



July 16, 2013

Ms. Leslie Blanda
SANDAG
401 B Street, #800
San Diego, CA 92101

Dear Ms. Blanda,

The San Diego County Bicycle Coalition (SDCBC) is pleased to present these comments on the draft Mid-Coast Corridor Transit Project (Mid-Coast) EIR/EIS. We have a strong interest in rail improvements proposed in the Rose Creek area because of the adjacent and heavily utilized Rose Canyon Bicycle Path, as well as the lack of non-motorized connectivity between the upper Rose Creek Watershed and University City/Clairemont areas to Mission Bay Park and beyond.

Enhancing *East/West* Bicycle and Pedestrian Movement via a bridge at the Confluence:

SDCBC appreciates what SANDAG is doing to address impacts to north/south bicycle and pedestrian movement associated with the construction of the Mid-Coast. We commend SANDAG for acknowledging the important role the Rose Canyon Bicycle Path plays in promoting north/south bicycle and pedestrian use and appreciate the agency's attention to minimizing impacts to both during the construction and implementation phases. However, we are concerned that Mid-Coast will significantly and permanently curtail *east/west* bicycle and pedestrian movement from University City and Clairemont to Mission Bay Park. The draft document is inadequate in that regard.

Currently, pedestrians and cyclists walk or ride from both Rose and San Clemente canyons, crossing the railroad tracks and Rose Creek at the confluence (beneath the I-5/WR-52 interchange) onto the existing Rose Canyon Bicycle Path. We acknowledge that this current practice is illegal and unsafe, but people still do it as there is no other alternative to get from the west end of both canyons to the bike path. Mid-Coast will eliminate that option by fencing the route.

We appreciate that federal safety regulations have dictated the need to add fencing along the Mid-Coast corridor, but the EIR/EIS must address this as a key impact to circulation and provide for meaningful mitigation to address the impact. We suggest that SANDAG construct a bridge at the confluence to carry both cyclists and pedestrians over the tracks and creek to provide better access to the canyon trail system and to Mission Bay Park. We understand that SANDAG is currently planning trail connections across the creek further south and strongly support this effort. However, if those proposed connections are built they do not negate the need for a bridge at the confluence. Both connections are critically needed if we are going to become a bicycle and pedestrian-friendly community because of the watershed's topography.

SDCBC conducted surveys of bicyclists and pedestrians on the Rose Canyon Bicycle Path in 2012, asking trail users their opinion on the need for an east/west connection at the confluence. 115 trail users responded favorably, many enthusiastically so. None responded negatively. Improvements to the rail corridor associated with Mid-Coast present an opportunity for the development of additional non-motorized access to address existing transportation system deficiencies.

The State Coastal Conservancy has provided a grant to the SDCBC to complete technical studies, design, and stakeholder coordination for the Rose Creek Watershed Trail Connections Project (Connections Project). The project is designing a new bridge and Class I multi-use trail to connect the existing Rose Canyon Bicycle Path and improve railroad and creek crossings. These proposed key trail connections would greatly enhance public access from the upper Rose Creek Watershed and University City and Clairemont areas to Mission Bay Park and the beaches. This project is intended to provide a safe and convenient grade-separated track crossing within a corridor that has an identified need. The bridge connection was identified as a priority in the *Rose Creek Watershed Opportunities Assessment*, a comprehensive analysis of opportunities and recommendations to enhance the natural, cultural, public safety, and recreation attributes of the Rose Creek Watershed (available at [www.rosecreekwatershed.org/docs/opp assessment](http://www.rosecreekwatershed.org/docs/opp_assessment)).

Per Section 3.4.3, Bicycle and Pedestrian System Impacts, of the Draft SEIS-SEIR, "Bicycle and Pedestrian Facilities play a key role in providing access to and from transit stations. Further, these facilities are a component of the accessibility goals established by SANDAG and the city. Accordingly, various SANDAG and city plans seek to expand the pedestrian and bicycle system between 2010 and 2030 to serve the needs of a growing population and to encourage travel by modes other than the automobile."

With the identified pedestrian track-crossing safety concerns, and an understanding of regional goals for enhanced accessibility, we request that a grade-separated bicycle/pedestrian bridge track-crossing and adjacent trail improvements be constructed concurrently with rail improvements in the Rose Creek area. Further, we request that the cost to construct the bridge be incorporated into the overall cost of Mid-Coast. This bridge will benefit Mid-Coast by incorporating corridor enhancements for non-motorized users, solving an identified and potentially escalating safety concern with track crossings by pedestrians and cyclists, and helping to meet accessibility goals established by SANDAG and the City of San Diego.

Enhancing Bicycle and Pedestrian Safety via Realignment of the Rose Canyon Bicycle Path:

The Rose Canyon Bicycle Path is heavily used by commuter and recreational cyclists and pedestrians. Since September 2012, daily bicycle volumes are counted via a counting station installed at the south end of the Rose Canyon Bicycle Path near the end of Santa Fe Street. Count volumes recorded in 2012 indicated an average daily volume of about 462 users, with a peak daily volume of about 700 users. It's important to keep in mind that pedestrians also use the path and more would use it if it was made more pedestrian-friendly and better connected the communities of University City and Clairemont to Mission Bay and the beaches as described above.

The realignment of the Rose Canyon Bicycle Path proposed for the Build Alternative appears to be an acceptable alignment and profile that will not reduce path operations or safety. The realignment appears to provide a better facility than the existing path in several areas due to curve straightening. There is an area of the existing bicycle path that currently is a safety concern for both bicyclists and

pedestrians due to small-radius reversing horizontal curves adjacent to the proposed realigned bicycle path (near 'SB Line' Station 525+00). However, there are no improvements proposed for the reversing curves. We request that the area of the existing Rose Canyon Bicycle Path with the reversing horizontal curves near the proposed bicycle path realignment be improved with Mid-Coast to enhance line of sight for trail users.

The proposed 12' minimum paved width for the realigned bicycle path would meet design standards for a Class I bicycle facility. However, there are several areas where a brow ditch for drainage is proposed immediately adjacent the paved bicycle path. Also, there are areas proposed where a 2:1 embankment slope begins immediately at the paved edge of the bicycle path. We suggest that brow ditches be located as far as possible from the bicycle path, and that a 2' graded bench be provided between the paved bicycle path surface and any adjacent slopes for the benefit of safety maintenance.

Mitigation Measure TCON1 would require informational signs and a detour route along local streets and pathways to be provided during any short-term, intermittent bicycle path closures. Due to the potentially limited and/or highly circuitous detour routes available for the Rose Canyon Bicycle Path we request that detour routes be defined during the current environmental phase of the project to allow the appropriate planning with the accompanying opportunity for public input.

Thank you for the opportunity to comment. Please feel free to contact us with any questions on these comments.

Sincerely,



Andy Hanshaw

Cc: County Supervisor Ron Roberts
San Diego Mayor Bob Filner
San Diego City District 1 Councilmember Sherri Lightner
San Diego City District 2 Councilmember Kevin Faulconer
San Diego City District 6 Councilmember Lorie Zapf