



Friends of Rose Creek *

"Connecting Our Communities"

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Via Fax and Email Transmission

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RE: Comments on Mid-Coast Trolley *Draft Supplemental Environmental Impact State/Subsequent Environmental Impact Report (SEIS/SEIR)*

PREFACE

The CEQA and NEPA documents provided by SANDAG for review by stakeholders are greatly appreciated by those of us who are very much involved in protecting and conserving the biological and physical assets of the Rose Creek Watershed. These assets are directly in harm's way due to proposed activities described in these CEQA and associated documents.

It is not our intent to be obstructionists to the proposed project as there is a general community consensus that the project is needed. However, we believe that the conservation of these biological and physical assets of the watershed are of equal importance to the short-term and long-term interests of ALL of the stakeholders. Hence, our critique is addressed mainly to issues of "significant and cumulative impact" of the proposed project short-term and long-term on these community" treasures."

We have found that there is insufficient detail of the impact of activities of construction, main and ancillary transportation operation, management and environmental agency approvals and oversight, and of stakeholder involvement in setting and monitoring benchmarks. More specifically, we conclude that the proposed "mitigation" measures are insufficient to remedy these impacts.

Furthermore, this document completely fails to take into account Section 15355 of the CEQA Guidelines that require "Cumulative impacts" to be addressed when are individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. Given that SANDAG is involved in not only the Mid-Coast Trolley project, but also the LOSSAN Double Tracking and the Coastal Rail Trail Project, not to mention SANDAG's awareness of the

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California High Speed Rail project, and the SANDAG authored Regional Transportation plan, the Draft SEIR/SEIS must address the cumulative impacts of all these projects.

Water Quality

The information needed to provide pertinent comments to water quality impacts and mitigation measures are not possible until details of the Water Quality Management Plan are available. However, please note the following comments.

Runoff

According to the Draft SEIR/SEIS, grease will come off the trolley. Although the grease is advertised as biodegradable, biodegradable substances require microbes in soil to biodegrade. Because the trolley will be crossing open water, grease that falls into the water will not biodegrade. What preventative measures will be taken to prevent grease from entering Rose Creek? What steps will be taken to remove grease that has entered Rose Creek? What will be the cumulative impacts of toxic runoff from the trolley and the increased number of MetroLink and Amtrak on the double tracked lines and from the High Speed Rail trains?

Brake dust is a toxic substance and as such must be prevented from entering the soil or water in and around Rose Creek. Brake dust does not biodegrade in the soil as it contains heavy metals and asbestos. What are the specific technical configurations that will be utilized to contain brake dust and grease? How will these steps prevent brake dust and grease from entering the creek?

Catch basins as part of a BMP

While catch basins assist with breaking down biodegradable components, many of the materials the trolley will deposit in the area are not biodegradable, for example brake dust. Given the constrained nature of the Rose Creek area, there is no place to put catch basins unless buildings are removed. Where specifically are catch basins going to be located and what materials are intended to be broken down in the catch basins?

Water Quality Management Plan [WQMP] is required for such a project

CEQA requires a Water Quality Management Plan be completed for impacted waterways. Rose Creek has been defined as an impaired waterway under 303(d). No such plan is included.

Many segments of Rose Creek (Cal Watershed 90640000, USGS HUC 18070304) are defined as impaired waterways on the California 2010 303(d) list (combines category 4a, 4b and 5) and currently requires the development of a Total Maximum Daily Load (TMDL). As no TMDL has been developed for Rose Creek or the Rose Creek Salt Marsh, how much additional quantity of heavy metals and selenium will this project contribute to this already impaired waterway? Will a TMDL be developed in conjunction with this project in order to gauge the negative water quality impact to Rose Creek and Mission Bay and to insure that levels do not exceed the TMDL? As much of the toxic runoff is attributed to Highway/Road/Bridge Runoff; how will this project reduce overall heavy metals in the creek? What will be the cumulative impacts of toxic runoff from the trolley and the increased number of MetroLink and Amtrak on the double tracked lines and from the High Speed Rail trains?

According to the Regional Water Quality Control Board, Rose Creek exceeds the standards for Toxicity and Selenium due to urban runoff. How will the Build Alternative prevent any additional toxic substances and any additional Selenium from entering Rose Creek? What will be the cumulative impacts of Toxicity and Selenium runoff from the trolley and the increased number of MetroLink and Amtrak on the double tracked lines and from the High Speed Rail trains?

