Comments from Agencies

Attachments: 2025-06-30 Letter - SDLRR NOP Comments.pdf

From: Dustin Fuller <dfuller@sdfair.com>
Sent: Monday, June 30, 2025 2:55:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Carlene Moore <cmoore@sdfair.com>; Tristan Hallman <thallman@sdfair.com>
Subject: 22nd DAA Comment letter on SDLRR NOP

Mr. Pesce,

Please find the 22nd DAA's comments on the Updated NOP for the LOSSAN SDLRR project attached. Should you have any questions or need clarifications, please do not hesitate to contact me.

Sincerely,
Dustin

Dustin Fuller
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Please consider the environment before printing this e-mail

June 30, 2025

SANDAG
ATTN: LOSSAN comments
1011 Union Street, Suite 400
San Diego, CA 92101

Re: **Updated Notice of Preparation (NOP) Comments for the Preparation of a Draft Environmental Impact Report (EIR) for the San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project**

To LOSSAN SDLRR Project Team,

Thank you for providing the 22nd District Agricultural Association (22nd DAA) an opportunity to comment on the Notice of Preparation (NOP) for the San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project.

The 22nd DAA — a self-funding state institution that has existed since 1891 — owns and operates the Del Mar Fairgrounds (Fairgrounds), the Surf & Turf Recreation Center, and the Del Mar Horsepark properties. The Fairgrounds, which opened in 1936, and the other 22nd DAA properties serve as iconic cultural and community gathering places that host the annual San Diego County Fair, summer and fall live horse race meets, and hundreds of other events and activities throughout the year. In total, live events attracted more than 2 million people to 22nd DAA properties in 2024, generating economic opportunities for small businesses, livelihoods for thousands of workers, tax revenue for critical local and state services, and cultural enrichment for San Diego County's communities. In addition, the 22nd DAA's properties also serve as a mega-evacuation center for San Diego County in times of emergencies, and the Fairgrounds is home to the City of Del Mar's Fire Station. It is also worth noting that the 22nd DAA recognizes its role as a steward of an environmentally sensitive area and has invested tens of millions of dollars in environmental mitigation and ecosystem monitoring over the past 15 years. The 22nd DAA continues to maintain and monitor those investments annually.

The 22nd DAA fully understands the regional impact and need for the LOSSAN SDLRR project. In the second half of 2024, the 22nd DAA was an active participant with other jurisdictions in SANDAG's Value Analysis (VA) process. This process was important to refining the goals of the project and identifying reasonable and feasible alternatives for the future of the LOSSAN Corridor in San Diego. The potential alignments that SANDAG ultimately identified through the VA process minimized negative impacts and merited further environmental study and analysis.

However, the 22nd DAA was very surprised to learn about the mention and inclusion of a potential "more northerly design concept of the San Dieguito to I-5 alternative alignment" ("more northerly design concept") as called out in Figure 3 of the NOP. The NOP's mention of this "more northerly design concept" — and it is simply a vague mention of an entirely new project with no description, no alignment shown, and zero details on what areas may or may not be impacted — makes it impossible to provide meaningful comments on potential environmental impacts. Currently, the only level of detail shared about this idea has come from a handful of public speakers at meetings. The concept presented is simply a crude drawing that has no business being suggested in the NOP of a multi-billion-dollar infrastructure project of national importance from a regional planning entity. The drawing, like others that have preceded it, shows an alignment that would necessitate the probable destruction and taking of the 22nd DAA's property, including portions of the Surf & Turf Recreation Center campus, the Del Mar Fire Station, and the Facilities operations warehouse that is important to the events and activities at the Fairgrounds. On its face, such a plan is neither thoughtful nor feasible, and the concept once again relies entirely on bringing people *through* the Fairgrounds rather than *to* the Fairgrounds.

The inclusion of this "more northerly design concept" was especially disappointing after the thorough VA process that involved engineers, technical experts, political leaders, and highly qualified staff evaluating myriad proposals in a serious and fact-based discussion. The "more northerly design concept" flies directly in the face of the VA study goal to "Minimize impacts to existing homes, businesses, tourism, and major economic generators, including the Del Mar Fairgrounds, and transportation facilities during and after construction." It is equally difficult to see how the concept meets the criteria established by the other project goals, such as improving rail service reliability and demonstrating good public stewardship. In addition, the concept, as vaguely presented, demands two consecutive 90-degree turns for all trains using the corridor, which would almost certainly cause a significant slowdown in rail service. To put it plainly, this concept is not serious, and it is not deserving of serious consideration from SANDAG. The "more northerly design concept" is fantasy, and it does not meet any reasonable threshold for inclusion in the NOP. Legitimizing the idea by including a mention of it in the new NOP without any analysis, description, or detail is an insult to the work that went into the VA process.

The mention of this "more northerly design concept" in the official NOP also leaves the 22nd DAA in an awkward position. With no other information to base comments on, the 22nd DAA must instead make assumptions regarding specific potential environmental impacts. As such, the 22nd DAA incorporates by reference, all comments made in the 22nd DAA's NOP Comment letter dated July 19, 2024. This letter addresses potential environmental impact concerns of the 22nd DAA on the former Alternative A Alignment of the June 4, 2024 NOP issued by SANDAG. It appears that the "more northerly design concept" could result in environmental impacts similar to those that would be caused by Alternative A.

To be clear: the "more northerly design concept" would cause a great deal of harm to the 22nd DAA and to the entire region during its years-long disruptive construction and subsequent operations. As haphazardly suggested, the "more northerly design concept" could jeopardize the 22nd DAA's ability to produce the Fair and host the hundreds of events that draw visitors from across the San Diego region and around the world, creating an estimated $682 million annual economic impact (in 2019 dollars) for the County. Therefore, the proposed "more northerly design concept" — or any subsequent variation thereof — threatens the 22nd DAA's ability to financially survive and could effectively end current operations at the Fairgrounds. This means livelihoods would be obliterated and activities and events enjoyed by generations of San Diegans would be no more.

In addition, the continued consideration of the "more northerly design concept" severely impacts the 22nd DAA's ability to plan and improve the Fairgrounds property. The 22nd DAA's recent investments in its properties — including investments in environmental initiatives — could be rendered moot and destroyed by the construction of the "more northerly design concept." Even the consideration of the "more northerly design concept" at this point makes ongoing strategic and master planning more difficult for the 22nd DAA. Continued capital improvements could be deferred or canceled if the "more northerly design concept" consideration moves forward.

Accordingly, **the 22nd DAA urges SANDAG to remove the "more northerly design concept" from consideration or issue a new NOP that provides detailed plans and a full description of the concept.**

In addition, the 22nd DAA hereby submits the following detailed comments on the scope of work, analysis, and mitigation measures to be included in the draft Environmental Impact Report (EIR) for the project.

Project Understanding

The proposed SDLRR project is the improvement and potential relocation of the existing single-track alignment where the rail line runs along a terrace on the coastal bluff in the Cities of Del Mar and San Diego. This includes double tracking the alignment between the future Special Events Platform that will be constructed as part of the San Dieguito Double Track Project in the City of Del Mar and the north end of Sorrento Valley in the City of San Diego. The project may include removal of existing stabilization infrastructure (consistent with the California Coastal Commission's requirements) and may include aerial structures and berms.

The project description included in the Updated NOP consists of four alternative alignments, including three "tunnel alternatives" and one "non-tunnel alternative." The three tunnel alternative alignments are (1) San Dieguito Bridge to I-5 Alternative Alignment; (2) Under Crest Canyon Alternative Alignment; and (3) Under Camino Del Mar Alternative Alignment. Each tunnel

alternative would require a north and south portal, a bored tunnel connecting the portals, and double tracking of the rail line. The non-tunnel alternative, referred to as the Del Mar Bluffs Double Track Reinforced Alternative Alignment, requires construction of a second railroad track adjacent to the existing line on the Del Mar bluffs, retaining walls, bluff stabilization, bridge structures, and associated operational facilities.

Comments

Project Description

The 22nd DAA acknowledges and appreciates the change in alignment of the San Dieguito Bridge to I-5 Alternative Alignment to south of the Fairgrounds when compared to the 2024 NOP (previously known as Alternative A). However, the Updated NOP's Figure 3 map includes a fine-print asterisk stating that a "more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process." The project description should clearly describe this design concept and its location. In accordance with the CEQA Guidelines Section 15082, a Notice of Preparation, at a minimum, shall include a description of the project and location of the project (CEQA Guidelines Section 15082(1)(a) and (b)). The inclusion of this asterisk of a possible northern alignment does not meet the criteria of CEQA Guidelines Section 15082, as it does not fully describe the project or its location. By not disclosing any further information about a "more northerly design concept," the public and responsible agencies are not supplied with sufficient information to comment or make meaningful responses regarding the potential environmental effects of this alignment. Should SANDAG move forward with project-level analysis within the EIR on a more northern alignment, the NOP would be considered inadequate and should be re-released detailing this alignment to allow for meaningful comments.

