

## **CALIFORNIA COASTAL COMMISSION**

45 FREMONT, SUITE 2000  
SAN FRANCISCO, CA 94105-2219  
VOICE (415) 904-5200  
FAX (415) 904-5400  
TDD (415) 597-5885

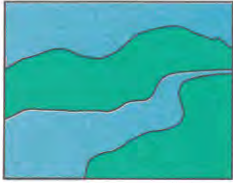


# **W 14a**

**CONSISTENCY CERTIFICATION CC-0001-17 (SANDAG)**

**JUNE 7, 2017**

**CORRESPONDENCE**



San Dieguito River Park  
Joint Powers Authority  
18372 Sycamore Creek Road  
Escondido, CA 92025  
(858) 674-2270 Fax (858) 674-2280  
www.sdrp.org

Item W14a  
CC-0001-17  
Kevin McKernan

May 31, 2017

Larry Simon  
Coastal Program Analyst  
California Coastal Commission  
45 Freemont Street  
Suite 2000  
San Francisco, CA 94105-2219

Subject: Consistency Certification CC-0001-17, Item W14a  
San Dieguito River Railroad Bridge Replacement, double-track extension, and  
Del Mar Fairgrounds special events rail passenger platform

Dear Mr. Simon and California Coastal Commissioners:

The San Dieguito River Park Joint Powers Authority (JPA) has been an active member of SANDAG's Technical Working Group (TWG) for this project that is now seeking your Consistency Certification. The JPA, over the course of its participation on the TWG, has voiced concern with regard to one issue that will determine the success of the San Dieguito River Park's Coast to Crest Trail to "reach the beach" - the western terminus of this regional public multi-use trail. The JPA has supported the proposed railroad bridge and platform project, however the project configuration as designed, as reiterated in our previous letters (three letters are enclosed) and in meetings with Coastal and SANDAG staff, will jeopardize the ability to complete the Coast to Crest Trail to the beach in Del Mar because it would not allow access under the north side of the proposed railroad double track and platform. This situation is also in direct conflict with the North Coast Corridor Public Works Plan that identifies this undercrossing as a Community Enhancement.

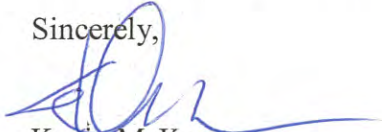
Contrary to what is stated on pages 10 and 42 of the Coastal staff report, our review of the 30% and 60% design plans for the project shows that the proposed new track, maintenance road, and special events platform infrastructure (stairs, ramps, etc.) will consume most of the public access easement along the east side of Stevens Creek required of the 22<sup>nd</sup> District Agricultural Association to accommodate the Coast to Crest Trail (see enclosed letter to CCC dated 7/18/14) effectively precluding the trail from proceeding west to the beach. As currently designed, this project would severely limit trail access along the east side of Stevens Creek to the proposed Stevens Creek culvert. According to the Coastal staff report, this new culvert would presumably accommodate access under the new double track to the west to the beach, and on page 42 states that the design and culvert would not "preclude" the trail. However, nowhere is this actually demonstrated and, in fact, trail access to the culvert appears to be effectively blocked by the project. No evidence is provided by SANDAG or Coastal staff that the proposed Stevens Creek "soft bottom" culvert could feasibly accommodate a multi-use trail. Thus, it cannot be concluded that the design of the proposed project will "not preclude" a future Coast to Crest Trail

undercrossing when no attempt has been made to demonstrate the ability to provide it. Evidence provided in the proposed design plans, in fact, show otherwise.

The JPA has alerted Coastal staff (local and headquarters) and SANDAG staff of this issue several times and have raised it repeatedly in SANDAG's TWG meetings and in separate meetings and conversations with SANDAG staff. The JPA acknowledges that the Coast to Crest Trail to the beach may be built by others (such as the JPA), but it is imperative that multi-use trail access be incorporated into the LOSSAN double track/platform project during this critical design phase and while approvals and permits are being issued. It must be demonstrated that a trail undercrossing can feasibly be accommodated, as required by the PWP, and the JPA is asking that the design plans be modified to show this.

The short notice for this Commission hearing did not allow time for JPA staff to bring this issue to the JPA Board for consideration; thus this letter represents that of JPA staff based on previous JPA Board actions on this issue. It is unfortunate that such a locally-important project be heard by your Commission at a venue at the far northern end of the state and not locally here in our region. We trust that you will seriously consider our request to require the proposed double track and platform project to accommodate the Coast to Crest Trail.

Sincerely,

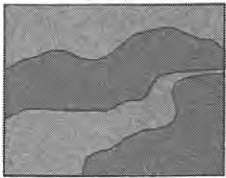


Kevin McKernan  
Executive Director

Cc: Gabriel Buhr, San Diego Coastal Staff  
City of Del Mar Council and staff  
Linda Culp, SANDAG Project Engineer

Attachments





San Dieguito River Valley  
Regional Open Space Park  
18372 Sycamore Creek Road  
Escondido, CA 92025  
(858) 674-2270 Fax (858) 674-2280  
www.sdrp.org

**JOINT POWERS AUTHORITY  
BOARD OF DIRECTORS**

Chair Jim Cunningham  
Poway City Council

Vice-Chair Lesa Heebner  
Solana Beach City Council

Don Mosier  
Del Mar City Council

Olga Diaz  
Escondido City Council

Sherri Lightner  
San Diego City Council

Mark Kersey  
San Diego City Council

Dave Roberts  
Supervisor, County of San Diego

Dianne Jacob  
Supervisor, County of San Diego

Tom Golich  
Citizens Advisory Committee

Becky Bartling, Ex Officio  
22nd District Agricultural Assoc.