Current levels of Diazinon and Benthic Community Effects were below the thresholds established. What is the expected increase in these levels with the Build Alternative as outline in the SEIR/SEIS? What will be the cumulative levels of Diazinon and Benthic Community Effects runoff from the trolley and the increased number of MetroLink and Amtrak on the double tracked lines and from the High Speed Rail trains?

Nine acres of Mission Bay (area at mouth of Rose Creek only) are polluted with lead and are scheduled to have a TDML established by 2019. How will the increased loads of lead from the trolley be mitigated so as not to prevent the targeted TDML completion date of 2019 for Cal Watershed 90640000 (USGS HUC 18070304, Waterbody ID CAB9064000020050104185659)?

Flooding

The Draft SEIR/SEIS is required to address cumulative impacts. No mention was made of the additional storm water flows being released from the North City Reclamation plant as part of the intermittent stream discharge project. How will the additional flows impact channel narrowing, water levels and the potential for flooding of businesses and homes?

The implementation of Executive Order 11988 in transportation projects is addressed by Title 23, Code of Federal Regulations, Part 650, Subpart A (23 CFR 650A) entitled "Location and Hydraulic Design of Encroachment on Floodplains". When SHS transportation improvements encroach on a base floodplain, Caltrans is responsible for the performance of a Location Hydraulic Study (same as Figure 804.7A Technical Information for Location Hydraulic Study located in chapter 804 of the Highway Design Manual) to assess the risk involved. Has such a study been done? If so, how does one access this information? Specifically, what are the impacts on natural and beneficial flood-plain values, the measures to minimize flood-plain impacts associated with the action, and the measures to restore and preserve the natural and beneficial floodplain values impacted by the action?

How many acres of the Longitudinal Encroachment will occur in a regulatory floodway? How will Longitudinal Encroachment limit wildlife access to water?

Transportation

While providing additional public transit in San Diego is a laudable goal, the point of intersection must be compatible with the communities it serves. The currently proposed trolley station to server residents and visitors of Pacific Beach not only fails to address how non-motorized travelers can reach the beach from the proposed Balboa Avenue trolley station, it worsens travel times for vehicular travel.

Active Transportation

Active transportation is human powered transportation. For the health of the community and to further reap the benefits of the trolley, provisions must be included in the Build Alternative to facilitate human powered travel to and from the trolley.

Rose Canyon Bike Path

Why are recreational users of the Rose Canyon Bike Path not considered “Significant Receptors” under CEQA for noise? The use and enjoyment of this popular trail is depending on the visual character of the area as well as the ability to hear one’s self think. The addition of the trolley with its overhead lines and frequency of service combined with the cumulative impacts of other rail-oriented projects in this location has not been addressed at all in the Draft SEIR/SEIS.

What will the noise level be just north of the Hwy 52/I-5 Interchange when two trolleys, a Coaster train and an Amtrak train are passing simultaneously?

Please provide information on the increased danger of car/bicyclist crashes based on moving the bike lane closer to the freeway with nothing but a chain link fence in between? What steps will this project take to reduce such collisions? What steps will this project take to reduce the dangerous night blindness caused by northbound freeway traffic headlights blinding southbound bike path users? Where will the bike path end up when all SANDAG planned projects and the California High Speed Rail project are introduced into the corridor?

Access to Balboa Ave station

The current location of the Balboa Avenue trolley stations provides no access for pedestrians, bicyclists, skateboarders, and roller bladers from Pacific Beach. Furthermore, the San Diego Bicycle Master Plan has no plans to link to the Balboa Avenue Station. How will the area surrounding the proposed Balboa Avenue station be modified to comply with Caltrans Pedestrian and Bicycle Facilities in California: A Technical Reference and Technology Transfer Synthesis for Caltrans Planners and Engineers July 2005? What is the justification for locating a trolley station that is not accessible by pedestrians, bicyclists, and skateboarders?

Access to claremont Drive Station

While the proposed claremont Drive trolley station is adjacent to Mission Bay Park, the current ingress and egress to the park via claremont Drive is extremely dangerous to non-motorized traffic. How will this project create a safe and separated pedestrian/bicycle bridge to Mission Bay park so that transit users with small children can safely reach the park?

