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Th16a

ADDENDUM

DATE: **March 13, 2024**

TO: **Coastal Commissioners and Interested Parties**

FROM: **Statewide Transportation Program / San Diego District Staff**

SUBJECT: **ADDENDUM TO ITEM Th16a, CDP 6-22-0196 (San Diego El Camino Real Bridge/Road Replacement) FOR THE COMMISSION MEETING OF Thursday, March 14, 2024**

The purpose of this addendum is to respond to a public comment, and to make minor corrections and additions to several of the findings. Commission staff recommends changes to the February 7, 2024 staff report findings to correct two exhibits, add additional information about the project background, clarify the purpose and need of the project, add additional information to the public access and recreation findings, add additional information to the biological resources findings and to clarify the alternatives analysis and conflict resolution, and finally to add additional information about the proposed project's potential impacts on vehicle miles traveled and greenhouse gas emissions. Language to be added to the staff report is shown in underlined text, and language to be deleted is identified by ~~strikeout~~.

A. On page 5 of the staff report, exhibits 3 and 4 shall be replaced with modified exhibits:

EXHIBITS

Exhibit 1- Project Vicinity Map
Exhibit 2- Project Location Map
Exhibit 3- Proposed Roadway Rendering
Exhibit 4- Proposed Bridge Rendering
Exhibit 5- W-19 Map
Exhibit 6- Coastal Zone Boundary Relocation Map

B. On page 16 of the staff report, the project background shall be modified as follows:

The existing bridge spanning the San Dieguito River is structurally deficient and impedes storm flows, causing flooding during medium-high flow events. The bridge piles are relatively shallow and buried in sediments that could fail in an earthquake due to liquefaction, making the bridge seismically unsound. The existing roadway has one lane in each direction and operates at a Level of Service of F, which represents the most dysfunctional operational level. This scenic coastal roadway is heavily used by vehicles and cyclists alike. With no median nor designated bike lanes, and non-standard shoulders or sidewalks, vehicles currently dangerously cross over the centerline to navigate around cyclists and pedestrians. The City of San Diego Community Plan calls for a modernized four-lane roadway, to resolve seismic and flooding deficiencies, to improve safety by reducing vehicle-cyclist/pedestrian conflicts, and to alleviate chronic traffic congestion.

The City circulated a Draft Environmental Impact Report (EIR) in 2006, but it was not certified. The City conducted an extensive and lengthy outreach effort to the public and resource agencies for several years following the close of the 2006 EIR comment period. Based on that effort, including early coordination with Coastal Commission staff, changes were made to the alternatives and the proposed mitigation plan. In order to provide a meaningful opportunity for the public to comment on these changes, the entire EIR was recirculated for public review in 2015. During the public review period, letters of comment were received from agencies, organizations, and individuals. Any corrections, deletions, or revisions to the Recirculated Draft EIR were incorporated into the Final Recirculated Environmental Impact Report (FEIR) for the City of San Diego El Camino Real Bridge/Road Widening Project (SCH #1999071104/Project, No. 2982). The Commission received a CDP Application on March 11, 2022. The City then suspended the Commission review due to the need to recertify the outdated FEIR. On December 14, 2023, the Commission received a FEIR Addendum and reinitiated the review of the CDP application.

As a result of a multi-year and multi-agency advanced mitigation planning effort, in 2014, the mitigation for the subject project was identified, planned, funded, and is currently under construction in advance of the project related habitat impacts. Assembly Bill 468 required SANDAG to dedicate a portion of the TransNet Regional Habitat Conservation Fund for acquiring, managing and monitoring regional habitat activities for the North Coast Corridor (NCC) Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP's) and required that mitigation for identified transportation-project impacts be described with sufficient detail. The PWP/TREP's Resource Enhancement Mitigation Program (REMP) was prepared in close coordination with representatives of the Coastal Commission, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, U.S. Environmental Protection Agency, U.S.

Army Corps of Engineers, Regional Water Quality Control Board, and other resource and regulatory agencies. The program identified a package of natural resource establishment, restoration, and preservation, and enhancement opportunities to mitigate potential resource impacts caused by the implementation of the NCC mobility and community enhancement projects. The mitigation for the subject project was included in the REMP, which was approved along with the PWP/TREP by the Commission in 2014. The subject mitigation was authorized by CDP No. 6-20-0160 in 2021 and completed in 2023 and it provides conservation in perpetuity at the San Dieguito Lagoon W-19 Mitigation Site.