Dick Bobertz  
Executive Director

May 17, 2013

Gary Gallegos  
Executive Director  
San Diego Association of Governments  
401 B Street, Suite 800  
San Diego, CA 92101

Subject: Comments on Draft North Coast Corridor Public Works Plan and  
Transportation and Resource Enhancement Program, March 2013

Dear Mr. Gallegos:

The JPA Board considered SANDAG's Draft North Coast Corridor Public Works Plan at their meeting of May 17, 2013. Although the JPA Board meeting schedule did not permit us to consider this document by the public review period deadline of April 29, 2013 our JPA staff reviewed the Draft PWP in detail and submitted a comment letter dated April 16, 2013 (attached). The JPA applauds the effort by SANDAG to incorporate major public access and transit amenities into the planning for both the I-5 NCC project and the LOSSAN project. However, as stated in the JPA's letter, the lack of specificity in the PWP regarding trail crossings under the planned San Dieguito double-tracked railroad line is of great concern considering the existing tracks represent the final impediment to realizing the JPA's goal of completing the Coast to Crest Trail to the beach in Del Mar.

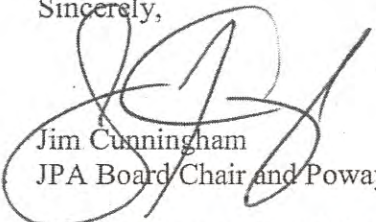
Significant local and state resources have gone into building the Coast to Crest Trail in the coastal area resulting in the recent completion of over two miles of trail along the San Dieguito Lagoon that now terminates at Jimmy Durante Boulevard, but will soon be completed west through the Fairgrounds. The JPA has been communicating with SANDAG staff and the San Dieguito Double Track design team from the beginning regarding the importance of and regional need to incorporate public trail crossings into the San Dieguito Rail Bridge to allow for public access across the railroad tracks to the beach in Del Mar. Specifically, a pedestrian undercrossing is needed under the new south railroad bridge abutment to address the issue of public safety as the public has been crossing the tracks at this location for many years, and a trail crossing north of the river is needed to provide access for the Coast to Crest Trail from the Fairgrounds west to the beach. Both of these proposed crossings are consistent with the findings in the JPA's Reach the Beach Trail Feasibility Study (February 2012).

Mr. Gallegos

Page 2

We urge SANDAG to provide the necessary details of how new rail crossings will be implemented including funding and project design so that they are incorporated into the project as it is being designed.

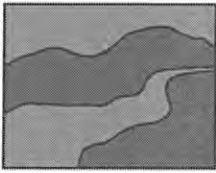
Sincerely,



Jim Cunningham

JPA Board Chair and Poway Councilmember

Cc: Bruce April and Shay Harrison, Caltrans  
Deanna Spehn, California Assemblymember Toni Atkins office  
Linda Culp, SANDAG  
Kathleen Garcia, City of Del Mar



San Dieguito River Park  
Joint Powers Authority  
18372 Sycamore Creek Road  
Escondido, CA 92025  
(858) 674-2270 Fax (858) 674-2280  
www.sdrp.org

**JOINT POWERS AUTHORITY  
BOARD OF DIRECTORS**

Chair Dave Roberts  
Supervisor, County of San Diego

Vice-Chair Don Mosier  
Del Mar City Council

Olga Diaz  
Escondido City Council

Jim Cunningham  
Poway City Council

Dave Zito  
Solana Beach City Council

Sherri Lightner  
San Diego City Council

Mark Kersey  
San Diego City Council

Dianne Jacob  
Supervisor, County of San Diego

Tom Golich  
Citizens Advisory Committee

Becky Bartling, Ex Officio  
22nd District Agricultural Assoc.

Dick Bobertz  
Executive Director

July 18, 2014

Heather Johnston  
California Coastal Commission  
45 Fremont Street  
Suite 2000  
San Francisco, CA 94105-2219

**Subject: Conservation Easement  
Del Mar Fairgrounds Consent Cease and Desist Order**

Dear Ms. Johnston:

It is our understanding that Section 3.6.C of the Consent Order requiring an offer to dedicate an easement of varying width along the western edge of the Del Mar Fairgrounds has not yet been executed. Although the JPA is the intended recipient of the easement as specified in the Consent Order (CO), we have not received information regarding the status of the easement two and a half years after approval of the CO. In fact, it has recently come to the JPA's attention that the easement may be seriously compromised.

The intent of this easement, per the Consent Order, is for conservation, restoration, and public access along Stevens Creek; however, its very purpose is at risk. First, we have learned that the metes and bounds legal description provided to Commission staff by the 22<sup>nd</sup> DAA does not match the language in the CO because it does not provide a continuous 8- to 25 foot-wide easement from "Point B to Point C" as required by the CO and as shown in Exhibit 2.