Vehicular Transportation

Mission Bay Drive/Garnet Ave impacts

Regarding section 3.4.2.2 for traffic impacts to the Mission Bay Drive/Garnet Avenue intersection, only one of multiple potential mitigation options was identified for the Mission Bay Drive/Garnet Ave Intersection.

Mitigation for ongoing negative impacts to traffic flow at this already highly congested intersection should include funding and construction of access for non-motorized vehicles into the beach areas by constructing safe and legal bicycle/pedestrian crossing of the tracks from Morena @ Jutland Drive to Santa Fe Street as well as a crossing at Hwy 52 and I-5. Finally, a separated bicycle/pedestrian path should be constructed from the intersection of Moraga and Balboa Ave that connects to the Balboa Ave Trolley Station and the Rose Creek Bike Path just west of Mission Bay Drive and Damon Street. This would increase the number of non-motorized trips through the area and decrease vehicular traffic. Please include an analysis of this mitigation measure in the final EIR/SEIS.

One of the primary reasons for congestion at this intersection is that both the communities of claremont and Pacific Beach access I-5 north of these communities through one freeway onramp/off-ramp. Why has no study been done to address a claremont community on-ramp/off-ramp from Morena Blvd. just south of Balboa Avenue? This potential solution has the ability to reduce traffic delays below current existing conditions. The two mitigations measures identified in these comments would allow non-motorized transit users to safely reach the Balboa Avenue Trolley Station from Pacific Beach and allow bus transit to provide on-time service to the same station.

Transportation Appendix

Table 4-32 indicates estimated pedestrian trips but does not account for bicyclists, skateboarders, or roller bladers in the study. In the Pacific Beach community, these numbers are likely to be high. Please provide a seven-day study of non-motorized trips through this Mission Bay Drive/Garnet Avenue intersection. The number of trips has the ability to increase exponentially should the above referenced mitigation measures be implemented as part of this project. In other words, non-motorized access to the location of the proposed trolley station is constrained by hazardous conditions at this intersection. Remediating the conditions will lead to increased use of Active Transportation between Claremont and Pacific Beach. Furthermore, bike route improvements including green lanes and other visual markers should be made to Balboa Avenue east of I-5 as well as Moraga Avenue between Balboa Avenue and claremont Mesa Blvd to encourage bicycle connectivity between the proposed trolley station and Claremont. The Balboa Avenue Citizens Advisory Committee is working on plans in this area and their planned projects should be documented as part of the cumulative impact in the area.

Table 4-60 – shows adverse impacts to Mission Bay Drive/Garnet – delays would occur from traffic traveling to the Balboa Ave station resulting in an increase from an average of 72-second delay to 77 seconds – thereby discouraging people from using the station. The study identifies that currently the intersection is at an unacceptable level of service and the build alternative will worsen the situation. Furthermore, as it is unsafe for pedestrians, bicyclists, skateboarder and roller bladers to cross at this intersection, the ability of trolley riders to utilize the Balboa Avenue station to enter or leave Pacific Beach is very challenging. The SEIR/SEIR should include other agency plans for addressing this bottleneck, as it is a significant impediment to usage of the trolley for beach area residents and visitors.

Table 4-63 shows minor improvements to pedestrian access by modifying the sidewalk on the South side of Balboa from I-5 to Moraga. However, as the proposed enhancements do not connect users to any other destination or location, how will pedestrians in claremont and Pacific Beach get from safe sidewalks in these respective communities to the improved sidewalk? As CEQA requires cumulative impacts, proposed enhancements to this area that are outside the scope of the Mid-Coast Trolley

project such as the LOSSAN double tracking, Coastal Rail Trail and California High Speed Rail should be included.

The Draft SEIR/SEIS identifies that road closures on Balboa Avenue will occur during constructions. These closures will have a significant adverse impact on ingress and egress to Pacific Beach. All construction work should occur between October and April in order to prevent significant delays and avoid financial losses to Pacific Beach business due to visitors being unable to reach the restaurants and bars in a timely fashion.