C. On page 20 of the staff report, the public access and recreation findings shall be modified as follows:

The El Camino Real roadway links the public to shoreline access in the northern area of the City of San Diego. The only nearby north-south coastal access alternatives are Camino Del Mar, two miles west of the subject location; Jimmy Durante Blvd, 1.5 miles west, and Interstate 5, 1.25 miles west, all of which are also frequently congested. The subject project will improve the intersection of El Camino Real and Via de la Valle, which provides a major east-to-west accessway, and is the only major coastal access route between State Routes 78 and 56. The applicant estimated that avoiding this stretch requires seven miles of extra driving.[1] The subject project will provide public access benefits to coastal residents and visitors by improving local traffic circulation, as well as constructing sidewalks and bicycle lanes to support multimodal transportation.

Due to the lack of a shoulder, bike lane, or sidewalks on the existing two-lane bridge, cyclists share the road with motorists, creating unsafe conditions when motorists pass cyclists by swerving into oncoming traffic. The proposed bike lanes will be separated from traffic by flexible delineators, increasing cyclist safety. This method of separating the bike lane from the vehicle travel lane was selected in order to allow for street sweeping equipment to periodically maintain the bike lane and to minimize the width of the proposed bridge and thereby minimize its impacts on wetlands and environmentally sensitive habitat areas.

D. On page 25 of the staff report, the biological resources findings shall be modified as follows:

[1] Section 5.1 of the EIR states that an "alternative location could involve diverting traffic around this segment of El Camino Real so that the road capacity increase would not be necessary… This alternative would represent an approximately 7-mile detour for through traffic on El Camino Real, and could require widening portions of three roadways in Fairbanks Ranch."

The Commission has determined that the fill for certain coastal roadway safety improvement projects that ~~did not increase vehicular capacity could be considered~~ provide an "incidental public service" pursuant to the requirements of Coastal Act Section 30233(a)(4). These actions have included road widening, road realignments, and bridge replacements (CDPs 4-21-0182, 1-18-1078, 2-15-1354, 3-19-1199, 3-22-0165).

This roadway widening is allowable in this case as no other feasible alternative exists that would meet the project objectives. El Camino Real south of San Dieguito Road is currently constructed and functions as a four lane major roadway. Currently, the northbound traffic experiences a bottleneck when reaching San Dieguito Road due to capacity constraints. This in turn increases the amount of time vehicles spend idling and emitting pollutants when transiting the area due to limited east-west routes that connect the communities north and south of the San Dieguito River to the regional access points at Interstate 5. An alternate route to El Camino Real requires a seven mile detour east across the following 2-lane collector roads: east on San Dieguito Rd, north on El Apajo, west on Calzada Del Bosque, and south on Via De La Valle. This project will provide more direct access to the adjacent communities, thereby alleviating congestion along the alternate routes. With the exception of the bridge and bridge abutments, the 0.45-mile realignment goes through already developed areas (south of the San Dieguito River: Fairbanks Golf Course and utility company access road; north of the River: Polo Fields parking).

Furthermore, the widening of the subject roadway segment from a two-lane collector to a four-lane major roadway is in accordance with the approved community plan circulation element (See City of San Diego Fairbanks Country Club Specific & Via de la Valle Specific Plans). The current roadway capacity and conditions do not support existing and future land use intensities and demand. As a result, the area experiences potential increase in greenhouse gas emissions and vehicle miles traveled due to diverted trips caused by the circulation network's inability to meet present demand. The technical studies (See FEIR Project No. 2982, Transportation Analysis for El Camino Real Road and Bridge Widening Project) prepared to assess the traffic flows within the vicinity of the project determined that the roadway segment is functionally obsolete with a LOS F rating. The Applicant conducted a traffic study, analyzed traffic flows, and met with area stakeholders, including community organizations and local businesses, to address this deficiency. Stakeholder feedback pointed to the present roadway capacity's inability to accommodate local high traffic volume demand caused by weekend trips to the coast and special events held at the nearby polo fields, fairgrounds, racetrack, or the golf course.