The project description should also clarify the plans for the future Special Events Platform. The 22nd DAA appreciates the partnership and communication with SANDAG on the platform project and construction logistics. The project will help take vehicles off the road and therefore reduce greenhouse gas emissions as it brings visitors to Fairgrounds in the future. But the project description should be clearer. As currently planned, the Platform would only be used during special events and not operate as a regular "station." The project description should confirm that future use of the platform would operate in the same manner. For the proposed alternative alignment, the project description should also discuss the potential demolition and removal of existing rail segments that will no longer be used upon completion of the proposed project and how the demolition and removal process could impact resources. Further, the project description should discuss the project's schedule and the effect on operation of the 22nd DAA activities. Additionally, the project description should further describe the project objectives regarding minimizing impacts to major economic generators, including the Del Mar Fairgrounds.

Air Quality

The proposed project includes construction that will result in air pollutant emissions. The analysis within the draft EIR should discuss how the proposed project will address air quality impacts, including any mitigation measures that would ensure compliance with the San Diego County Air Pollution Control District.

Biology

The San Dieguito Bridge to I-5 Alternative Alignment runs through San Dieguito Lagoon and the surrounding open space area of Los Peñasquitos Lagoon. Therefore, construction and operation activities of the project could result in a significant impact on sensitive upland and wetland vegetation communities, movement of wildlife species, and sensitive habitat and special status species development, specifically in the lagoons where federally and state-protected plant and wildlife species occur. This Alternative would run through estuarine and marine deepwater, estuarine and marine wetland, freshwater forested/shrub wetland, and freshwater emergent wetland habitats. The analysis within the draft EIR should discuss how the proposed project will coordinate with the U.S. Army Corps of Engineers, including any mitigation measures that would ensure compliance with the Clean Water Act. Further, the draft EIR should include a discussion about project related impacts to existing long term wetland mitigation projects.

Additionally, the analysis within the draft EIR should discuss compliance with the City of San Diego Multi-Habitat Planning Area that encompasses both lagoon areas, as well as some surrounding areas.

Cultural Resources

Due to the proposed project's location within and surrounding water sources, there is potential for archaeological resources to be unearthed during construction activities. The draft EIR should discuss project related impacts to potential historical or archaeological resources.

Energy

The draft EIR should discuss how much additional energy would be required for operation of the San Dieguito Bridge to I-5 Alternative Alignment compared to the existing rail.

Geology and Soils

The 22nd DAA is concerned that the nature of construction could result in significant impacts related to geology and soils; in particular, soil erosion and risks associated with seismic ground shaking. The draft EIR should include discussion of how the surrounding land uses, including the Del Mar Fairgrounds, will be affected by noise and vibration resulting from construction and operation of the project alternatives, including discussion of the seismic safety of Fairgrounds and 22nd DAA buildings with the addition of vibration sources from construction and operation of the

project. Further, a geotechnical study should be completed to determine project related impacts to geology and soils.

Greenhouse Gas Emissions

Construction and operation of the proposed project will result in greenhouse gas emissions. The analysis within the draft EIR should discuss greenhouse gas emissions resulting from construction and operation of the project.

Hazards

The proposed project would use heavy equipment for construction activities. Both construction and operations-related hazardous materials could include fuel, solvents, paints, oils, and grease. During construction activities, there is also the potential for hazardous materials to be identified during demolition, excavation, and grading activities. The analysis within the draft EIR should discuss how the proposed project will comply with all applicable existing laws, regulations, and policies related to hazards.

Hydrology and Water Quality

The 22nd DAA is concerned with impacts related to watershed and drainage characteristics, flood-related hazards, and water quality issues. Effects on hydrology and water quality from the proposed underground platform should be further analyzed. The draft EIR should discuss project compliance with applicable regulatory standards (Federal Clean Water Act/National Pollutant Discharge Elimination System, Regional Water Quality Control Board Basin Plan, Coastal Resilience Master Plans, etc.). The draft EIR should also discuss project compliance with the proposed living levees planned for at the north and south banks of the San Dieguito River, in accordance with the Del Mar's Sea Level Rise Adaptation Plan of 2018.

Land Use

The 22nd DAA is concerned that the San Dieguito Bridge to I-5 Alternative Alignment will conflict with the existing land use at the Fairgrounds. Construction of the proposed project may affect operation at 22nd DAA properties, depending on construction scheduling and construction staging locations. Further, the draft EIR should discuss the San Dieguito Bridge to I-5 Alternative Alignment's (and the to be determined proposed alternative alignment) impacts to land use regarding the following proposed projects within the project site: living levees planned for at the north and south banks of the San Dieguito River in accordance with the Del Mar's Sea Level Rise Adaptation Plan of 2018, and the Coast to Crest Trail segment planned from the Fairgrounds to Jimmy Durante Boulevard. The impacts to the Fairgrounds will result in significant conflicts with various elements/components of the City of Del Mar Community Plan and the 22nd DAA 2008 Master Plan. A complete and thorough evaluation of how the proposed project is or is not compatible with the following plans is needed: City of Del Mar Community Plan, 22nd DAA 2008

Master Plan, City of Del Mar Local Coastal Program and Amendments, City of Del Mar Sea-Level Rise Adaptation Plan, and San Dieguito River Park Concept Plan.

Noise

The City of Del Mar is subject to a fairly stringent noise ordinance. The analysis within the draft EIR should discuss how the proposed project will adhere to the noise ordinance including any mitigation measures that would ensure compliance. Each alternative would generate construction noise near sensitive land uses (residential). Additionally, the effect of vibration from trains in the tunnel segments on residents, wildlife, and Fairgrounds visitors and domesticated animals (horses during horse races and livestock during the San Diego County Fair) should be fully evaluated and include any needed mitigation measures that would reduce impacts to less than significant levels. The equipment to be used for construction and operation, along with their associated decibel levels, should be further described to discuss the project related impacts to noise and vibration in the draft EIR.

Recreation

As discussed above, construction of the project would affect operation at the Fairgrounds and 22nd DAA properties depending on construction scheduling and construction staging locations. The impacts to the Fairgrounds would result in significant conflicts with various elements/components of the City of Del Mar Community Plan and the 22nd DAA 2008 Master Plan. The draft EIR should also discuss project compliance with the proposed living levees planned for at the north and south banks of the San Dieguito River in accordance with the Del Mar's Sea Level Rise Adaptation Plan of 2018. Additionally, the draft EIR should also discuss the San Dieguito Bridge to I-5 Alternative Alignment's impacts to recreation regarding the Coast to Crest Trail segment planned from the Del Mar Fairgrounds to Jimmy Durante Boulevard within the project site. The "more northerly design concept," in particular, could have an extraordinary impact on this segment of the Coast to Crest Trail.

Transportation

The proposed project has the potential to result in significant impacts to several local street segments, signalized and un-signalized intersections, freeway ramps, and freeway mainline sections. Specifically, construction and demolition haul trips would impact traffic throughout the construction of the proposed project. A Transportation Impact Study, Circulation and Parking Analysis, and a Local Mobility Analysis should be completed to define project-related impacts to transportation and traffic.

Tribal Cultural Resources

A record search should be conducted during the EIR process to determine if any Tribal Cultural Resources are present within the project area. Consultation with California Native American Tribes should also be conducted during the EIR process.

Utilities and Service Systems

The proposed project includes the relocation of utilities as needed, which would require connections to the existing water supply system, wastewater infrastructure, and existing stormwater infrastructure. The analysis within the draft EIR should discuss how the proposed project would impact existing utilities and service systems, and what is planned for existing utilities that will no longer be used with the new rail alignments. Additionally, the draft EIR should include will-serve letters from existing utilities and service systems to analyze existing capacity to support the project.

Cumulative Impacts

The cumulative analysis prepared for the proposed project should include a complete listing of all projects used in the analysis (past, present and reasonably anticipated future projects). Specifically, the draft EIR should include a discussion about project related impacts to existing long term wetland mitigation projects.

The 22nd DAA suggests communication/coordination on cumulative impacts so that the cumulative analysis includes an accurate listing of reasonably anticipated future projects that the 22nd DAA has identified in its 2008 Master Plan and those that may be included in the 2026 Master Plan Update.

The 22nd DAA is hopeful that the draft EIR prepared will be a thorough and comprehensive evaluation of the proposed project's individual and cumulative impacts — and that it will not include any further mention of an unvetted "more northerly design concept." We look forward to reviewing the draft EIR. If you have any questions about the comments contained in this letter, please don't hesitate to contact 22nd DAA Supervising Environmental Planner Dustin Fuller at 858.792.4212 or via email at dfuller@sdfair.com.

