



DATE: June 1, 2010

TO: Leslie Blanda, Mid Coast Project Manager, SANDAG

FROM: Ann Van Leer for the Rose Creek Watershed Alliance

SUBJECT: Mid Coast Scoping Comments, Draft SEIS-SEIR

Thank you for the opportunity to present scoping comments on the proposed Draft SEIS/SEIR for the Mid Coast Project.

We write as members of the Rose Creek Watershed Alliance, an alliance of community organizations dedicated to improving the Rose Creek Watershed (RCW). Over the past 6+ years we have been working together and with San Diego Earthworks (SDEW) as stakeholders of a plan to improve the Rose Creek watershed which begins on MCAS Miramar at the headwaters of Rose and San Clemente creeks and ends in Mission Bay at De Anza Cove. The plan, known as the Rose Creek Watershed Opportunities Assessment (Assessment), was developed by San Diego Earthworks using funds provided by the Coastal Conservancy, the San Diego Foundation and the County of San Diego. The Assessment was supported by the City Council in 2008 as a guidance document for the watershed. The Assessment can be found on the project website at www.rosecreekwatershed.org.

As a guidance document, the Assessment is a tool that can be used by decision-makers such as SANDAG to minimize the impacts of projects proposed for the watershed. In fact, the Assessment contains a series of recommendations that if implemented or considered by project proponents such as SANDAG can enhance the watershed and, in the case of Mid Coast, could help SANDAG better meet its Mid Coast Corridor Transit Project Goals and SANDAG Regional Policy Objectives; the recommendations for action are in section 2 of the Assessment.

San Diego Earthworks has been working to implement the recommendations of the Assessment including the development of a watershed hydrology model that will be available to SANDAG and others proposing watershed projects. Some data-sharing between SANDAG and the watershed project has already occurred and we encourage SANDAG to utilize the Assessment and associated technical resources so as to not duplicate efforts and to maximize use of limited public resources.

Potential Impacts of the Mid Coast Corridor Transit Project (Mid Coast Project) on the Rose Creek Watershed

The Mid Coast Project, as proposed in all alternatives, will traverse the spine of the lower watershed, an area we call Lower Rose Creek south of SR-52 and extending north of SR-52 to La Jolla Colony Drive. In Alternative 3, it will also head east into Rose Canyon. By your own draft Comparative Evaluation of Alternatives, Alternative 3 will have a significantly greater impact on the environment. For this reason, we support the removal of Alternative 3 from consideration and encourage SANDAG to evaluate Alternatives 1 and 6 only with Alternative 1 as the preferred alternative.

Because all proposed alignments have the potential to significantly affect the RCW, and possibly foreclose the improvements recommended in the Assessment, we ask that SANDAG review in the Draft SEIS/SEIR each recommendation of the Assessment found in section 2 and specifically address the potential of the Mid Coast Project to implement and/or undermine or controvert each recommendation. While we request that SANDAG review and comment on all the Assessment recommendations, we have highlighted below those where the potential nexus between the projects is strongest and encourage SANDAG's specific consideration of the following:

Protecting and Enhancing Biological Resources and Controlling Invasive Exotic Species

The Assessment recommendations include enhancing the biological connection of the RCW to Mission Bay through Lower Rose Creek, controlling invasive species throughout the watershed, restoring and enhancing habitats throughout the watershed, protecting and enhancing wildlife corridors (including Lower Rose Creek) through minimizing, eliminating or improving existing barriers or eliminating impacts to new barriers and establishing consistent land management throughout the RCW.

Today habitat and land management is disjointed throughout the watershed based largely on ownership. For example, in some areas there is active management of invasive species, such as in Marian Bear Memorial Park and Rose Canyon Open Space Park; in other areas no habitat management occurs at all such as in the current MTS/MTDB rail right of way. What that means in the rail right of way is that invasive plant seeds are spread by the movement of trains through the watershed. The result of this current lack of resource management by MTS/MTDB is degradation of the quality of the watershed's biological resources. With additional trains passing through the corridor as a result of the Mid Coast

Project, additional infection will occur. According to the California Invasive Plant Council, invasive plants displace native plants and wildlife, increase wildfire and flood danger, consume valuable water, degrade recreational opportunities, and destroy productive range that would otherwise be available to support wildlife including endangered and threatened species. The Multiple Species Conservation Plan (MSCP) calls for the control of invasive species for the same reasons.