Secondly, we have learned through our involvement in the San Dieguito LOSSAN Double Track and Fairgrounds Special Events Platform projects, that SANDAG intends to place much of the Special Events Platform within the subject easement, which would essentially block the ability to route the Coast to Crest Trail along Stevens Creek within the easement as intended. It has been a long-standing adopted plan and goal to complete the western end of the Coast to Crest Trail to the beach and to utilize the easements provided along the Fairgrounds for the trail alignment. But, according to SANDAG staff, they have requested that the 22<sup>nd</sup> DAA include the Platform (access stairs and ramps and maintenance road) as a permitted use in the easement, which would consume most the easement making it no longer available for a trail without expanding the easement further into the Fairgrounds.

Although the JPA supports the Seasonal Platform in concept, we strongly object to a design that would block the ability to use the easement for its intended purpose and that would be in direct conflict with the Consent Order.

As the Commission considers the final NCC Public Works Plan/TREP at their meeting in August 2014, they must recognize that the Community Enhancement Project to construct a Coast to Crest Trail crossing at San Dieguito (DM#1) is seriously affected by these most recent revelations, which, if carried out as proposed, may block any practical construction of a public access trail through the area. We trust the Commission will abide by its Consent Order and preserve the intent of the public access easement and require that SANDAG develop a design that accommodates all uses and is consistent with the Consent Order. We look forward to resolving this matter with your staff.

Sincerely,

A handwritten signature in black ink that reads "Dave Roberts". The signature is written in a cursive, flowing style.

Dave Roberts  
JPA Board Chair

Cc: Linda Culp, Principal Planner, SANDAG  
Gabriel Buhr, Coastal Commission San Diego office  
Becky Bartling, 22<sup>nd</sup> DAA  
Del Mar City Council and Staff

Passed July 18, 2014 JPA Board Meeting:

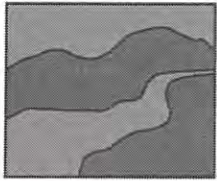
AYES: 5 (ROBERTS, MOSIER, VAUS, KERSEY, GOLICH)

NOES: 0

ABSTAIN: 1 (DIAZ)

ABSENT: 3 (ZITO, LIGHTNER, JACOB)





San Dieguito River Park  
Joint Powers Authority  
18372 Sycamore Creek Road  
Escondido, CA 92025  
(858) 674-2270 Fax (858) 674-2280  
www.sdrp.org

**JOINT POWERS AUTHORITY  
BOARD OF DIRECTORS**

Chair Dave Roberts  
Supervisor, County of San Diego

Vice-Chair Don Mosier  
Del Mar City Council

Olga Diaz  
Escondido City Council

Jim Cunningham  
Poway City Council

Dave Zito  
Solana Beach City Council

Sherri Lightner  
San Diego City Council

Mark Kersey  
San Diego City Council

Dianne Jacob  
Supervisor, County of San Diego

Tom Golich  
Citizens Advisory Committee

Becky Bartling, Ex Officio  
22nd District Agricultural Assoc.

Dick Bobertz  
Executive Director

July 18, 2014

California Coastal Commission and Staff  
San Diego District Office  
7575 Metropolitan Drive, Suite 103  
San Diego, CA 92108

**Subject: Comments on North Coast Corridor Public Works  
Plan/Transportation and Resource Enhancement Program**

Dear Commissioners and Staff:

The San Dieguito River Park JPA is pleased to see the Coast to Crest Trail Crossing (DM#1) included as a Community Enhancement in the June 2014 NCC PWP/TREP and commends SANDAG, Caltrans, and the Coastal Commission for committing to a plan that will greatly enhance public access up and down the North San Diego coastline. We especially appreciate the integration of non-vehicular enhancements to encourage a multi-modal approach to solving San Diego's transportation needs. However, the JPA is concerned about what appears to be an inconsistency between the PWP/TREP and design of a specific project in the plan.

According to the PWP/TREP phasing plan, the San Dieguito Double Track, Lagoon Bridge Replacement, and Del Mar Fairgrounds Special Event Platform is scheduled in the "Initial-Term" phase (years 2021-2030) and will include a Coast to Crest Trail LOSSAN Crossing as a Community Enhancement in that phase. The Coast to Crest Trail Crossing at San Dieguito is a critical piece of the PWP/TREP public access package as the railroad presents the final major impediment to bringing this regional public trail to the beach. However, the JPA is concerned that design of the LOSSAN and Platform projects is rapidly proceeding yet does not include a Coast to Crest Trail crossing and project design may, in fact, *preclude* the crossing.

The JPA staff is on a technical working group established by SANDAG to review design of the LOSSAN San Dieguito double track and Platform projects. Although implementation of this project is not yet scheduled due to lack of funding, SANDAG and the Federal Railroad Administration are proceeding with engineering plans and NEPA environmental compliance. Of concern to the JPA is that detailed project engineering plans shared by SANDAG planners do not include a Coast to Crest Trail crossing, and, in fact, would block a feasible alignment within a public access easement on the Fairgrounds property reserved



for such a trail. This public access easement was included as part of a Consent Order issued to the 22<sup>nd</sup> District Agricultural Association by the Commission. In addition, the engineering plans show no trail undercrossing designed or accommodated across the rail line. The JPA is concerned that a detailed level of engineering has proceeded on this project in a way that directly conflicts with the intent and wording of the PWP/TREP to provide this trail crossing.