Sincerely,

Carlene Moore
Chief Executive Officer
22nd District Agricultural Association

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2024060038_NOP_LOSSAN_CDFW_Comments_FINAL_062.pdf

From: Burlaza, Melanie@Wildlife <Melanie.Burlaza@Wildlife.ca.gov>
Sent: Monday, June 30, 2025 11:17:37 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Schmalbach, Heather@Wildlife <Heather.Schmalbach@Wildlife.ca.gov>; Lubcke, Glen@Wildlife <Glen.Lubcke@Wildlife.ca.gov>; Wilson-Olgin, Erinn@Wildlife <Erinn.Wilson-Olgin@wildlife.ca.gov>; Snyder, Jonathan <jonathan_d_snyder@fws.gov>; Kershek, Lauren <lauren_kershek@fws.gov>; Turner, Jennifer@Wildlife <Jennifer.Turner@wildlife.ca.gov>; Wilkins, Eric@Wildlife <Eric.Wilkins@wildlife.ca.gov>; Hart, Leslie@Wildlife <Leslie.Hart@Wildlife.ca.gov>; Price, Jason@Wildlife <Jason.Price@wildlife.ca.gov>; Penaflor, Gabriel@Wildlife <Gabriel.Penaflor@Wildlife.ca.gov>
Subject: CDFW Comments on the Updated NOP for the LOSSAN Realignment Project (SCH #2024060038)

Hi Tim,

Please see the attached CEQA comment letter on the Updated NOP for the LOSSAN Realignment Project. Thank you for the opportunity to comment on the Project. Please reach out to Heather Schmalbach (Heather.Schmalbach@wildlife.ca.gov) if you have any questions.

Sincerely,

Melanie Burlaza

Melanie Burlaza
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CALIFORNIA DEPARTMENT OF FISH and WILDLIFE

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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

June 30, 2025

Tim Pesce
SANDAG
1011 Union Street, Suite 400
San Diego, CA 92101
LOSSANcomments@sandag.org

Subject: Updated Notice of Preparation of a Draft Environmental Impact Report for the San Diego-Los Angeles-San Diego-San Luis Obispo Rail Realignment Project, SCH #2024060038, San Diego County, CA

Dear Tim Pesce:

The California Department of Fish and Wildlife (CDFW) has reviewed the Updated Notice of Preparation (Updated NOP) of the Draft Environmental Impact Report (DEIR) from the San Diego Association of Governments (SANDAG) for the San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1]. CDFW provided comments on the initial NOP for the Project in a letter dated July 19, 2024.

Thank you for the opportunity to provide supplementary comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review

[1] CEQA is codified in the California Public Resources Code in section 21000 *et seq*. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plants pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project Proponent obtain appropriate authorization under the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego participates in the NCCP program through implementation of its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and Implementation Agreement (IA). The Project may impact the City of San Diego's Multi-Habitat Planning Area (MHPA), which delineates core biological resource areas and corridors targeted for conservation under the SAP.

PROJECT DESCRIPTION SUMMARY

Proponent: SANDAG

Objective: The objective of the Project is to improve resiliency and reliability of rail service along the San Diego segment of the LOSSAN rail corridor. The Updated NOP identifies four Project alternative alignments (Figure 1), which will be analyzed in more detail in the DEIR. Three alternatives include a bored tunnel with a north and south portal. The fourth alternative does not include a bored tunnel or portals. All four alternatives include double tracking of the rail line.

Location: The Project is located along a 60-mile section of the 351-mile LOSSAN Rail Corridor between the future Special Events Platform to be constructed as part of the San Dieguito Double Track Project in the City of Del Mar and the Sorrento Valley Station in the City of San Diego. The current rail alignment runs through Los Peñasquitos Lagoon on an existing berm and along the coastal bluffs. The Project's study area is generally bounded by the Pacific Ocean to the west and Interstate 5 (I-5) to the east.

History: Formal environmental review of the Project was initiated in June 2024 when SANDAG released an NOP (2024 NOP), which identified three proposed alternative alignments and a No Project alternative for consideration in the DEIR. The alternatives included relocation of the existing railroad tracks inland at various locations between the

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Sorrento Valley Station and the Solana Beach Station and replacement with a double-track alignment. In response to public feedback received during this initial scoping period, SANDAG initiated a Value Analysis (VA) Study between September and December 2024 to gather additional public input on the 2024 NOP proposed alternatives and identify other potential project alignments. The Updated NOP outlines four proposed alternative alignments informed by the VA Study and a No Project alternative.

Alternatives:

San Dieguito Bridge to I-5 Alternative Alignment: This alternative would transition south from the future San Dieguito Double Track Project bridge or Special Events Platform and curve to the east on a bridge located adjacent to the south side of San Dieguito Lagoon before entering a tunnel at the Racetrack View Drive North Portal. The alignment would continue under I-5 and exit at the Knoll Near I-5 South Portal and transition back to the existing rail line north of Sorrento Valley Station. This alternative differs from the 2024 NOP *Alternative A I-5 Alignment* which would have tunneled under San Dieguito Lagoon.

Under Crest Canyon Alternative Alignment: This alternative would descend south from the San Dieguito Double Track bridge and enter a tunnel at the Under Jimmy Durante Boulevard North Portal, then continue under Crest Canyon and exit at the Knoll Near I-5 South Portal, before transitioning back to the existing alignment. This alternative is similar to the 2024 NOP *Alternative B Crest Canyon Alignment* with some minor changes to the alignment to avoid existing homes and easements.

Under Camino Del Mar Alternative Alignment: This alternative would descend immediately south of the future San Dieguito Double Track Project bridge and enter a tunnel at the Under Jimmy Durante Boulevard North Portal. The tunnel would extend south mostly under Camino Del Mar before exiting at the Torrey Pines Road West South Portal. It would then bridge over Los Peñasquitos Lagoon and transition back to the existing alignment. Double tracking of the existing alignment through Los Peñasquitos Lagoon would require raising and widening the existing berm to address flooding and sea level rise projections. This alternative is similar to the 2024 NOP *Alternative C Camino del Mar Alignment* but has a slightly shorter tunnel and more closely follows the current alignment.

Del Mar Bluffs Double Track Reinforced Alternative Alignment: This alternative would follow the existing alignment and descend into a trench south of the Camino Del Mar roadway bridge before continuing south on a bridge and widened berm through Los Peñasquitos Lagoon before transitioning back to the existing alignment. This alternative would include construction of bluff stabilization elements, including new and expanded seawalls.

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Depending on the alternative, additional Project activities could include: removal of existing rail infrastructure; construction of bridge structures, U-structures, retaining walls, flood walls, twin-bored tunnels, cut-and-cover tunnels, tunnel portals, and associated portal infrastructure; installation of a tunnel system power supply, tunnel ventilation systems, and communication systems; modifications of drainage and roadways; relocation of utilities; expansion of sea walls; potential placement of beach-quality sand from excavation; and, removal of prior bluff stabilization improvements.

Figure 1. Map of proposed alternative alignments

Biological Setting: Potential impacts may occur to San Dieguito Lagoon and Los Peñasquitos Lagoon. Both lagoons provide important habitat for a variety of species. Encompassed within San Dieguito Lagoon is the 110-acre San Dieguito Lagoon Ecological Reserve (SDLER), a CDFW owned-and-managed property and designated State Marine Conservation Area. Habitats within the SDLER include riparian and coastal wetland communities, as well as California coastal sage scrub. Los Peñasquitos Lagoon is a 565-acre coastal estuary and is part of the Torrey Pines State Natural Reserve, which is owned and managed by California State Parks. The lagoon and adjacent uplands provide potential habitat for a multitude of sensitive plant, invertebrate, amphibian, reptile, bird, and mammal species (Attachment A). Several special status

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bird species known to occur within the lagoons or adjacent uplands include: Belding's savannah sparrow (*Passerculus sandwichensis beldingi;* CESA-endangered), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis;* State Species of Special Concern (SSC)), coastal California gnatcatcher (*Polioptila californica californica;* Federal Endangered Species Act (ESA) threatened, SSC), light-footed Ridgway's rail (*Rallus obsoletus brevipes;* federal and state endangered, State Fully Protected), California least tern (*Sternula antillarum browni;* ESA- and CESA-endangered; State Fully Protected), western snowy plover (*Charadrius nivosus nivosus*; ESA-threatened, SSC), and least Bell's vireo (*Vireo bellii pusillus;* ESA- and CESA-endangered). There may also be suitable upland habitat on the Project site for Crotch's bumble bee (*Bombus crotchii;* candidate CESA listing).

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist SANDAG in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts to fish and wildlife (biological) resources. The DEIR should provide adequate and complete disclosure of the Project's potential impacts to biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151].

Specific Comments

1) Alternatives Analysis. The *Under Camino Del Mar* and *Del Mar Bluffs Double Track Reinforced* alternatives would both result in significant environmental impacts from construction of a double track alignment through Los Peñasquitos Lagoon. Given that the existing single-track bridge already alters the hydrology and negatively affects the biological function of Los Peñasquitos Lagoon, CDFW strongly recommends against these two alternatives. CDFW does not support the *San Dieguito Bridge to I-5 Alternative Alignment* which, as depicted in the Updated NOP, could result in potentially significant impacts to the SDLER. CDFW considers the *Under Crest Canyon Alternative Alignment* to have the greatest potential to minimize the environmental impacts from the proposed Project.

   The DEIR should include a thorough analysis of environmental impacts resulting from all four alignment alternatives, both during construction and during operation and maintenance, including but not limited to:

   a) habitat impacts;
   b) special-status species impacts;
   c) construction noise and vibration impacts;
   d) operational noise and vibration impacts;
   e) hydrological impacts;
   f) water quality impacts; and,
   g) groundwater impacts.