Assessment recommendation 2.2.2 calls for the management of invasives throughout the watershed in management zones, including zone 7, the rail right of way. *We recommend that the Draft SEIS/SEIR analyze the impact of the Mid Coast Project on the spread of invasive exotic species and consider as potential mitigation of that impact that MTS/MTDB begin active management of invasive species in the existing right of way through the entire watershed (as seeds are both wind-blown and move downstream) to control the spread of invasive plants associated with rail use of the watershed.*

Concerning barriers to wildlife movement and recreational use, new trains will restrict wildlife movement through the watershed and the potential impacts must be reviewed in the Draft SEIS/SEIR. However, more significantly than moving trains, any fencing of the tracks could seriously restrict wildlife movement directly counter to recommendations of the Assessment and the MSCP. New trains will also affect public recreational movement in the watershed and could create serious user conflicts. *Accordingly, we oppose any fencing of the tracks or rail corridor unless the specific purpose is to enhance and/or direct wildlife movement and enhance public safety.* The Assessment addressed the issue of recreational crossings in Recommendation 2.5.5 which we discuss later in this letter.

The Draft SEIR/SEIS must also evaluate other impacts on wildlife, including but not limited to: habitat loss and alteration, noise, and lighting. All LRT alignments will have impacts on areas adjacent to and in the MSCP. The Draft SEIR/SEIS must fully evaluate and address these impacts.

Establishing consistent land management throughout the watershed is a very important issue for the stakeholders. A long-term goal is to connect the upper and lower watershed (Rose and Marian Bear Memorial parks with Lower Rose Creek to Mission Bay) as one regional natural open space resource. The current disjointed management as described earlier leads to a loss in resource value and degradation of taxpayer investment.

As another example of this, the native habitat at the west end of Marian Bear Memorial Park that extends into and south along Lower Rose Creek is some of the highest quality habitat in the entire watershed. This is the same habitat that SANDAG proposes to convert to rail right of way in 5.2.13 of the Draft Comparative Evaluation of Alternatives. This habitat begins in Marian Bear Memorial Park and extends into Lower Rose Creek. The northern portion, which is the highest quality, benefits from the management of Marian Bear Memorial Park but as the creek moves south and management ceases, infections by invasive species begin, and the creek becomes a haven for illegal activities. Yet Lower Rose Creek could serve as a flood control channel and a regional recreational resource if managed consistently.

A fundamental purpose of the Assessment is to encourage management of the watershed as an integrated natural, flood control and recreational resource to maximize public benefits and taxpayer resources. As mentioned earlier, the rail corridor should be managed consistent with that integrated effort (but has not been to date). Reducing the amount of park land in the watershed, especially parklands with quality habitat, as SANDAG has proposed, should be avoided as it runs counter to creating an integrated natural system. *Accordingly, we oppose the proposal to sell any public parklands to add to the rail right of way as described in Draft Comparative Evaluation 5.2.13 on page 5-79 as inconsistent with enhancing the watershed and detrimental to creation of an integrated regional open space system. It is also inconsistent with SANDAG's own Regional Policy Objective to limit potential impacts to sensitive habitats. We encourage instead that the proposed rail alignment stay within the current rail right of way.*

Maximizing the Benefits of Mitigation

Assessment Recommendation 2.2.3 calls for the expansion and enhancement of riparian and wetland habitats and the restoration of upland habitats. Additionally, recommendation 2.6 calls for the development of data and models to help understand the hydrology and hydraulics of the watershed, reduce erosion, investigate the feasibility of modifying or removing concrete flood control channels and reduce water pollution.

The Assessment also includes recommendations identifying specific candidate restoration sites for potential improvements and calls for further analysis of those sites including modeling and consideration of their potential positive and negative impacts. Depending on the impacts that SANDAG must mitigate for the Mid Coast Project, these *Assessment-recommended sites could be appropriate for Mid Coast Project mitigation and we would encourage they be considered as part of the Draft SEIS/SEIR* so that mitigation and restoration efforts can be coordinated and implemented seamlessly.