JPA staff will continue to work with SANDAG planners and Fairgrounds staff to resolve this issue. Commission staff has assured our staff that a trail crossing must be included in any final plans for the San Dieguito LOSSAN and Platform project and that the Commission would require it as part of their Federal Consistency Certification process. However, design of these three facilities in a constrained environmentally sensitive area is complex, which makes it imperative that this critical trail crossing be integrated into the LOSSAN and Platform plans now. Thus, we urge the Commission to send written direction to SANDAG that a Coast to Crest Trail Crossing must not just be considered "not precluded", but must be designed and implemented as part of their project.

We appreciate the extended public review period prior to your August 2014 hearing to consider the Final PWP/TREP. We urge you to adopt this important plan with the commitment to ensure the Coast to Crest Trail Crossing (DM#1) is implemented.

Sincerely,



Dave Roberts  
JPA Board Chair

Cc: Linda Culp, Principal Planner, SANDAG  
Charles 'Muggs' Stoll, Land Use and Transportation Department Director, SANDAG  
Becky Bartling, 22<sup>nd</sup> DAA  
Del Mar City Council and Staff

Passed July 18, 2014 JPA Board Meeting:

AYES: 5 (ROBERTS, MOSIER, VAUS, KERSEY, GOLICH)

NOES: 0

ABSTAIN: 1 (DIAZ)

ABSENT: 3 (ZITO, LIGHTNER, JACOB)



# City of Del Mar



June 1, 2017

Larry Simon  
Coastal Program Analyst  
California Coastal Commission  
45 Fremont Street  
Suite 2000  
San Francisco, CA 94105-2219

Subject: Consistency Certification CC-0001-17, Item W14a  
San Dieguito River Railroad Bridge Replacement, double-track extension, and  
Del Mar Fairgrounds special events rail passenger platform

Dear Mr. Simon and California Coastal Commissioners:

The City of Del Mar staff has been an active member of SANDAG's Technical Working Group (TWG) for the San Dieguito Double Track (SDDT) project that is now seeking your Consistency Certification. The City Council of Del Mar also established an Ad Hoc Committee of citizens to review the project and provide input. The Del Mar City Council, on numerous occasions, has provided comments to SANDAG during the process identifying concerns. While some of these concerns have been discussed during the 30% and 60% design process, we request that the resolution of these concerns become part of the project conditions for Consistency Certification approval in order to ensure their compliance in the future.

## **1. Special Events Platform at the Del Mar Fairgrounds**

The concern of the Special Events Platform remains with its proposed 1,000 foot length and its proximity to sensitive receptors, particularly nearby residents and the lagoon habitat. Del Mar maintains its position that a shorter platform of approximately 750 feet in length could meet most of the operational objectives AND minimize impacts on the lagoon and neighbors and is the desirable option.

Regardless of the platform length, The City of Del Mar is requesting that the California Coastal Commission minimize the impacts by conditioning the project's approval to include measures to reduce noise by requiring:

- a. Operational controls that stop trains at the northern most end of the station
- b. Operational criteria to reduce noise from train operations at the station by restricting the use of horns, announcements, or other noises;
- c. Platform material selection that will reduce noise and vibration, including sound absorbing materials used for platform surfaces, railings, sound walls, etc.
- d. Access ramp design and construction materials that absorb and reduce sound.

The City of Del Mar is also requesting that the project's approval be conditioned to reduce potential impacts on the lagoon by requiring:

- e. Access ramp design and platform railings that prevent trash or patrons from entering the lagoon as well as reduce noise;
- f. Catchments to prevent any materials, debris, drainage, etc. from exiting the platform onto the lagoon area.
- g. Litter containers that are aesthetically pleasing and will blend with the surroundings, and that do not allow birds to remove trash;
- h. Prohibiting fixtures or surfaces that can serve as perches for raptors in order to protect nesting areas;
- i. Prohibiting overhead light fixtures that would spill light or glare into the lagoon;
- j. Pedestrian level light fixtures with glare and shielding controls to prevent light or glare outside of the platform or its ramps; and,
- k. Lighting should not be operated when platform is not in use.

## **2. Double Track Alignment**

There are design factors that mitigate adjacent neighborhood impacts that should also be incorporated into the project. These include:

- a. Visual screening of the raised track, especially at the approach to the bridge, including berms, planting, walls, fencing or other screening to lessen the impact of train lights and passengers views into existing residences.
- b. Mitigation of the noise and vibration from additional trains, train horns and operations on the existing residential community through sound walls, vibration dampening and operational mitigations.

## **3. Bridge Replacement**

The City of Del Mar concurs with the efforts to minimize the bridge height; maximize the span dimensions to limit piers; include the RiverPath Del Mar trail undercrossing (southern side of river), and utilize column designs that reduces the visual appearance. These items should be made as conditions of the approval. In addition, Del Mar requests that:

- a. Dampening materials to reduce noise and vibration impacts be incorporated into the bridge design;
- b. No lighting occurs on the bridge;
- c. The bridge height is maintained at the lowest possible elevation.

## **4. Accommodating the Western Terminus of the Coast to Crest Trail:**

As currently planned, the SDDT project occupies a large portion of the public access easement through the 22<sup>nd</sup> District Agricultural Association (Fairgrounds) land, severely compromising the San Dieguito River Park's Coast to Crest trail alignment and constraining any potential crossing under the tracks, preventing the trail from reaching the beach. No trail undercrossing is identified or designed in the SDDT project on the north side of the river and the potential crossing is relegated to a soft bottom drainage culvert. This is in direct conflict with the North Coast Corridor Public Works Plan that identifies this trail undercrossing as a Community Enhancement. The Consistency Certification should be conditioned with a design modification to show a multi-use trail access under the double track/platform.