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2) CDFW Ecological Reserve Impacts. As described in the NOP, the *San Dieguito Bridge to I-5 Alternative Alignment* would involve construction of a bridge up to 50-feet tall along the southern boundary of the SDLER. CDFW is concerned with potential impacts to biological resources and existing recreational opportunities from the construction and operation of an elevated bridge structure directly adjacent to the reserve. SDLER is the site of significant tidal wetland restoration efforts and provides specialized habitat for many listed species. The reserve supports several nesting sites for the California least tern that nests on unvegetated substrates and forages in shallow open water areas and mudflats. California least terns make their nests in exposed areas on the ground, leaving their eggs extremely vulnerable to predators such as raptors. The reserve also provides many valued recreational opportunities for the public. The existing Grand Avenue Bridge along the south side of the lagoon is a popular viewing platform for local birders and is adjacent to a frequently utilized designated fishing area.

   The DEIR should include a thorough analysis of the following elements, at a minimum, as they pertain to the *San Dieguito Bridge to I-5 Alternative Alignment*:

   a) permanent and temporary (including direct and indirect) biological impacts to San Dieguito Lagoon from construction and operation of the Project, including impacts to California least tern nesting sites as a result of new and expansive perching opportunities on the proposed bridge structure for raptors such as Peregrine falcons and red-tailed hawks;
   b) impacts to access and use of existing recreational opportunities such as the Grand Avenue Bridge and designated fishing areas, as well as future projects such as the trail extension from Grand Avenue Bridge to the Crest Canyon Trail within the City of Del Mar;
   c) hydrological alterations to San Dieguito Lagoon;
   d) shading impacts to marsh vegetation adjacent to the bridge structure;
   e) impacts to species from construction noise and vibration;
   f) impacts to species from operational noise and vibration; and
   g) if direct impacts to CDFW-owned lands may occur, identification of the appropriate legal mechanism through which any rights-of-way and/or easements would be acquired.

   Given that the *San Dieguito Bridge to I-5 Alternative Alignment* will potentially affect CDFW lands, we would welcome the opportunity to meet with SANDAG ahead of the DEIR preparation to discuss the biological resources impacts associated with the Project, including site-specific impacts, mitigation measures, and right-of-entry challenges.

3) City of San Diego MSCP Preserve Impacts. All four alternative alignments have the potential to directly or indirectly impact conserved MHPA within the Torrey Pines State Natural Reserve, San Dieguito Lagoon Ecological Reserve, or Crest Canyon

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Preserve. These conserved lands provide sensitive habitat for several Covered Species under the City of San Diego's SAP, including light-footed Ridgway's rail, Belding's savannah sparrow, coastal California gnatcatcher, western snowy plover, California least tern, Nuttall's lotus (*Acmispon prostratus* [formerly *Lotus nuttallianus*]), and salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum* [formerly *Cordylanthus maritimus* ssp. *maritimus*]). Furthermore, the SAP identifies the Los Peñasquitos Lagoon as a core biological resource area and describes it as one of the few intact natural open spaces in coastal San Diego County that is still linked to larger expanses of habitat to the east. Several wildlife corridors have been identified within or connected to the Lagoon, some of which are no longer viable due to expanded urban development, channels occluded with vegetation, and bridge spans obstructed by sediment. However, surveys have detected a functional wildlife corridor through the natural riparian channel that connects Los Peñasquitos Canyon to the Lagoon through Sorrento Valley (Crooks 1997).

CDFW recommends that the DEIR analyze the Project's consistency with the conservation goals of the SAP, in addition to any potential impacts to MSCP conserved lands (including impacts to MHPA and any identified wildlife linkages/corridors) and Covered Species. If unavoidable impacts may occur, the DEIR should outline how those impacts will be offset consistent with the MSCP. This could include opportunities to expand or enhance habitat corridors, linkages and/or undercrossings for wildlife in and around the Lagoon.

4) Knoll Near I-5 Portal Location. The southern portal proposed for the *San Dieguito Bridge to I-5* and *Under Crest Canyon* alternative alignments is located at a knoll south of Carmel Valley Road, between I-5 and the segment of Sorrento Valley Road Trail that is open to bikes, pedestrians, and some authorized vehicles but closed to public vehicle traffic. The portal would exit from the knoll and extend into Los Peñasquitos Lagoon. Protocol-level surveys were conducted in 2023 for light-footed Ridgway's rail, coastal California gnatcatcher, least Bell's vireo, and southwestern willow flycatcher (AECOM 2023, Figure 4B; Attachment B). The survey identified at least two pairs of light-footed Ridgway's rail and several individuals in the brackish marsh habitat at the northeastern portion of Los Peñasquitos Lagoon, immediately south of the proposed Knoll Near I-5 Portal location. The two alternatives that would utilize this portal propose resurfacing the tunnel through the knoll and constructing new track through the brackish marsh habitat at the northeastern portion of Los Peñasquitos Lagoon to connect with existing track. The segment through Los Peñasquitos Lagoon would significantly impact known light-footed Ridgway's rail habitat and has the potential to result in take of this Fully Protected species.

Fully protected species, such as light-footed Ridgway's rail, may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows (see Fish & G. Code, §§ 2835, 3511, 4700, 5050, & 5515):

- Take is for necessary scientific research,

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- Efforts to recover a fully protected, endangered, or threatened species,
- Live capture and relocation of a bird species for the protection of livestock, or Under certain circumstances if they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan.

Specified types of infrastructure projects may be eligible for an incidental take permit for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). SANDAG should consult with CDFW early in the project planning process. Regardless of whether this Project is eligible for take authorization of state Fully Protected species or not, we encourage SANDAG to avoid potential take of light-footed Ridgway's rail by identifying a southern portal location farther south, which would avoid impacts to Los Peñasquitos Lagoon and light-footed Ridgway's rail.

5) Los Peñasquitos Lagoon Impacts. Coastal lagoons and estuaries are complex systems and are subject to numerous natural and anthropogenic drivers and feedback loops that can affect wetland ecology. The existing single-track berm and bridge through Los Peñasquitos Lagoon, which runs diagonally from the northwestern corner of the lagoon to the center of the southern portion, already alters the hydrology and affects the biological function of the lagoon. The *Under Camino Del Mar* and *Del Mar Bluffs Double Track Reinforced* alternatives both have the potential to result in potentially significant environmental impacts by raising and widening some sections of the existing berm while removing other sections and replacing it with a double track bridge. The current lagoon inlet location is fixed under the existing lower bridge span and is vulnerable to obstruction by marine sediments. Lagoon outflows are also hampered by other structures within the lagoon, including the railway berm, which limits the ability of outflows to naturally open the inlet.

   CDFW recommends the DEIR analyze potential impacts to the hydrological function of the lagoon and optimize the engineering and design of any proposed alterations (e.g., expansion or removal) to the existing single-track berm and bridges to reduce impacts to wildlife and promote tidal flow to the lagoon. CDFW also recommends continued coordination with the City of San Diego regarding the Los Peñasquitos Lagoon Enhancement Plan that outlines phased restoration activities within the lagoon. The *Under Camino Del Mar* and *Del Mar Bluffs Double Track Reinforced* alternative alignments would likely impact Phase 1 of the Los Peñasquitos Lagoon Enhancement Plan and all four alternatives plus the Knoll Near 1-5 Portal would potentially impact Phase 2. Changes to the existing rail structures (e.g., expanded berms and/or elevated causeways) could affect improvements that depend on enhanced hydrology like extending tidal circulation and floodplain enhancements. The DEIR should identify any conflicts between the Project and the City's planned restoration activities within Los Peñasquitos Lagoon and the proposed remedies for any conflicts.

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6) Tunnel Boring Machine (TBM) Failure Provisions. The DEIR should discuss contingency planning if a TBM needs to be salvaged and recovered in the event of a major malfunction during Project construction. There is a documented instance of TBM malfunction on a project in Seattle, requiring workers to remove the machine to perform repairs (Lindblom, 2014). An 80-foot-wide, 120-foot-deep access pit had to be excavated using heavy machinery, which delayed the Seattle project by two years. Given that three of the four proposed alternative alignments outlined in the Updated NOP involve use of TBMs to construct tunnels, the DEIR should detail a salvage and recovery strategy should the TBM malfunction. The discussion should include an analysis of potential new ground disturbance resulting from emergency salvage and recovery activities and the concomitant impacts to biological resources.