Buses

If the above recommendations to improve traffic at Mission Bay Drive/Garnet are not implemented in conjunction with this project, buses operated by MTS will be severely constrained in reaching the trolley station – especially on peak summer afternoons. How will MTS/SANDAG insure transit patrons can reach their destination on time when patrons board at the proposed Balboa Avenue Station?

Train/Track

Please identify the take of the historic Rose Creek floodplain that will be impacted by straightening of the Elvira Curve. As CEQA requires cumulative impacts and as SANDAG is fully aware of the LOSSAN corridor double tracking project, please clearly indicate how much of the historic Rose Creek floodplain will be consumed by the LOSSAN double tracking. Currently there are three additional rail tracks being proposed and the Draft SEIR/SEIS does not identify the cumulative impacts of these projects or the California High Speed Rail project.

Biology

Impacted areas must be mitigated within closest site

All impacted areas should be mitigated within the closest location possible and within the Rose Creek Watershed. No mitigation should take place outside this watershed. Potential mitigation for old growth oaks at the west end of Marian Bear Natural Open Space Park can take place within the park as there are multiple stands of oaks suffering from golden spotted oak borer. Given that the project has the potential to affect old growth, the mitigation in Marian Bear Park should either treat five existing old growth oaks in other parts of the park or plant five new oak trees with gopher protection for each old growth tree removed.

Cumulative impacts are significant

The concrete channel north of Hwy 52 has vegetation and functions as a bird corridor. How will the new design maintain cord grass and other plant cover to provide wetland-stopping points for native bird species?

Currently, the rail corridor along Rose Creek is not fenced and the frequency of trains is minimal. Due to the increased frequency and fencing of tracks, wildlife and human movement across the tracks will be effectively halted. How will this project create appropriate and frequent access points for wildlife and human movement? Given a fenced project, how will wildlife and humans move from the southern

end of Rose Canyon Open Space Park to Marian Bear and back? How will wildlife and humans connect from one of these parks to the other? How will wildlife and humans connect with one of these parks and the Rose Canyon Bike Path?

The stretch of Rose Creek from the south end of Marian Bear Park to its terminus in Mission Bay Park was not included in *Chapter 4 Analysis and Mitigation, Figure 4.5. Community, Park and Recreational Facilities within One-Half Mile of the Project Alignment*. While not currently designated as a park, this section of the creek functions as a recreational facility for birders, bikers, and hikers. Furthermore, impacts to one portion of the creek flow downstream and have the potential to negatively affect downstream sections. Therefore, all of Rose Creek should be identified as a "recreational facility"

The 700-foot concrete channel north of Hwy 52 is a bird movement corridor. The Draft SEIR/SEIS only address wildlife movement of mammals and aquatic species. Please address how the rebuilt channel will facilitate bird movements in lieu of the several species of birds that were identified in the document as threatened or endangered? How will these bird species move between areas during construction?

Mitigation to wetlands

Biological Appendix Section 6.2.2.3 – short term impacts to wetlands.

Mitigation for temporary impacts to existing wetlands should not be to return them to pre-construction conditions and vegetation, but to return them to functioning wetlands. In other words, they should be left in better condition than when they were found.

Mitigation to Uplands should take place in Rose Canyon and Marin Bear Park – not Harmony Grove -- an area not adjacent to the project. Multiple degraded upland sites exist in both City of San Diego Open Space Parks - please identify a location within these two parks for mitigation instead of Harmony Grove. A list of potential mitigations sites is available on-line at http://www.rosecreekwatershed.org/docs/RCW_RestorationOpportunities_Fina_Lowres.pdf

In reference to short-term impacts, Biological Appendix, section 6.2.1, orange fencing is not enough to prevent short terms impacts to wetland habitats during construction. Straw wattles must be used to prevent construction soils and other materials from flowing into the creek. Furthermore, nighttime construction lighting and noise should be minimized to avoid disturbing wildlife.

Adverse Edge Impacts

7.1.6 Biological Appendix – While the existing project falls within the MTS right of way, the right of way is primarily in the historic Rose Creek floodplain. Furthermore, the current utilization of this right of way is very limited in scope. While noise and lighting are already sporadic issues, the Build Alternative will create change almost continuous noise and lighting and this should be considered a significant change. Please justify the determination that this is an insignificant change. Please address how rail traffic every 7.5 minutes is a more severe impact than once every hour. What will be the cumulative effect of more frequent trains on the LOSSAN tracks, the Mid-Coast Trolley and California High Speed Rail? Please identify the total percentage of time a train will be passing by in a given daylight hour?