As you know, SDEW has received a grant to develop the hydrology and hydraulic data as recommended in the Assessment and that study is well underway. One of the original impetuses for the Assessment was to investigate whether any of the current concrete flood control channel could be removed without negatively affective flood carrying capacity. An associated task was to model the potential restoration sites recommended in the Assessment, to verify their feasibility and potential impact on watershed hydrology.

We urge SANDAG to work closely with the Rose Creek watershed team to share data and use the hydrology and hydraulic models to analyze the impacts of the Mid Coast Project on the watershed including erosion and channel undercutting, both of which are current issues in the watershed. *We oppose any additional concrete channelization or cover of San Clemente or Rose creeks as inconsistent with the Assessment's goal to enhance and improve the watershed. However, should new concrete be necessary in the channel under Highway 5 and 52, we urge SANDAG to mitigate that through removal of concrete elsewhere in the channel so there is an overall net gain (i.e., a reduction in concrete cover) as a result of the Mid Coast Project.*

Also, importantly, any mitigation associated with impacts to Rose Canyon or San Clemente canyons (including the City Parks) must take place in those canyons. Additionally, any impacts to Lower Rose Creek must be mitigated in Lower Rose Creek.

Supporting and Enhancing Regional Recreational Connections

While reducing concrete channel in the watershed was one of the original tenets of the watershed Assessment, another was to preserve and enhance the recreational opportunities in the watershed. The proposed Alternatives parallel and/or cross the existing Rose Canyon bicycle path, and any impacts to the path users (including visual impacts and noise impacts) and the path itself should be included in the Draft SEIS/SEIR. Related to that, a key proposal of the Assessment is to connect the communities of Clairemont and University City to Mission Bay so that a pedestrian or cyclist could travel all the way to the bay without crossing a public street. Assessment Recommendation 2.5.3 addresses this with proposals to connect existing Class 1 bicycle paths through the watershed including along Lower Rose Creek.

As you know, the Coastal Conservancy has recently awarded a grant to the San Diego County Bicycle Coalition to refine the planning for this key trail connection that will also serve as a portion of the California Coastal Trail through this part of the county. The footprint for this trail connection parallels the footprint of the Mid Coast Project alignment through Lower Rose Creek. Preliminary analysis done for the Assessment found there is enough room in the corridor for both the Mid Coast Project and the new bicycle and pedestrian trail. However, it is critical that planning for both projects be coordinated and integrated.

We urge SANDAG to work closely with the San Diego Bicycle Coalition and the watershed team to coordinate its planning for the Mid Coast Project with the existing Rose Canyon bike path and the proposed Coastal Trail through the same corridor to help the Mid Coast Project better meet its own goals to increase the overall capacity of the transportation system in the study area, as cyclists and pedestrians can use the trail to reach the trolley and the trolley to reach the trail (and Mission Bay). Doing so also advances SANDAG's goals to reduce VMT and VHT in the corridor as the north/south route will provide a new, safe venue for bicycle commuters. Additionally, it helps SANDAG meet its Regional Policy Objectives to improve air quality and reduce greenhouse gas emissions. We urge SANDAG to work with the San Diego Bicycle Coalition and the watershed planning team to refine this proposed trail further and implement it as part of the implementation of the Mid Coast Project.

Creating Safe and Legal Railroad Crossings

Directly related to creating new regional recreational connections is the need to implement safe and legal rail crossings in the watershed. Assessment recommendation 2.5.5 addresses this and suggests alternative locations where crossings could occur. The current system of recreational users of the watershed constantly crossing the tracks is untenable, unsafe and

illegal. It is essential for public safety that SANDAG address this issue as part of the planning for the Mid Coast Project and the California Coastal Trail and implement safe legal crossings of the tracks as part of the Mid Coast Project. The Assessment recommends where crossings could occur; we urge SANDAG to work with the San Diego County Bicycle Coalition and the watershed planning team to refine these crossings further and implement them as part of the implementation of the Mid Coast.