7) Crotch's bumble bee. The Project site supports multiple vegetation types that may provide nesting, foraging, or overwintering habitat for Crotch's bumble bee. If Crotch's bumble bee is present at the Project site, grading or clearing of vegetation related to Project activities may result in temporal or permanent loss of suitable habitat. In addition, ground-disturbing activities and vegetation removal during construction and tunneling activities may result in take of Crotch's bumble through direct mortality of adults, eggs, and larva, and indirect impacts to the species associated with burrow collapse, nest abandonment, and reduced nest success.

   a. Protection Status. The California Fish and Game Commission accepted a petition to list Crotch's bumble bee as threatened or endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Crotch's bumble bee is granted full protection of a threatened or endangered species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, Crotch's bumble bee has a State ranking of S1/S2, meaning Crotch's bumble bee is imperiled, critically imperiled and extremely rare. Crotch's bumble bee is also listed as an invertebrate of conservation priority under the Terrestrial and Vernal Pool Invertebrates of Conservation Priority[2] (CDFW 2017).

   b. Surveys and Disclosure[3]. CDFW recommends that SANDAG retain a qualified biologist familiar with the species to perform a habitat assessment and focused surveys of the Project site for Crotch's bumble bee and include the results in the DEIR. Surveys for Crotch's bumble bee should be conducted according to the guidance provided in CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bree Species (June 6, 2023)[4]. We

[2] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=149499&inline
[3] Note that lack of records in the CNDDB for Crotch's bumble bee at the Project site does not mean that Crotch's bumble bee is absent. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review.
[4] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline

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strongly recommend consultation with CDFW to ensure survey methodology will yield valid results. The DEIR should provide full disclosure of the presence of Crotch's bumble bee and any potential impacts to the species from the Project.

c. Avoidance. The DEIR should include measures to first avoid impacts to Crotch's bumble bee. If Crotch's bumble bee is present, a qualified biologist should identify the location of all nests in or adjacent to the Project site. If nests are identified, a minimum 50-foot avoidance buffer zone should be established around nests to reduce the risk of unauthorized take. If the Project cannot avoid impacts, CDFW recommends that the Project Proponent consult with CDFW to determine if a CESA Incidental Take Permit (ITP) is required.

d. CESA ITP. Appropriate take authorization from CDFW under CESA may include an ITP, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the Project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP for the Project unless the Project's CEQA document addresses all the Project's impact on CESA endangered, threatened, and/or candidate species. It is important that any proposed take authorized by a CDFW ITP be described in detail in the Project's CEQA document. The Project's CEQA document should also specify a mitigation, monitoring, and reporting program of sufficient detail and resolution to satisfy the requirements for an ITP. However, please note that mitigation for the Project's impacts on CESA endangered, threatened, and/or candidate species in the Project's CEQA document may not necessarily satisfy mitigation required to obtain an ITP.

8) Beach/Nearshore Sediment Placement Impacts. The Project proposes to place beach-quality sand excavated from tunnel boring activities onto beach(es) or nearshore in the vicinity of the study area. Beach or nearshore sediment placement could bury sensitive marine species and their rocky bottom habitats via direct sediment placement or subsequent littoral drift resulting in substantial adverse effects. Habitat Areas of Particular Concern (HAPC), a subset of Essential Fish Habitat, are habitats of special importance to fish populations due to their rarity, vulnerability to development and anthropogenic degradation, and/or ability to provide key ecological functions. Several types of HAPC may occur at the proposed sediment placement site(s), including rocky reefs, seagrass (e.g., surfgrass), eelgrass, and/or canopy kelp (e.g., giant kelp). These habitat areas have been designated as groundfish HAPC by the Pacific Fisheries Management Council under the Magnuson-Stevens Fishery Conservation and Management Act of 1976 (as amended in 2007).

Furthermore, San Diego waters support commercially and recreationally important fish and invertebrate species such as California grunion (*Leuresthes tenuis*),

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California halibut (*Paralichthys californicus*), Northern anchovy (*Engraulis mordax*), and California spiny lobster (*Panulirus interruptus*). Nearshore sediment placement activities could impact HAPC and the species that inhabit them via direct burial/smothering, increased turbidity, and/or decreased light availability. After the Project's proposed beach or nearshore sediment placement activity, indirect impacts from littoral drift include burial/smothering, increased turbidity, and/or decreased light availability to rocky reef, seagrass, eelgrass, and/or algal communities. The NOP does not address how the potential indirect effects would be monitored and/or mitigated for post-construction to avoid and minimize impacts to important species and HAPC.

California grunion (grunion) is an ecologically, recreationally, and culturally important species in southern California, and a critical prey species for numerous marine species. Grunion are vulnerable to disturbance from beach placement projects within the intertidal and nearshore areas during their reproductive cycle because they spawn and bury their eggs within the upper intertidal zone. Grunion has the potential to spawn within the Project's beach sediment placement footprint during the spawning season (March through August). Direct impacts could include crushing incubating eggs from driving heavy equipment within egg nests and burying incubating eggs from movement of sand, which may lead to inviable eggs or eggs unable to hatch out.

CDFW offers the following recommendations to address concerns regarding nearshore sediment placement:

a. The DEIR should quantify the amount of rocky reef, seagrass, eelgrass, and/or canopy kelp that could be lost due to the Project from nearshore sediment placement. If impacts cannot be avoided, compensatory mitigation may be required. Additionally, CDFW recommends the DEIR includes monitoring of the nearshore sediment placement to ensure HAPC is not impacted. CDFW recommends consultation with CDFW and NOAA Fisheries on the Project's impact analysis and all proposed mitigation measures for HAPC.

b. The DEIR should clarify the anticipated timing of sediment placement and if sediment being distributed across the beach profile will involve equipment operating below the mean high tide line. All beach placement operations should avoid equipment below the mean high tide line, unless sediment is placed in the swash zone due to high sand content. CDFW also recommends a long-shore and cross-shore sediment transport model be developed to identify appropriate sediment placement volumes and locations to avoid or minimize marine habitat impacts. Results from the sediment transport model should be included in the DEIR.

c. The DEIR should specify that all beach sediment placement activities will occur outside of grunion spawning season (March through August). If beach sediment

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placement does occur during grunion spawning season and the proposed beach placement site is considered suitable for grunion spawning, CDFW recommends the preparation of a grunion monitoring plan to be included in the DEIR. If grunion spawning occurs within the Project area, work in that area below the mean high tide line should not be conducted until after grunion eggs have hatched (2 weeks). The locations of the spawning run should be marked physically and/or by Global Positioning System (GPS) locations. The density of the grunion throughout the area should be noted using the Walker Scale[5]. The Project should ensure maintenance workers avoid the spawning area and that a 50-foot buffer is used to avoid impacting any spawning areas adjacent to the sediment placement sites. Grunion monitoring should be conducted by a qualified biologist for 30 minutes prior to and two hours following the predicted start of each spawning event. If more than 100 fish are reported, then avoidance and minimization measures should be implemented, such as relocation, rescheduling of work or equipment, or specification of acceptable vehicle routes.

9) Seawall Impacts. The *Del Mar Bluffs Double Track Reinforced Alternative Alignment* includes the construction of approximately 1.5 miles of seawalls up to approximately 20 feet in height to expand and increase the size of existing stabilization infrastructure. The construction of new and expanded seawalls has the potential to cause erosion, disrupt natural transport processes like sediment movement, and impact coastal species that rely on beaches for nesting and foraging. Although seawalls are designed to protect resources or infrastructures behind them from the impacts of wave energy and associated erosion, seawalls may accelerate erosion at the toe of the seawall and subsequently on adjacent beaches and bluffs as wave energy is reflected off seawalls. Seawalls can increase the velocity of the water flow and alter the natural process of sediment movement and transport patterns, including longshore sand transport, which cause greater erosion issues downdrift. Additionally, seawalls may also cause the loss of biodiversity since accelerated erosion could remove habitat in the sandy beach habitat and intertidal zone. Birds, fish, and invertebrates who rely on the sandy beach and intertidal habitats may lose nursery and foraging grounds.

   Seawalls can temporality protect infrastructure but ultimately results in accelerated erosion and the loss of the beach due to altered sediment movement and transport patterns. CDFW is concerned that the Updated NOP does not address potential impacts and/or changes to sediment circulation due to the placement of seawalls. The updated NOP also does not indicate the location or timing of the seawall construction activities, so it is CDFW's assumption that grunion may have the

[5] The Walker Scale is a qualitative assessment of the abundance of spawning grunion on a beach. It is scored as follows: W0 is no spawning fish, W1 is less than 100 spawning fish at different times in one or several locations, W2 is 100 – 500 fish spawning at different times in one or several locations, W3 is hundreds of fish spawning in several locations or over a broad area, W4 is thousands of fish together for less than an hour, and W5 is fish covering the beach lasting for over an hour.

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potential to spawn within the Project's seawall construction footprint during the spawning season.

CDFW offers the following recommendations to address marine concerns regarding seawalls:

a. Considering the potential placement of new and expanded seawalls, CDFW recommends the DEIR include an assessment of Project impacts that may cause beach removal/erosion, including wave reflection and sediment suspension, seabed scour dynamics, and sediment circulation or transport rates. Any potential changes to erosion rates, or changes to the natural slope and sand composition of the beach ecosystems as it relates to marine life and habitat, should be analyzed. Additionally, the DEIR should include pre- and post-construction surveys and monitoring to fully assess potential and actual marine habitat losses and degradation. Results of these surveys should be submitted to CDFW Marine Region.

b. If construction activities for the seawall must occur on the beach, the DEIR should specify that activities be conducted above the highest high-water mark to minimize impacts to marine and intertidal species from heavy equipment and beach driving. Any beach construction of the seawall should occur outside of spawning and/or nesting seasons. If any beach construction for the seawalls must occur below the mean high tide line, the DEIR should specify the work be conducted outside of grunion spawning season. If construction during grunion spawning season cannot be avoided and the proposed construction site is considered suitable for grunion spawning, a grunion monitoring plan and avoidance measures (as outlined in Comment 9(c) above) should be included in the DEIR.