In 7.2.2 Biological Appendix, while the draft SEIR/SEIS correctly identifies that the MSCP was designed to compensate for regional loss of biological resources, this project is degrading the MSCP by being located adjacent to it. The noise and light pollution when coupled with toxic materials coming off the trolley and the tracks will have a significant and negative impact on the MSCP in Rose Canyon Open Space Park. Earthen berms planted with site-specific native vegetation have the ability to contain some of the immitigable impacts from this project and would buffer humans from the trains.

The Draft SEIR/SEIS states that noise pollution does not need to be addressed on the section of the Rose Canyon Bike Path just north of Hwy 52 due to the lack of a "significant receptor." Recreational users can and should be considered as receptors. Noise analysis can be performed at five or six points along this path.

Furthermore, the cumulative noise impacts of the freeway traffic, the LOSSAN double tracking, California High Speed Rail and the Mid-Coast Trolley will result in significant degradation of the user experience on the Rose Canyon Bike Path. The use of earthen berms planted with appropriate native vegetation between the freeway and the bike path would provide some relief from noise and light pollution as well as protection from vehicles careening off the freeway. As the bike path will be re-aligned closer to the freeway, the risk of a motorist killing a bicycle will increase significantly.

How are noise impacts on biological resources determined? How will the frequency of rail traffic change the wildlife in the area of the tracks? The Draft SEIR/SEIS indicates that this is not a new use of the rail corridor. However, the frequency with which rail traffic will travel is being increased substantially. Please identify studies that show the impacts of rail traffic on wildlife which include train frequency.

Vibration

Chapter 4, Table 4-14: Noise and Vibration Mitigation Measures: While we appreciate the measures to be utilized adjacent to Marian Bear Natural Park, Noise Mitigation Row N2 (low impact frog) should also be implemented from Hwy 52 north to Gilman Drive and Noise Mitigation Row N2 (low impact frog) should also be implemented from Hwy 52 south to Balboa Avenue to allow recreational users and wildlife to experience some measure of the natural ecosystem. Again, the projected trolley frequency of a train every 7.5 minutes must be analyzed with the cumulative impacts.

Visual Impacts

Visual impacts are currently underreported in the draft SEIR/SEIS due to a dearth of locations from which visuals were taken. The visual impact should be addressed every one hundred feet from Balboa Avenue to Gilman Drive as the landscape changes frequently. Visual impacts must be identified at the south end of Marian Bear Natural Park, the Santa Fe Park RV Resort, and The Rose Canyon Business Park.

The study is vague on the how concrete will be used to prevent negative visual impacts. The CALTRANS study referred to only addresses the I-5 corridor north of La Jolla Village Drive.

Furthermore, concrete structures fundamentally change the nature of the user experience in the Rose Canyon MSCP area.

Section 4.4.2, which discusses visual impacts, does not mention the negative impacts in Rose Canyon Open Space Park south of Gilman and north of Hwy 52. Currently, when using the Rose Canyon Bike Path and looking to the east, all one sees is nature. The Build Alternative will create overhead power lines where none previously existed and due to the high frequency of trolley traffic, users will mostly see trolleys instead of trees in the Rose Canyon West & Rose Canyon North areas. There are three design themes in the CALTRANS document. Which theme will be followed as the study area is primarily south of La Jolla Village Drive and the design document addresses sections north of La Jolla Village Drive.

The California Coastal Act of 1976 established specific policies for guiding the Commission's planning and regulatory responsibilities. Section 30251 of the Act, in particular, addresses the design and aesthetics of bridge railings and barriers. It specifies that "the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance." Provisions of the Act give clear policy direction for siting and designing development to achieve the objectives listed below.

- Views both of and from the ocean and scenic areas should be protected.
- The alteration of natural landforms should be minimized.
- Development should be designed and sited to ensure compatibility with the context of the surrounding area.
- Visual qualities in visually degraded areas should be enhanced.
- Development in highly scenic areas should be subordinate to the character of its setting.