June 1, 2017

California Coastal Commission Consistency Certification CC-0001-17

Page 3 of 3

We appreciate your serious consideration of Del Mar's request to condition the proposed double track and platform project approvals with the aforementioned conditions. However, the short notice for this Commission hearing did not allow time for staff to bring these issues to the full Del Mar City Council or their Ad Hoc Citizen's Committee for consideration. It is unfortunate that such a locally-important project be heard by the Coastal Commission in Humboldt County and not here in San Diego County. Del Mar requests that you continue this decision to a hearing in San Diego or Southern California to encourage citizens' participation.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott W. Huth". The signature is fluid and cursive, with the first name "Scott" being more prominent.

Scott W. Huth  
City Manager

Cc: City of Del Mar City Council  
Gabriel Buhr, San Diego Coastal Staff  
Linda Culp, SANDAG Project Engineer





©22nd D.A.A.

June 2, 2017

22ND DISTRICT AGRICULTURAL ASSOCIATION  
State of California

Larry Simon  
Coastal Program Analyst  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**Subject: Consistency Certification CC-0001-17, Item W14a: San Dieguito Double Track, Bridge Replacement and Seasonal Rail Platform project**

Mr. Simon,

I'm writing in support of Consistency Certification CC-0001-17 for the San Dieguito Double Track, Bridge Replacement and Seasonal Rail Platform. The 22<sup>nd</sup> District Agricultural Association (22<sup>nd</sup> DAA) has been an engaged member of the Technical Working Group for this project since its inception. As the state agency that owns/operates the Del Mar Fairgrounds and the nearly 3 million annual visitors, we are excited about the possibility of a seasonal rail platform at the Del Mar Fairgrounds; the inclusion of which would reduce vehicle trips and traffic, reduce parking demands, and reduce greenhouse gas emissions.

As stated in our previous letter of support for the project (see attached); the Del Mar Fairgrounds has included the potential for this much-needed rail improvement to the San Diego coastal rail corridor by including the special events platform in our Master Plan. Additionally, as stated in the attached letter, the 22<sup>nd</sup> DAA has lost much needed parking through the Consent Order agreed to by the 22<sup>nd</sup> DAA and the Coastal Commission with an additional 1,500 spaces potentially being lost in 2023. Adding alternative modes of access to the fairgrounds will serve to improve coastal access in the area, reduce traffic and reduce the demand for parking.

We applaud and appreciate the efforts of SANDAG and NCTD to replace the aging trestle bridge, double track this section of the rail line and add a seasonal rail platform at the fairgrounds. This project will provide a safe and reliable transit option, while reducing traffic congestion, vehicular greenhouse gas emissions, and help meet regional goals of enhancing transit service for San Diego County.

Thank you for opportunity to express our support for this much-needed alternative transportation project. We look forward to the fruition of years of careful planning, coordination and analysis.

Sincerely,

Russ Penniman  
President, Board of Directors  
22<sup>nd</sup> District Agricultural Association

CC: Tim Fennell, CEO/General Manager, 22<sup>nd</sup> DAA  
22<sup>nd</sup> DAA Board of Directors  
Linda Culp, Project Manager, SANDAG



©22nd D.A.A.

February 11, 2014

22ND DISTRICT AGRICULTURAL ASSOCIATION  
State of California

Mr. Gary L. Gallegos  
Executive Director  
San Diego Association of Governments  
401 B Street, Suite 800  
San Diego, CA 92101

Dear Mr. Gallegos:

On behalf of the 22<sup>nd</sup> District Agricultural Association, I am writing to express our support for the San Dieguito Double Track and Special Events Platform Project. This project includes much-needed rail improvements to the San Diego coastal rail corridor and a special events train platform on the west side of the Del Mar Fairgrounds.

Over the last 20 years, the 22<sup>nd</sup> District Agricultural Association has worked collaboratively with SANDAG and North County Transit District (NCTD) on various plans to construct a train stop near the fairgrounds to give our patrons a more convenient, direct, and environmentally-friendly transportation option for well-attended, regional events, such as the San Diego County Fair and the horse race season. The special events platform is a key mobility project that is included in our Fairgrounds Master Plan.

More than 3.5 million people visit the fairgrounds each year, and the 22<sup>nd</sup> District Agricultural Association has every confidence that our annual patron attendance will continue to increase. Despite the expected growth in attendance, we recently agreed to phase out one of the fairground's key overflow parking lots, meaning the loss of 1,250 parking spaces beginning in 2015. Additionally, the 22<sup>nd</sup> DAA has agreed to conduct studies that will help determine if an additional 1,500 parking spaces can be given up. The immediate loss of 1,250 spaces and the potential loss of an additional 1,500 spaces bolster the demand for alternative modes of access to the fairgrounds.

With many of our visitors traveling from downtown San Diego, Orange and Los Angeles Counties, or even further, we recognize that patrons would welcome utilizing transit as an alternative. We applaud SANDAG and NCTD's efforts to construct a special events platform at the fairgrounds, which will provide a safe and reliable transit option, while reducing traffic congestion, vehicular greenhouse gas emissions, and help to meet regional goals of enhancing transit service for the county.