Enhancing the User Experience in the Watershed

The Assessment proposes to enhance the watershed for people as well as animals. As a result of implementation of the Assessment, the watershed will become an even better place to recreate than it is today. Yet, the Mid Coast Project will have visual, noise and other impacts on animals as well as people, potentially undermining the quality of the user experience. We request the Draft SEIS/SEIR address this both in the context of the user experience in the watershed today, but also how the user experience could be enhanced as a result of implementation of the Mid Coast Project. Furthermore a key component to the user experience is the amount and variety of wildlife in the corridor. We therefore request that the impacts to wildlife viewing experiences both today and as a result of implementation of the mid Coast Project be addressed.

Cumulative Impacts

There are a variety of projects planned for the watershed at this time. The cumulative impacts of these proposed projects must be addressed by the Draft SEIS/SEIR. The projects include, but are not limited to: high speed rail; LOSSAN; the Regent's Road Bridge; Coastal Rail Trail; Wet Weather Intermittent Stream Discharge Study; City of San Diego storm drain maintenance; Highway 5 improvements and AMTRAK improvements. The Draft SEIS/SEIR must address the cumulative impacts associated with the construction, operation and long term maintenance of the Mid Coast Project as well as all other proposed projects in the watershed. The evaluation of cumulative impacts must include (but not be limited to) biology, hydrology, water quality, noise and vibration, wetlands, lighting, visual and aesthetic impacts, wildlife and ecosystems impacts (including sensitive, threatened and endangered species), recreation, and impacts on Marion Bear Memorial Park, Rose Canyon Open Space Park, Lower Rose Creek and the MSCP.

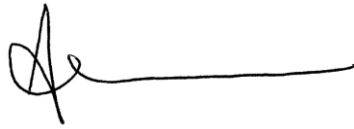
Making the Final Comparative Evaluation of Alternatives and the Draft SEIS/SEIR More User Friendly

One of the difficulties in responding to this scoping is that the level of detail provided in the Draft Comparative Evaluation of Alternatives is not sufficient to determine the footprint of the impacts. We request that the Final Comparative Evaluation of Alternatives and the Draft SEIS/SEIR both include a high quality aerial, such as a Google Map, at a scale of at least 1:200 (preferably 1:100 and 1:200) for each alignment evaluated so that the public can review each section of the route in greater detail.

An additional public benefit would be to provide this same information on the project website as an overlay on Google Earth showing the area of impact from the centerline of each rail line, to the right of way and any additional limits of the impact, including construction impacts. Providing this information to the public will help SANDAG in the short and long run as the public will be able to better understand the specific impacts on the ground associated with the Mid Coast Project and will be able to better direct their comments.

We appreciate SANDAG's consideration of our comments and its attention to date to the watershed.

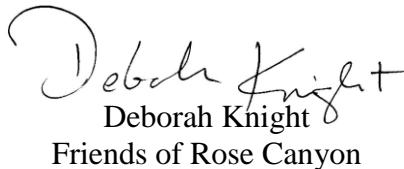
Sincerely,



Ann Van Leer
Convener for San Diego Earthworks



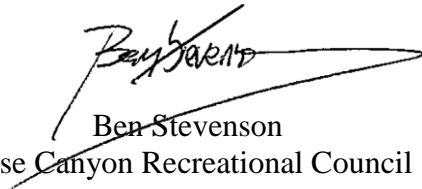
Karin Zirk
Friends of Rose Creek



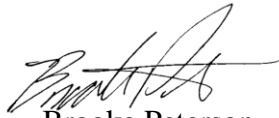
Deborah Knight
Friends of Rose Canyon



Brent Banta
Marian Bear Park Recreation Council



Ben Stevenson
Rose Canyon Recreational Council



Brooke Peterson
Clairemont Mesa Planning Group



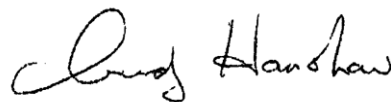
Kathy Keehan
San Diego County Bicycle Coalition



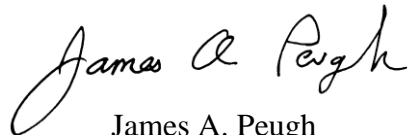
Carroll Zahn
Nobel Recreation Council



Judith A. Swink
Mission Bay Park Committee



Andy Hanshaw
Discover Pacific Beach



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