10) Lake and Streambed Alteration. As described, the Project may have biological impacts to Los Peñasquitos Lagoon and San Dieguito Lagoon. Both lagoons are ecologically sensitive resources and host an array of listed and non-listed species. The DEIR should include an analysis of the Project's direct, indirect, and cumulative impacts to hydrologic features, including a discussion of impacts as they pertain to Fish and Game Code section 1600 *et seq.* CDFW recommends that SANDAG coordinate with CDFW to assess whether notification is appropriate. CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project Proponent must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to

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conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. A Notification package for a LSAA may be obtained by accessing CDFW's Lake and Streambed Alteration Program website[6].

11) Wetlands and Associated Natural Communities. According to the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Mapper[7], there are two wetland features on the Project site (USFWS 2022) that may be impacted by Project activities. Impacts would occur from construction of a double track berm and bridge through Los Peñasquitos Lagoon as described in the *Under Camino Del Mar* and *Del Mar Bluffs Double Track Reinforced* alternative alignments, as well as construction of the Knoll Near 1-5 Portal. It is unclear whether the *San Dieguito Bridge to I-5* alternative alignment would impact wetlands associated with the San Dieguito Lagoon. Natural communities adjacent to the wetlands could be removed or degraded through habitat modification (e.g., loss of water source, encroachment by the Project, edge effects leading to introduction of non-native plants).

    a. Wetland Delineation and Impact Assessment. The DEIR should provide a wetland delineation, which should also identify streams, culverts, ditches, and storm channels that may transport water, sediment, pollutants, and discharge into any rivers, streams, and lakes[8]. The delineation should be conducted pursuant to the USFWS wetland definition adopted by CDFW (Cowardin et al. 1979). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification. In addition, the DEIR should disclose the total impacts (linear feet and/or acreage) including impacts resulting from fuel modification on any river, stream, or lake and associated natural communities.

    b. Avoidance and Setbacks. CDFW recommends the Project avoid impacts to streams, wetlands, and associated natural communities by avoiding or minimizing Project-related development adjacent to streams and wetlands. Herbaceous vegetation adjacent to streams protects the physical and ecological integrity of these water features and maintains natural sedimentation processes. CDFW recommends SANDAG design the Project so that wetland impacts are avoided and/or minimized. The DEIR should discuss how the Project has been designed to avoid and/or minimize impacts so CDFW may assess potential impacts to biological resources.

    c. Mitigation. If avoidance is not feasible, SANDAG should fully compensate for

[6] https://wildlife.ca.gov/Conservation/Environmental-Review/LSA
[7] https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper
[8] "Any river, stream, or lake" includes those that are dry for periods of time (ephemeral/episodic) as well as those that flow year-round (perennial). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a water body.

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impacts to wetlands, streams, and loss of associated natural communities. Higher mitigation should be provided to compensate for impacts to resources supporting rare, sensitive, or special status fish, wildlife, and natural communities.

General Comments

1) Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effects which the proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as assess the significance of the specific impact relative to the affected plant and wildlife species (e.g., current range, distribution, population trends, and connectivity).

2) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DEIR:

   a. A complete discussion of the purpose and need for, and description of the proposed Project;

   b. CDFW recommends SANDAG select Project designs and alternatives that would avoid and minimize direct and indirect impacts to biological resources. CDFW also recommends SANDAG consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a rule, CDFW recommends reducing a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

   c. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DEIR should include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6). Additionally, the criteria used to select a preferred alternative amongst all feasible alternatives should be transparent as to how biological resources were considered in decision making and route selection.

   d. Where the Project may impact aquatic and riparian resources, CDFW recommends SANDAG select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse

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and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level, which may cause the watercourse to alter its course of flow.

3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to Species of Special Concern (SSC) a significant and cumulative effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information:

   a. Information on the regional setting is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the Vegetation Classification and Mapping Program - Natural Communities[9] webpage.

   b. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*[10]. Botanical field surveys should be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project site. This usually involves multiple visits to the Project site (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine if special status plants are present.

[9] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities
[10] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

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c. Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project site and within adjacent areas. The Manual of California Vegetation[11], second edition, (Sawyer, Keeler-Wolf, & Evens, 2009) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts off-site.

d. A complete and recent assessment of the biological resources associated with each habitat type in the Project site and within adjacent areas. A full literature review includes but is not limited to CDFW's California Natural Diversity Database[12] (CNDDB). The CNDDB should be accessed to obtain current information on any previously reported sensitive species and habitat. An assessment should include a minimum nine-quadrangle search of the CNDDB to determine a list of species potentially present in the Project site. A nine-quadrangle search should be provided in the Project's CEQA document for adequate disclosure of the Project's potential impact on biological resources.

e. A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project site and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and day when the species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's Survey and Monitoring Protocols and Guidelines[13] for established survey protocol. Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service.

f. A recent wildlife and botanical field survey. A lack of records in the CNDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)). CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive

[11] https://vegetation.cnps.org/
[12] https://wildlife.ca.gov/Data/CNDDB
[13] https://wildlife.ca.gov/conservation/survey-protocols

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taxa, particularly if Project construction could occur over many years or in phases.

4) Direct and Indirect Impacts to Biological Resources. The DEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological resources with specific measures to offset such impacts. The DEIR should include the following:

   a. A discussion of potential impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts to biological resources. These include resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan such as the City of San Diego's MHPA (Fish & G. Code, § 2800 et. seq.)).

   b. A discussion of both the short-term and long-term effects of the Project on species population size and distribution, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, § 15126.2(a)).

   c. Impacts to, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR.

   d. A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts to habitat supported by groundwater. Measures to mitigate such impacts should be included.

   e. An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.

5) Cumulative Impact. Cumulative impacts to biological resources can result from collectively significant projects which are individually insignificant. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The Project may have the potential to substantially reduce the number or restrict the range of endangered, rare, or threatened species. Species that may be impacted by the Project include, but are not limited to, the biological resources described in this letter.

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Accordingly, CDFW recommends the DEIR evaluate the Project's potential cumulative impacts to biological resources. The Project may have a "significant effect on the environment" if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (Pub. Resources Code, § 21083(b)). SANDAG's conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions. Specifically, if SANDAG concludes that the Project would not result in cumulative impacts to biological resources, SANDAG, "shall identify facts and analysis supporting the Lead Agency's conclusion that the cumulative impact is less than significant" (CEQA Guidelines section § 15130(a)(2)).

6) Nesting Birds. To avoid impacts to nesting birds, CDFW recommends clearing of vegetation outside of the peak avian breeding season, which generally runs from February 1 through September 1; as early as January 1 for some raptors. If Project construction is necessary during the avian breeding season, a qualified biologist should conduct weekly bird surveys for nesting birds three days prior to any construction to ensure no nesting birds would be impacted by the Project. If an active nest is identified, a buffer shall be established between the construction activities and the nest, so nesting activities are not interrupted. For the given Project site, CDFW recommends a 100-foot buffer from common avian species, 300 feet for listed or sensitive avian species, and 500 feet for raptors. The buffer should be delineated by temporary fencing and remain in effect dung construction. No Project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be allowable depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

7) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4).

   a. The DEIR should provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation

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monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

b. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures (CEQA Guidelines, § 15126.4(a)(1)). In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

8) Compensatory Mitigation. The DEIR should include compensatory mitigation measures for the Project's significant impacts (direct and/or through habitat modification) to sensitive and special status plants, animals, and habitats. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable, off-site mitigation through habitat creation and/or acquisition should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and non-wasting endowment to a qualified entity for long-term management and monitoring.

9) Long-term Management of Mitigation Lands. For proposed mitigation lands, the DEIR should include measures to protect these lands in perpetuity. The mitigation should offset all biological resources impacts associated with the Project. Issues that should be addressed in a long-term management plan include (but are not limited to) restrictions on public access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be established to provide for long-term management of mitigation lands.

10) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant. Take of any endangered, threatened, candidate species, or NPPA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity will result in the take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project Proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an ITP or a consistency determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit.

To ensure CDFW will be able to use SANDAG's CEQA document for the issuance of an ITP, the DEIR should address all Project impacts to CESA-listed species and

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specify a mitigation, monitoring, and reporting program that will meet the requirements of an ITP.

11) Translocation of Plants and Animal Species. Translocation or relocation is the process of removing plants and wildlife from one location and permanently moving them to a new location. CDFW generally does not support the use of translocation or relocation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. Studies have shown that these efforts are often ineffective without long-term monitoring to assess the fate of the efforts. CDFW has found that permanent preservation and management of habitats capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.

12) Scientific Collecting Permit and Voucher Collecting Permit. A Scientific Collecting Permit is necessary to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor project impacts to wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see CDFW's Scientific Collecting Permits webpage[14].

    A voucher collection permit is required to collect state-listed plant species for identification purposes during field surveys, or to collect voucher specimens to document a newly discovered or previously unvouchered occurrence of a state-listed plant. There is no charge to apply for a voucher collection permit. Anyone who collects scientific plant specimens of state-listed species, or who may encounter a state-listed species during field surveys should have a plant voucher collection permit. To apply for a Voucher Collecting Permit please see CDFW's Voucher Collecting Permit Page[15].