Thank you, again, for your willingness to collaborate on this project. We are hopeful the San Dieguito Double Track and Special Events Platform Project receives full funding soon, and remain excited to witness it's completion.

Sincerely,

Frederick Schenk  
President of Board of Directors  
The 22<sup>nd</sup> District Agricultural Association

CC: Tim Fennel, CEO/General Manager of Del Mar Fairgrounds  
22<sup>nd</sup> District Agricultural Association Board of Directors  
SANDAG Board of Director Chair Jack Dale  
Linda Culp, Project Manager, SANDAG





401 B Street, Suite 800  
San Diego, CA 92101-4231  
(619) 699-1900  
Fax (619) 699-1905  
sandag.org

June 5, 2017

File Number 1239813

Ms. Dayna Bochco, Chair  
California Coastal Commission  
7575 Metropolitan Drive, Suite 103  
San Diego, CA 92108-4421

MEMBER AGENCIES

Cities of  
Carlsbad  
Chula Vista  
Coronado  
Del Mar  
El Cajon  
Encinitas  
Escondido  
Imperial Beach  
La Mesa  
Lemon Grove  
National City  
Oceanside  
Poway  
San Diego  
San Marcos  
Santee  
Solana Beach  
Vista  
and  
County of San Diego

ADVISORY MEMBERS

Imperial County  
California Department  
of Transportation  
Metropolitan  
Transit System  
North County  
Transit District  
United States  
Department of Defense  
San Diego  
Unified Port District  
San Diego County  
Water Authority  
Southern California  
Tribal Chairmen's Association  
Mexico

*A copy of this letter has been provided to California Coastal Commission Staff in accordance with the requirements of Public Resources Code, Sections 30319-30324*

Dear Chair Bochco and Members of the California Coastal Commission:

**SUBJECT: Consistency Certification CC-0001-17, Item W14a**

**HEARING DATE: June 7, 2017**

The San Diego Association of Governments (SANDAG) is writing to respond to the City of Del Mar comment letter dated June 1, 2017, on the Consistency Certification for the San Dieguito Double Track (SDDT), Railroad Bridge Replacement, and Special Events Platform Project (Project). The City of Del Mar Comment No. 4 also is included in the San Dieguito River Park Joint Powers Authority (JPA) comment letter dated May 31, 2017:

**CITY OF DEL MAR COMMENT**

**1. Special Events Platform at the Del Mar Fairgrounds**

The concern of the Project remains with its proposed 1,000 foot length and its proximity to sensitive receptors, particularly nearby residents and the lagoon habitat. The City of Del Mar maintains its position that a shorter platform of approximately 750 feet in length could meet most of the operational objectives and minimize impacts on the lagoon and neighbors and is the desirable option.

Regardless of the platform length, the City of Del Mar is requesting that the California Coastal Commission minimize the impacts by conditioning the Project's approval to include measures to reduce noise by requiring:

- a. Operational controls that stop trains at the northern most end of the station
- b. Operational criteria to reduce noise from train operations at the station by restricting the use of horns, announcements, or other noises
- c. Platform material selection that will reduce noise and vibration, including sound absorbing materials used for platform surfaces, railings, sound walls, etc.

- d. Access ramp design and construction materials that absorb and reduce sound

## **RESPONSE**

*Noise associated with operations of the special events platform would not result in adverse impacts. The Federal Transit Administration (FTA) screening distance for a train passenger platform is 200 feet for an adverse noise impact, and the closest residences to the southern end of the proposed platform would be approximately 435 feet away (south of the platform, across the San Dieguito River). Regardless, additional analysis was conducted to assess potential noise impacts resulting from noise generated by patrons using the proposed rail platforms. The FTA guidance states that in order for the platform passenger noise level to be less than adverse, it must be below the threshold of 50 dBA at the noise sensitive receiver, which is the lowest threshold outlined for noise sensitive uses in the guidelines. The modeled noise level at the nearest residence would be 47 dBA, which is below the 50 dBA threshold. Accordingly, this noise level would not be considered an impact pursuant to FTA guidance. Finally, noise only would be generated at the platform during special events with railroad service.*

*Platforms are typically designed with one mini-high ramp structure to accommodate accessible boarding for higher vehicles. The mini-high location then controls where a train with an accessible car can stop on the platform. The SDDT Special Events Platform is designed with mini-high ramps on each platform to allow shorter trains to stop all the way at the north end of the platform, as requested by the City of Del Mar.*

## **CITY OF DEL MAR COMMENT**

The City of Del Mar also is requesting that the Project's approval be conditioned to reduce potential impacts on the lagoon by requiring:

- e. Access ramp design and platform railings that prevent trash or patrons from entering the lagoon as well as reduce noise
- f. Catchments to prevent any materials, debris, drainage, etc., from exiting the platform onto the lagoon area
- g. Litter containers that are aesthetically pleasing and will blend with the surroundings, and that do not allow birds to remove trash
- h. Prohibition of fixtures or surfaces that can serve as perches for raptors in order to protect nesting areas
- i. Prohibition of overhead light fixtures that would spill light or glare into the lagoon
- j. Pedestrian-level light fixtures with glare and shielding controls to prevent light or glare outside of the platform or its ramps
- k. That lighting should not be operated when platform is not in use