Therefore, the wetland impacts would result from safety and public access improvements within the existing roadway corridor, replacement of a functionally obsolete bridge with a new bridge built to current design and safety standards with the

capacity to convey 100-year storm event flows, construction of a roadway median to separate oncoming traffic, and provision or multimodal public access infrastructure. First, the proposed fill placement is being undertaken by a public agency to serve the public, and therefore, has a public service purpose. Secondly, the public safety purpose is incidental to the primary transportation purpose of the existing bridge. Third, although the subject roadway will be expanded from two to four lanes, the project connects to an existing two-lane roadway to the north, El Camino Real already functions as a four-lane roadway south of the project area and the roadway capacity in the area will not increase, and the improvements do not expand the roadway to areas not already served by the existing system. Although the applicant states that traffic in the corridor is likely to increase as the population of the region continues to grow, the project is not a roadway expansion intended to accommodate future traffic of new development projects in the area. Finally, the proposed project will result in a smaller footprint in the wetlands and ESHA than the existing bridge. Given that the design of the project is driven by safety needs, combined with the fact that the subject widening ties into an existing two-lane road to the north, the Commission finds that the proposed project would not increase overall roadway capacity and the fill is for an incidental public service purpose necessary to safely maintain existing capacity.

Therefore, the Commission finds here that for the reasons discussed above, the wetland fill for the proposed project is for an incidental public service purpose, and thus, is an allowable use pursuant to Section 30233(a)(4) of the Coastal Act.

Alternatives Analysis

For projects involving diking, dredging, or filling of wetlands, the Commission must ensure that the proposed project has no feasible less environmentally damaging alternative, consistent with Section 30233 of the Coastal Act. Coastal Act Section 30108 defines “feasible” as “…capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors.” Commission staff reviewed the exhaustive analysis in the City’s Final Environmental Impact Report (FEIR), including 420 pages of alternatives analysis. Eight project alternatives were analyzed in the FEIR before resulting in the City’s adoption of ~~promoting~~ the Eastern Alignment Alternative, the subject project design, as the preferred alternative. These alternatives include (a) the “no project” alternative, and (b) several alternatives that would involve different approaches to realigning/widening the roadway, replacing the bridge, reconfiguring the Via de la Valle intersection, accessing businesses, and providing multimodal access as summarized below. The

City analyzed a reasonable range of alternatives, which is all that is required.[2] Commission staff in turn used the City's analysis to affirm that there is no feasible less environmentally damaging alternative to the proposed project, where the project ensures feasible mitigation measures to minimize adverse environmental effects.

Specifically, it is not necessary to explore scenarios that are infeasible.[3] Beyond the "bicycle safety" alternative described below, other two-lane alternatives were not analyzed because a two-lane alternative was determined to be inconsistent with the project objective to address the level of service of F on the existing roadway, the two-lane alternative would not have improved traffic operational conditions to the level needed to safely satisfy the project's purpose and need, and the two-lane alternative was determined to be inconsistent with community plans for the area.

E. On page 27 of the staff report, the biological resources findings shall be modified as follows:

Bicycle Safety Alternative: This alternative included a narrow roadway cross section with an alignment shifted west, two travel lanes, bicycle lanes and a raised central median. This alternative would not provide pedestrian walkways, landscaping, or additional travel lanes to reduce chronic congestion. This alternative would avoid impacts to the wetlands in the drainage ditch parallel to the eastern edge of El Camino Real, identical to the Road Capacity Alternative. An elevated multi-use trail undercrossing would be provided under the north bridge abutment. This alternative would permanently impact 1.28 acres of wetlands, less than the proposed project's 3.33 acres of wetland impacts. However, similar to the Road Capacity Alternative, this alternative would have greater impacts to sensitive wildlife than the preferred alternative because bridge construction would span three bird breeding seasons versus one. In addition, this alternative would generate the most significant and unmitigable impacts to

[2] CEQA Guidelines, Section 15126.6 (Cal. Code of Regs., tit. 14) requires an EIR to describe a "range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

[3] An EIR need not examine "alternatives that are so speculative, contrary to law, or economically catastrophic as to exceed the realm of feasibility." [citation omitted]…. Both the California and the federal courts have further declared that '[t]he statutory requirements for consideration of alternatives must be judged against a rule of reason.' " [citation omitted]. We uphold an agency's selection of alternatives unless it is "manifestly unreasonable", or inclusion of an alternative does not "contribute to a reasonable range of alternatives." *Bay Area Citizens v. Ass'n of Bay Area Governments* (2016) 248 Cal. App. 4th 966, 1018.

traffic and circulation and would generate the most severe impacts to existing traffic during the two-year construction period. Finally, t~~T~~his alternative would ~~not~~ improve ~~coastal access through creating multimodal public access and improving~~ chronic coastal traffic congestion. For these reasons, the Commission finds that this project alternative is not a less environmentally damaging alternative to the proposed project.