Therefore, the use of concrete in the area north of Balboa Avenue and south of Gilman drive should be minimized and subordinated to the natural landscape. Please address how native vegetation will cover most of the concrete structures being built as part of this project in order to maintain the natural aspects of this area?

Chapter 4.0 Special Status Species (P. 94)

The draft SEIR/SEIS indicates that impacts due to shading would be minimal, as the plants would be destroyed during construction. Native plants destroyed during construction must be replanted with equivalent natives. Therefore, please address how the shading will impact the native plants. No mention is made of the cumulative impacts. The existing impacts on the Western end of Marian Bear Park are the freeway, commercial buildings, the LOSSAN double tracking, the Mid-Coast Trolley and California High Speed Rail. Per CEQA guidelines, the Mid-Coast Trolley project must include the cumulative impacts, not just the additional impacts in an analysis of impacts to special status species.

The impacts to jurisdictional waters include the replacement of a 700-foot open concrete channel with upstream and downstream improvements; however, these improvements are not defined. What are the proposed improvements? How will the new channel maintain the native habitat and cover for bird travel in the area? What methods will be used to maintain this channel? How will damage done to native habitat during maintenance be mitigated on an on-going basis?

Chapter 4 – Mitigation

On page 105 – just above section 4.8.5, the Draft SEIR/SEIS identifies that 7.58 acres of wetland mitigation will be required. All wetland mitigation should be done in Rose Creek (not in San Clemente Creek) outside of MTS right of way. Furthermore, all mitigation should be done to a standard of a fully functioning wetland, not to the existing conditions as some portions of the creek have severely degraded existing conditions.

The additional project features WOULD be visually prominent in this area. The existing railroad tracks are not prominent nor are there any buildings. Please define the mitigation measures for the visual impact of retaining walls.

In Chapter 4 Environmental Analysis, Section 4.4.4 – Mitigation Measures within Caltrans right of way are being designed to follow the Caltrans Design Guidelines for the I-5 North Coast Corridor Project. However, this project begins at La Jolla Village Drive and goes north. Please address the design standards for the portion of this project south of La Jolla Village Drive.

CONCLUSIONS AND RECOMMENDATIONS

Conclusions

As stated earlier in this critique, we have found that there is insufficient detail of the impact of activities of construction, main and ancillary transportation operation, management and environmental agency approvals and oversight, and of stakeholder involvement in setting and monitoring benchmarks. More specifically, we conclude that the proposed “mitigation” measures are of insufficient detail to result in remediation of these impacts.

Construction

Construction activities of the magnitude of the Mid-Coast Corridor Transit Project will necessarily produce substantial waste materials, including airborne dust, sediment, and solid waste that are likely to be toxic, probably containing asbestos, toxic oils and grease, and fine dust particles-- all of which will require containment, sorting, and disposal into the appropriate landfills. Protection from these activities is essential, but we found no analysis of these materials or methods of disposal and containment in the CEQA/NEPA document and efforts to find referenced reports were not successful. In fact, the words chosen in the document may be summarized from section 4.17” All construction impacts could be mitigated below CEQA significance through a combination of measures included in project design, mitigation measures, compliance with regulations, and BMPs.” We find these words insufficient as an explanation of how SANDAG plans to meet its mitigation obligations.

Water Quality

In this report, we pointed out that Rose Creek is an impaired water body. We conclude from our analysis of these documents that the Project is likely to result in further degradation of the water bodies

that will be affected. A completed and competent Water Quality Management Plan would be a big step towards providing assurance of improved water quality in all of the water bodies near the path of the Project.

Management

The CEQA documents mentioned BMPs, a Transportation Management Plan (TMP), a Traffic Management Plan, incident Management programs, Real Estate Acquisition Management Plan, coastal zone management plans, etc., etc., etc. Most of the referenced plans are to be done (or may be done) sometime in the future. What is missing are specifics of the management team, schedules, oversight, and protocols including how stakeholders are to participate in the on-going decision-making process.

Recommendations

As a result of this CEQA process, we hope to see detailed specifics on the issues mentioned above, how the work is to be accomplished and the specific safeguards for the environment that will be employed.

Thank you in advance for addressing these important issues.

Respectfully,

A handwritten signature in blue ink, appearing to read 'KZirk', with a long horizontal flourish extending to the right.

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