**RESPONSE:**

- e. *The access ramps have 12-inch high curbs on each side. The railings will be mounted on top of the curbs and mesh fabric will be placed from the top rail to the top of curb to prevent trash from entering the lagoon. The metal railing and mesh will provide a barrier, while still maintaining a more open view compared to solid wall configuration.*
- f. *The platform and the ramps are designed with catch basins that will collect runoff as well as any debris or trash on the platform. All catch basins drain to a mechanical filter system before being discharged.*
- g. *Litter containers will be defined by the North County Transit District (NCTD) at a future time; however, litter collection within the Fairgrounds is anticipated within the passenger queueing area.*
- h. *Measures to prevent/discourage perching will include nixalite or equivalent.*
- i. *Pol-mounted light fixtures are limited to the platform area. The lighting design uses LED fixtures mounted on 14-foot high poles as opposed to the standard 30-foot high pole. Lights will be focused down onto the platform and away from the habitat to the fullest extent practicable.*
- j. *Ramp lighting is limited to curb-mounted lights. All lighting will be shielded and directed away from the lagoon.*
- k. *Lights will be used only during special events when the facility is in use.*

**CITY OF DEL MAR COMMENT**

**2. Double Track Alignment**

There are design factors that mitigate adjacent neighborhood impacts that also should be incorporated into the Project. These include:

- a. *Visual screening of the raised track, especially at the approach to the bridge, including berms, planting, walls, fencing, or other screening to lessen the impact of train lights and passengers views into existing residences.*
- b. *Mitigation of the noise and vibration from additional trains, train horns, and operations on the existing residential community through sound walls, vibration dampening, and operational mitigations.*

**RESPONSE:**

- a. *South of the river to 21st Street, homes to the west are visually shielded from rail operations by existing vegetation within the environmentally sensitive creek and heavy ornamental landscaping to the west of the creek. Ornamental landscaping along the private fence lines generally consists of tall trees and shrubs. The private fences and landscaping encroach into the railroad right-of-way by 40 feet to 60 feet. Some of the improvements are permitted with NCTD and some have been placed without permission. The Project will not remove any of the encroaching fences or landscaping that provide screening from rail operations. South of Camino Del Mar, the horizontal*

and vertical alignment of the railroad tracks will not change. The homes in this area are significantly below the elevation of the railroad and would not warrant additional screening.

- b. Noise - The proposed double track alignment south of the river will be constructed east of the existing rail alignment, away from the homes considered the most sensitive receptors. The centerline of the track nearest the homes will shift 30 feet east of the existing track centerline at the south bridge abutment, continue straight for 1,200 feet, and then curve back to the existing alignment at the Camino Del Mar undercrossing. Community concerns for noise was a major factor in selection of the east alignment even though the alignment was not preferred from a railroad operational standpoint. The new improvements will be constructed with continuously welded rail on concrete ties, which will reduce noise compared to the existing wood tie configuration. The switch equipment at Control Point (CP) Del Mar will be changed to quieter high-speed equipment and CP Crosby will be completely eliminated.

The FTA found operational noise impacts to residential receptors in the City of Del Mar would increase by up to 1 dBA at up to approximately one dozen single-family residences and one multi-family building along Grand Avenue, east of the tracks and south of the Camino Del Mar overcrossing. The increase is primarily due to the eastern track shifting 17 feet further to the east (closer to the residences). According to the FTA, because the baseline is above 70 decibels, the increase of one decibel would be considered a "Moderate Impact" not requiring mitigation. An increase of 1 dBA is barely perceptible to the average person. At other residences nearer to river, noise levels are predicted to be reduced by between 1 and 3 dBA because the track is shifting to the east, away from these residences. For this reason, no noise mitigation is required or proposed.

Vibration - For reasons like those described above for noise, increases in vibration levels would occur to residences located west of the realigned tracks. The modeled increase would be up to 5.3 Vdb, but would remain below FTA's threshold of 72 Vdb for frequent events. For this reason, no vibration mitigation is required or proposed.

## **CITY OF DEL MAR COMMENT**

### **3. Bridge Replacement**

The City of Del Mar concurs with the efforts to minimize the bridge height; maximize the span dimensions to limit piers; include the River Path Del Mar trail undercrossing (southern side of river); and utilize column designs that reduces the visual appearance. These items should be made as conditions of the approval. In addition, the City of Del Mar requests that:

- a. Dampening materials to reduce noise and vibration impacts be incorporated into the bridge design
- b. No lighting occurs on the bridge
- c. The bridge height is maintained at the lowest possible elevation

### **RESPONSE:**

The 60 percent design drawing submitted to the California Coastal Commission and that serve as the basis of the Environmental Assessment/Finding of No Significant Impact prepared by the FTA minimizing the bridge height; maximizing the span dimensions to limit piers, including the River Path

*Del Mar trail undercrossing (southern side of river); and utilizing column designs that reduces the visual appearance, are all elements of the project design upon which the Consistency Certification is based. No further action is required.*

- a. The Project incorporates a ballasted deck bridge. Railroad ballast (rock) is a noise and vibration reducing measure. The bridge structure is reinforced concrete and will be subject to less vibration than the existing wood trestle.*
- b. No lighting is provided on the current bridge, proposed bridge, or on any of the bridges SANDAG has replaced.*
- c. The bridge height has been set to accommodate the 100-year storm event, including predicted sea level rise effects through the end of the century. Raising the bridge would unnecessarily increase cost, so the planned bridge height will be maintained at the lowest possible elevation.*

