quotes:

INRMP Figure 4.5a. Conceptual Wildlife Corridors on Western MCAS Miramar

“Primary east-west corridors on MCAS Miramar are Rose and San Clemente canyons (Figures 4.5a and 4.5b). Rose Canyon originates east of the Main Station and drains west under I-805 on MCAS Miramar’s western boundary. This canyon provides connectivity to habitat patches west of the Station. Mule deer, bobcat, and mountain lion use has been documented in this portion of Rose Canyon. Water flows are intermittent in Rose Canyon, and coastal sage and chaparral vegetation provide cover for wildlife.”

“Rose Canyon, another east-west corridor within the open space of MCAS Miramar, funnels the movement of wildlife under the I-805 bridge over the railroad easement within Rose Canyon. This is the same railroad easement that connects Rose Canyon to Soledad Canyon north of MCAS Miramar. On the western side of I- 805 this wildlife corridor continues along the railroad easement to the west until it connects with Marian Bear Regional Park at the end of San Clemente Canyon and continues south.”

3. **Attachment 6** contains data from the San Diego Tracking Team, whose members have conducted wildlife surveys in Rose Canyon on a quarterly basis since October, 2003. The map showing the transect is included. The data show that many species, including bobcats, use the Rose Canyon wildlife corridor. Since bobcats are solitary animals and more sensitive to human disturbance than coyotes, their continued presence here is an indication that Rose Canyon is a functional wildlife corridor.

Given the importance of Rose Canyon and San Clemente Canyon as east/west wildlife corridors across otherwise urbanized landscapes, the SEIS/SEIR must evaluate the impacts on these corridors, including: noise, visual, nighttime light, increased risk of mortality due to an additional set of tracks and 256 trolleys/day, and degradation of habitat due to increased invasive plants.

To protect these wildlife corridors, we request the following measures:

1. Ensure that the passage under SR-52 provides connectivity for both wildlife and people. This should include a flat bench of vegetated land on the east side of the concrete creek channel extending the full length of the undercrossing to allow for wildlife passage. This will also allow passage for recreational users. Many bikers, runners, hikers, and scout groups currently make their way through this undercrossing, either on the current steep slope or in the concrete channel. The concrete channel is currently trapezoidal, making it possible to climb down into it and back up again. The Mid-Coast project will be replacing this with a deep channel with vertical walls and a fence along the east side. Thus replacing the current steep slope with a flat bench the entire distance will be necessary to provide connectivity for

wildlife and people.

2. A high earthen berm on the east side of the existing railroad tracks, as requested above, will help protect the wildlife that use these wildlife corridors by making it more likely they will stay to the east of the berm and not try to cross the four tracks. Given the high number of trains and trolleys, crossing the tracks will be very dangerous.

IX. Habitat mitigation

The SEIS/SEIR states that wetland mitigation for impacts in the Rose Creek watershed will be in the Rose Creek watershed, but fails to identify specific projects. Those must be identified in a timely manner that allows for public input.

We strongly oppose mitigation of upland impacts at Sage Hill. We understand why that is convenient, but it has a major environmental and community drawback. It allows further degradation of the Rose Creek watershed, and exports mitigation to a distant location. Each time this is allowed, it further degrades the Rose Creek watershed, its wildlife corridors, its MHPA, its habitat, its quality as an open space park for urban residents. And each time another project further degrades Rose Canyon and the Rose Creek watershed, the next project that comes along points to the preceding degradation as justification to degrade it further.

Someone has to stop this process. We call on SANDAG to take a different approach. Instead of hiding behind massive technical reports that play hide the ball and rationalize one negative impact after another as “not significant”, SANDAG should take the approach of “How can this project do the most that is technically possible to avoid, reduce, abate and mitigate for every impact? And how can we find ways to improve Rose Canyon and the Rose Creek watershed?”

X. Cumulative impacts

The Noise and Vibration Impacts Technical Report states that in 2030 there will be a total of 256 trolleys per day passing adjacent to Rose Canyon Open Space Park. For many hours a day, there will be 16/hour. This will be in addition to a projected almost doubling of the number of trains weekdays on the LOSSAN tracks: from c. 56 passenger trains/day in 2014 to a projected 92 passenger trains/day in 2030, plus a likely increase in freight trains (see LOSSAN Corridorwide Strategic Implementation Plan, Executive Summary, April 2012, p. vi). This will be a tremendous cumulative impact on users of the park, on wildlife, and on the habitat. The SEIS/SEIR needs to address all impacts related to the cumulative impacts of these two projects on users of the park and on wildlife in the park and MHPA.

Additionally, there are numerous other projects that will have impacts on Rose Canyon, Rose Canyon Open Space Park, the MHPA, and the Rose Creek watershed. These include:

- the widening of I-805
- the BRT station and Park and Ride at Nobel/805
- the proposed Regents Road bridge
- the proposed widening of Genesee Avenue from Nobel to SR-52

These projects will cumulatively have major impacts that will degrade the park, the MHPA and the watershed. The SEIS/SEIR needs to address these impacts, not pretend that they don't exist, can't be foreseen, or will be mitigated by someone else in the future.

We recommend that SANDAG reduce these cumulative impacts by eliminating the planned construction of a BRT station, Park and Ride and Direct Access Ramp (DAR) at Nobel/805. This massive \$100 million project is unnecessary and in the wrong location. The planned south to north BRT route should exit I-805 on La Jolla Village Drive, where the major employment center is, not on Nobel, which is in a far corner of the community. There is little need for a bus station or a park and ride at this location. And there is little need for a DAR at this location. The \$100 million saved by not doing this project could be spent instead on the Mid-Coast Corridor Transit Project, whose budget is already climbing and sure to climb more.

As we said at the beginning of this letter, it is always going to be easier to pass the buck, to use technical analysis to cloak the reality of impacts, to wriggle out of confronting the fact that we are continuing to degrade our last remaining urban open space lands one project at a time. This project is a prime example. It is truly death by a thousand cuts. The Mid-Coast Corridor Transit Project will have major impacts, as we have pointed out here – and there are certainly many more, that we have not anticipated, not considered or not mentioned.

If this project is truly about smart growth, it's about protecting our urban open space parks, our urban MHPA lands, the places where bobcats can still roam, people can still hike, and kids can still find a connection to nature, right in the heart of urban San Diego.

Sincerely,

Deborah Knight
President
Friends of Rose Canyon

Attachments

Att. 1 - View 1: current view from the trail in Rose Canyon Open Space Park less than 100' from planned trolley alignment (© Friends of Rose Canyon)

Att. 2 - View 1 with simulation of trolley (© Friends of Rose Canyon)

Att. 3 - View 2: current view from another location on the trail through Rose Canyon Open Space Park, c. 200' from the planned trolley alignment (© Friends of Rose Canyon)

Att. 4 - View 2 with simulation of trolley (© Friends of Rose Canyon)

Att. 5 - Wildlife Corridors: SANDAG map from Bike Master Plan Update Draft PEIR, showing Rose Canyon and Marian Bear Park as wildlife corridors

Att. 6 - Data from San Diego Tracking Team showing regular use of Rose Canyon by wildlife, including bobcats. Bobcats are far more sensitive to human disturbance than coyotes, and their presence is good sign of the habitat quality and connectivity.

Att. 7 - Map showing Rose Canyon transect used by San Diego Tracking Team for quarterly monitoring reports in Att. 6.