13) Use of Native Plants and Trees. CDFW recommends SANDAG utilize a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts to biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project, especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for

[14] https://wildlife.ca.gov/Licensing/Scientific-Collecting
[15] https://wildlife.ca.gov/Conservation/Plants/Permits

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landscaping and restoration, particularly any species listed as 'Moderate', 'High', 'Limited', and 'Watch' by the California Invasive Plant Council[16]. CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* spp.), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value, including a variety of native annual and perennial species with overlapping bloom periods from February through November.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[17] provides directions regarding the types of information that should be reported and allows on-line submittal of field survey forms. In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[18].

SANDAG should ensure data collected for the preparation of the DEIR is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the Updated NOP to assist SANDAG in identifying and mitigating Project impacts on biological resources. Questions

[16] https://www.cal-ipc.org/plants/inventory/
[17] https://wildlife.ca.gov/Data/CNDDB
[18] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

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regarding this letter or further coordination should be directed to Heather Schmalbach[19], Senior Environmental Scientist.

Sincerely,

DocuSigned by:
B6E58CFE24724F5...

Erinn Wilson-Olgin
Regional Manager
South Coast Region

ATTACHMENTS

Attachment A: Sensitive species with potential to occur on the Project site
Attachment B: 2023 Light-footed Ridgway's Rail Survey Results (AECOM)

ec: California Department of Fish and Wildlife
Erinn Wilson-Olgin, Regional Manager
Glen M. Lubcke, Environmental Program Manager
Melanie Burlaza, Senior Environmental Scientist (Supervisory)
Jennifer Turner, Senior Environmental Scientist (Supervisory)
Eric Wilkins, Marine Region, Senior Environmental Scientist (Supervisory)
Leslie Hart, Marine Region, Environmental Scientist
Jason Price, Senior Environmental Scientist (Supervisory)
Gabriel Penaflor, Reserve Manager

U.S. Fish and Wildlife Service
Jonathan Snyder, jonathan_d_snyder@fws.gov
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Office of Planning and Research
State Clearinghouse - state.clearinghouse@opr.ca.gov

References:

[AECOM] AECOM. October 4, 2023. 2023 Light-footed Ridgway's Rail, Coastal California Gnatcatcher, Least Bell's Vireo, and Southwestern Willow Flycatcher Summary Report for the SANDAG San Dieguito to Sorrento Valley Double Track Project, San Diego County, California.
[CDFWa] California Department of Fish and Wildlife. 2022. Lake and Streambed Alteration Program. Available from: https://wildlife.ca.gov/Conservation/LSA.

[19] Phone: 858-775-7399; Email: heather.schmalbach@wildlife.ca.gov

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Attachment A: Sensitive species with potential to occur on the Project site[20]

Invertebrates:

- American bumble bee (*Bombus pensylvanicus*; SR-S2)
- Crotch's bumble bee (*Bombus crotchii;* candidate CESA listing)
- Monarch butterfly (*Danaus plexippus plexippus*; proposed ESA-threatened, SR-S2)
- Sandy beach tiger beetle (*Cicindela hirticollis gravida*; SR-S2)
- Senile tiger beetle (*Cicindela senilis frosti*; SR-S1)
- Wandering (saltmarsh) skipper (*Panoquina errans*; SR-S2)
- Western beach tiger beetle (*Cicindela latesignata*; SR-S1)

Amphibians:

- Western spadefoot (*Spea hammondii*; proposed ESA-threatened, SSC)

Reptiles:

- California glossy snake (*Arizona elegans occidentalis*; SSC)
- Coast horned lizard (*Phrynosoma blainvillii*; SSC)
- Coastal whiptail (*Aspidoscelis tigris stejnegeri*; SSC)
- Coronado skink (*Plestiodon skiltonianus interparietalis*; WL)
- Northern red diamond rattlesnake (*Crotalus ruber ruber*; SSC)
- Orange-throated whiptail (*Aspidoscelis hyperythra*; WL)
- San Diego ringneck snake (*Diadophis punctatus similis*)
- Southern California legless lizard (*Anniella stebbinsi*; SSC)
- Two-striped garter snake (*Thamnophis hammondii*; SSC)

Birds:

- Belding's savannah sparrow (*Passerculus sandwichensis beldingi;* CESA-endangered)
- Black skimmer (*Rynchops niger*; BCC, SSC)
- California least tern (*Sternula antillarum browni;* ESA- and CESA-endangered; FP)
- Clark's marsh wren (*Cistothorus palustris clarkae*; SSC)

[20] Nomenclature and species status follows the CNDDB Special Animals List (CDFW, April 2025) and Special Vascular Plants, Bryophytes, and Lichens List (CDFW, April 2025). ESA = Federal Endangered Species Act, BCC = Federal Bird of Conservation Concern, CESA = California Endangered Species Act, SSC = state Species of Special Concern, FP = state Fully Protected, WL = CDFW Watch List, SR = NatureServe State Ranking [S1: Critically Imperiled; S2: Imperiled], CRPR = California Rare Plant Rank.

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- Coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis;* SSC)
- Coastal California gnatcatcher (*Polioptila californica californica;* ESA-threatened, SSC)
- Cooper's hawk (*Accipiter cooperi*; WL)
- Elegant tern (*Thalasseus elegans*; BCC, WL)
- Least Bell's vireo (*Vireo bellii pusillus;* ESA- and CESA-endangered)
- Light-footed Ridgway's rail (*Rallus obsoletus brevipes;* ESA- and CESA-endangered, FP)
- Northern harrier (*Circus hudsonius*; BCC, SSC)
- Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*; WL)
- Western snowy plover (*Charadrius nivosus nivosus*; ESA-threatened, SSC)
- White-faced ibis (*Plegadis chihi*; WL)
- White-tailed kite (*Elanus leucurus*; FP)
- Yellow warbler (*Setophaga petechia*; SSC)
- Yellow-breasted chat (*Icteria virens*; SSC)

Mammals:

- Northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*)
- Pacific pocket mouse (*Perognathus longimembris pacificus*; SSC)
- Pocketed free-tailed bat (*Nyctinomops femorosaccus*; SSC)
- San Diego desert woodrat (*Neotoma lepida intermedia*; SSC)
- Southern mule deer (*Odocoileus hemionus fuliginata*)

Plants:

- *Acmispon prostratus* [= *Lotus nuttallianus*] (Nuttall's acmispon; CRPR 1B.1)
- *Aphanisma blitoides* (aphanisma; CRPR 1B.2)
- *Arctostaphylos glandulosa* ssp*. crassifolia* (Del Mar manzanita; ESA-listed endangered, CRPR 1B.1)
- *Astragalus tener* var*. titi* (coastal dunes milk-vetch; ESA- and CESA-endangered, CRPR 1B.1)
- *Atriplex pacifica* (south coast saltscale; CRPR 1B.2)
- *Bacharris vanessae* (Encinitas baccharis; ESA-threatened, CESA-endangered, CRPR 1B.1)
- *Berberis nevinii* (Nevin's barberry; ESA-endangered, CESA-endangered, CRPR 1B.1)
- *Ceanothus verrucosus* (wart-stemmed ceanothus; CRPR 2B.2)
- *Ceanothus cyaneus* (Lakeside ceanothus; CRPR 1B.2)

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- *Centromadia parryi* ssp*. australis* (southern tarplant; CRPR 1B.1)
- *Chaenactis glabriuscula* var. *orcuttiana* (Orcutt's pincushion; CRPR 1B.1)
- *Chloropyron maritimum* ssp. *maritimum* [= *Cordylanthus maritimus* ssp. *maritimus*] (salt marsh bird's-beak; ESA- and CESA-endangered, CRPR 1B.2)
- *Chorizanthe orcuttiana* (Orcutt's spineflower; ESA- and CESA-endangered, CRPR 1B.1)
- *Comarostaphylis diversifolia* ssp*. diversifolia* (summer holly; CRPR 1B.2)
- *Corethrogyne filaginifolia* var. *linifolia* (Del Mar Mesa sand aster; CRPR 1B.1)
- *Dudleya brevifolia* (short-leaved dudleya; CESA-endangered, CRPR 1B.1)
- *Dudleya viscida* (sticky dudleya; CRPR 1B.2)
- *Erysimum ammophilum* (sand-loving wallflower; CRPR 1B.2)
- *Euphorbia misera* (cliff spurge; CRPR 2B.2)
- *Ferocactus viridescens* (coast barrel cactus; CRPR 2B.1)
- *Heterotheca sessiflora* ssp. *sessiflora* (beach goldenaster; CRPR 1B.1)
- *Isocoma menziesii* var. *decumbens* (decumbent goldenbush; CRPR 1B.2)
- *Iva hayesiana* (San Diego marsh-elder; CRPR 2B.2)
- *Juglans californica* (southern California black walnut; CRPR 4.2)
- *Juncus acutus* ssp. *leopoldii* (southwestern spiny rush; CRPR 4.2)
- *Lasthenia glabrata* ssp*. coulteri* (Coulter's goldfields; CRPR 1B.1)
- *Leptosyne maritima* [= *Coreopsis maritima*] (sea dahlia; CRPR 2B.2)
- *Nemacaulis denudata* var*. denudate* (coast woolly-heads; CRPR 1B.2)
- *Phacelia stellaris* (Brand's star phacelia; CRPR 1B.1)
- *Pinus torreyana* ssp. *torreyana* (Torrey pine; CRPR 1B.2)
- *Quercus dumosa* (Nuttall's scrub oak; CRPR 1B.1)
- *Senecio aphanactis* (chaparral ragwort; CRPR 1B.2)
- *Suaeda esteroa* (estuary seablite; CRPR 1B.2)