#### **CITY OF DEL MAR COMMENT**

#### **4. Accommodating the Western Terminus of the Coast to Crest Trail:**

As currently planned, the SDDT Project occupies a large portion of the public access easement through the 22nd District Agricultural Association (Fairgrounds) land, severely compromising the San Dieguito River Park's Coast to Crest Trail alignment and constraining any potential crossing under the tracks, preventing the trail from reaching the beach. No trail undercrossing is identified or designed in the SDDT Project on the north side of the river and the potential crossing is relegated to a soft bottom drainage culvert. This is in direct conflict with the North Coast Corridor Public Works Plan that identifies this trail undercrossing as a Community Enhancement. The Consistency Certification should be conditioned with a design modification to show a multi-use trail access under the double track/platform.

#### **RESPONSE:**

*SANDAG agreed very early in this project that coastal access would be an important component. We formed a Technical Working Group of cities and agencies and held community meetings and city council updates in order to better understand this and other community issues. We have incorporated coastal access in the Project by including a special events platform that will enhance coastal access by giving additional travel choices to a major coastal destination. We have incorporated a safe and legal pedestrian undercrossing along the south side of the San Dieguito River as part of this Project, which is included as one alternative in the JPA's Reach the Beach Trail Segment of the Coast to Crest Trail Feasibility Study, February 2012. We have designed the Project not to preclude the northern crossing alternative, as shown in the February 2012 study.*

*There are no access easements dedicated on the Fairgrounds along the common boundary with NCTD. The project design is flexible enough to not preclude construction of the Coast to Crest Trail, allowing the trail to reach the beach. The bridge and platform design provide adequate vertical clearance for a trail crossing under the tracks at the south end of the platform and at the north end of the platform. In addition, the culvert crossing for Stevens Creek was changed to a soft bottom reinforced concrete arch structure with horizontal and vertical clearance appropriate for a trail crossing.*

*While it is true that the trail is identified in the North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP) as a Community Enhancement, the Project is not in direct conflict with the plan. Section 4.4.5.2 City of Del Mar section of the plan states:*

DM#1 Coast to Crest Trail LOSSAN Crossing: Construct a pedestrian crossing of the LOSSAN rail corridor at the western end of the Coast to Crest Trail, a 55-mile east-west recreational corridor connecting Del Mar with Volcan Mountain near Julian. As described in Section 4.4.3, the partially completed trail is a major feature of the San Dieguito River Park. The crossing **may** be incorporated into the adjacent SDDT and Platform Project (Section 4.1.1). This project does not currently have identified funding. **(emphasis added)**

*Furthermore, Table 4-1: LOSSAN Rail Corridor Projects in the North Coast Corridor (in Section 4.0 Scope of Planned Improvements) does not list a rail undercrossing as part of the Project. (The table lists crossings where they are planned for the other LOSSAN projects.)*

In conclusion, this Project will be an important asset for coastal access, will provide a direct alternative to driving to a major coastal destination, will have transportation and environmental benefits, and is consistent with the PWP/TREP. We look forward to the hearing on this Project and thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles Stoll', with a stylized, elongated flourish extending to the right.

CHARLES "MUGGS" STOLL

Director of Land Use and Transportation Planning

MST/LCU/mmo



Item W14a  
Wm Michalsky  
CONCERNS

CALIFORNIA COASTAL COMMISSION  
June 7, 2017 meeting

Item W14a  
CC-0001-17 (San Diego Association of Governments)  
San Dieguito River railroad bridge replacement

Three major elements in the SANDAG application:

Double Tracking – minor concerns  
Trestle Replacement – minor concerns  
Fairgrounds Special Events Platform – major concerns

These concerns were shared with SANDAG in 2013

**Double Tracking**

- Eastern Alignment is positive
  - Protects the Lagoon
  - Stevens Creek is relocated
- Unresolved items
  - Noise abatement
  - Vibration
  - Visual issues

**Bridge Replacement**

- Replacement and Lengthened spans are positive for the Lagoon
- Unresolved items
  - Noise impacts of Design
  - Height reduction if concurrent with Camino Del Mar Bridge replacement

**Special Events Platform**

- Unresolved items
  - Length of Platform
  - Definition of Special Events and Usage limits
  - Noise from arriving/standing/departing trains
  - Noise from arriving/standing/departing passengers
  - Lighting
  - Litter impacts on Lagoon
  - Services and Amenities

**Items that should be considered:**

Ridership data needs vetting

An adequate, modern rail station exist one mile north in Solana Beach; use hybrid buses

Shorter Platform length – 1000' is considerably longer than needed

- A 600' Platform would serve 8 passenger cars, typical consist is 6 passenger cars on LOSSAN
- The Lagoon is sensitive habitat and has had considerable restoration activity

Quiet zone design to mitigate train horn, dwell impacts and amplified sound systems

Dark Sky lighting to minimize impacts on the Lagoon and adjacent homes

No ticket sales from the Platform

Locate services and amenities at base to isolate noise and other impacts

Two underpasses

- North for Coast to Crest Trail
- South for River Path Del Mar

Evaluation of all mitigation

Thank you,

Wm Michalsky

Resident

Del Mar, California