F. On page 41 of the staff report, the coastal hazards, air quality and greenhouse gas emissions findings shall be modified as follows:

The primary purpose of the subject project is to improve public safety, update aging infrastructure and create multimodal public access, and the Applicant states that there will be a reduction in GHG emissions, vehicle miles traveled (VMT) and energy consumption due to improved traffic flow as a result of the lane additions. Congestion created by the existing roadway conditions generally do not prevent trips and outings, rather motorists adapt by taking alternate routes, including nearby Interstate-5 to the west and San Dieguito Road to the east.

Level of service was measured by the applicant based on traffic surveys conducted during weekday peak morning and afternoon timeframes because those were determined to be the heaviest volume periods for vehicle traffic. Level of Service at that time of day was determined to be F, the worst rating. Additional data to include weekends would not change the LOS of F, but anecdotally staff has noted that congestion occurs on the subject roadway on weekends when recreational travel to the coast is most likely to occur, and especially during local events at the Del Mar Fairgrounds, Del Mar Racetrack, adjacent Polo Fields and the Fairbanks Golf Course. By improving the Level of Service on this stretch of roadway, the proposed project will not induce demand, rather it is likely to decrease VMTs as motorists will no longer avoid the roadway, which is, on some trips, the more direct route. Additionally, the improvements will relieve vehicle idling caused by the current low Level of Service and congestion, thereby reducing GHGs.

Although roadway widening projects have the potential to “induce demand” for driving by making it easier to drive, the subject road, El Camino Real, is already four lanes south of San Dieguito Road. At present, northbound vehicles experience a bottleneck when reaching San Dieguito Road and the proposed project will only widen the remaining 0.45 mile segment that is currently two lanes from San Dieguito Road to Via de la Valle. Furthermore, in 2016, the Commission approved CDP 6-16-0807, which authorized Black Mountain Ranch LLC, a private developer, to widen Via de La Valle from two lanes to four lanes from El Camino Real to San Andreas Drive for approximately 5,470 linear feet.

Finally, t~~T~~he proposed bike lanes, sidewalks and ~~trial~~ trail connections with improve safe multimodal access, which may further reduce VMTs and GHG's. For the aforementioned reasons, GHG emissions and VMTs are not expected to increase as a result of the project relative to the existing conditions. Therefore, the project is consistent with Section 30253(c), 30253(d), and 30270.

G. On page 48 of the staff report, the conflict resolutions findings shall be modified as follows:

As detailed in the section on Public Access, the project offers considerable benefits to maximize public access, including building a modern, wider bridge with protected medians that should increase traffic flow, the addition of bicycle lanes, and the creation of landscaped sidewalks for pedestrian use. Public safety, which helps promote access, will be aided by signals at ingress and egress points and reconfigured driveways for the businesses north of the bridge. The project will also create a trail for pedestrian and equestrian use that will connect to an existing trail and the planned "Crest to Coast" trail. At the intersection of El Camino Real and San Dieguito Road, a new signal pole and American with Disabilities Act compliant curb ramps will provide public access to the proposed sidewalk and the planned San Dieguito Lagoon (W-19) trail connection.

In response to the public comment, maximized public access is a core component of the project, well detailed in this report and the City's various CEQA documents. In addition, while reduced congestion by nature reduces energy consumption and greenhouse gas emissions, these are additional benefits that stem from the project itself and are not mandated independently of the project; thus, they are not necessary for the purpose of conflict resolution.

Water quality will be promoted by the replacement of an aging bridge subject to weather-related damage, flooding, and erosion, and as detailed in the Water Quality section, by installation of water treatment systems. Stormwater treatment and management devices will be installed along El Camino Real and Via de la Valle. Flow will be treated and collected by a series of storm drains and earthen channels to ultimately convey treated flows to the San Dieguito River. Within the landscaped sidewalk features, pervious areas are proposed including cobble swales that lead into biofiltration areas. Biofiltration basins are proposed to manage roadway runoff water quality. Overall, the proposed BMPs provide treatment for the 85th percentile storm event.