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Attachment B: 2023 Light-footed Ridgway's Rail Survey Results (AECOM)

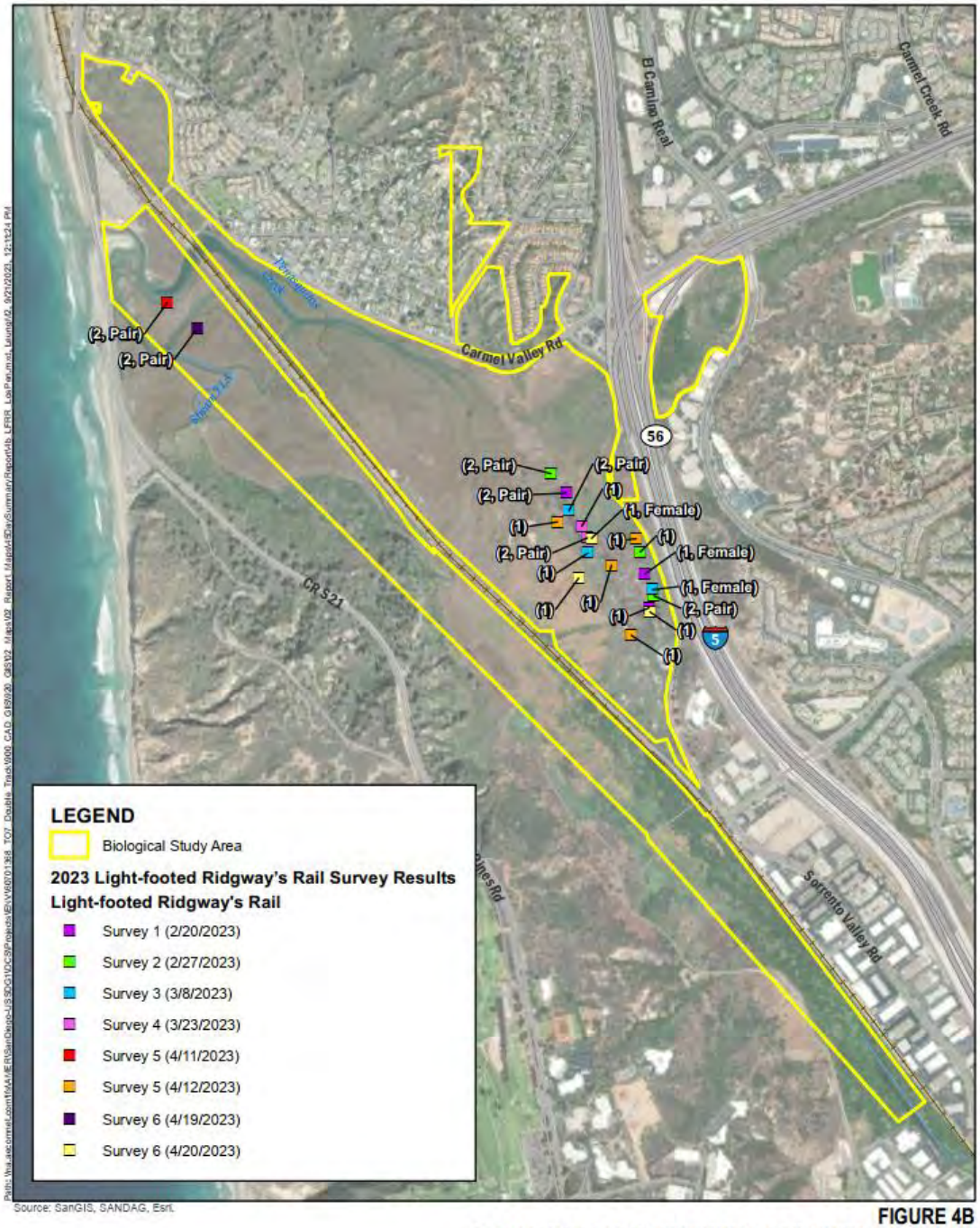

FIGURE 4B
2023 LIGHT-FOOTED RIDGWAY'S RAIL SURVEY RESULTS
(LOS PEÑASQUITOS LAGOON)
SUMMARY REPORT FOR THE SAN DIEGUITO
TO SORRENTO VALLEY DOUBLE TRACK PROJECT
DATE: 9/21/2023

Attachments: image001.png
2025_CSP_Letter_ SANDAG SDLRR Updated NOP_FINAL.pdf

From: Ahmad, Marya@Parks <Marya.Ahmad@parks.ca.gov>
Sent: Monday, June 30, 2025 6:43:28 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Adams, Lisa@Parks <Lisa.Adams@parks.ca.gov>; Van Doren, Nicole@Parks <Nicole.VanDoren@parks.ca.gov>; Homer, Sean@Parks <Sean.Homer@parks.ca.gov>; Smith, Darren@Parks <Darren.Smith@parks.ca.gov>; Tobias, Kathryn@Parks <Kathryn.Tobias@parks.ca.gov>; Benner, Carrie@Parks <Carrie.Benner@parks.ca.gov>; Stupaczuk, Monica@Parks <Monica.Stupaczuk@parks.ca.gov>; Yanez, Ariana@Parks <Ariana.Yanez@parks.ca.gov>; Mike Hastings <mikehastings1066@gmail.com>
Subject: SDLRR Project NOP

Good morning,

Please accept the attached California State Parks comment letter for the Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the LOSSAN SDLRR Project.

Thank you,

Marya Ahmad
District Environmental Coordinator
Department of Parks & Recreation | San Diego Coast District
4477 Pacific Highway, San Diego, CA 92110
Office: (619) 688-3395
Cell: (619) 780-1024 - preferred

Docusign Envelope ID: 064E5622-DCBB-4E12-8963-07BFD9342F92

State of California • Natural Resources Agency — Gavin Newsom, *Governor*
DEPARTMENT OF PARKS AND RECREATION — Armando Quintero, *Director*
San Diego Coast District
4477 Pacific Highway
San Diego, CA 92110
(619) 688-3260 FAX (619) 688-3229

June 30, 2025

Tim Pesce
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
LOSSANcorridor@sandag.org

RE: Updated Notice of Preparation for the San Diego-Los Angeles-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project.

Dear Mr. Pesce,

Thank you for the opportunity to comment on the Updated Notice of Preparation for the San Diego-Los Angeles-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project Draft Environmental Impact Report. California State Parks (CSP) is a Trustee Agency having jurisdiction over natural resources that are held in trust for the people of California, and which may be affected by a project (CCR § 15386). The Mission of CSP, in part, provides for the protection of natural and cultural resources and recreational opportunities. CSP is the landowner and manager for Torrey Pines State Beach (TPSB) and Torrey Pines State Natural Reserve (TPSNR; PRC § 5019.65) which includes Los Peñasquitos Marsh Natural Preserve (LPMNP; PRC § 5019.71). State Natural Reserves have outstanding or unusual natural or scenic value and are managed to limit development to those that support natural resource preservation (PRC § 5019.65).

Land included within TPSNR and TPSB will likely be affected by each of the four project alignments. In general, all four alternatives would involve potential impacts to coastal habitats, cultural resources, public viewsheds, and public access and recreation; changes in noise, vibration, and lighting; and potential pollution from fuel, braking, or accidental spills. The EIR (and subsequent EIS) should also consider how the US Department of Transportation Act of 1966 and 4(f) Rule (49 U.S.C. §303 and 23 U.S.C.) and State Natural Preserve (PRC § 5019.65) designation affects the selection of preferred alternatives. The “San Dieguito Bridge to I-5 Knoll” Alternative Alignment would appear to have the least impact on State Park Trustee land, while the “Under Camino Del Mar” and “Del Mar Bluffs Double Track Reinforced” Alternatives would likely result in the greatest impact to State Park land and require a more complex environmental analysis and mitigation framework.

This project presents a unique opportunity for SANDAG to undertake sustainable long-term planning and to lead the way on managed retreat for the region. Keeping the railroad in its current configuration would bring on another lifetime of continued and increased impacts on TPSB and TPSNR, the costs of which are ultimately borne by the public. We look forward to coordinating with SANDAG on this important effort and are open to participating on any technical advisory group as the project moves forward.

The Updated NOP includes a significant departure from the previously stated goal of this project to relocate the railroad tracks away from the bluffs. In our prior letter to the SANDAG Board

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dated February 27, 2025, we requested that SANDAG maintain the original project objective of relocating the existing railroad tracks away from the eroding coastal bluffs. We also requested that the "Del Mar Bluffs Double Track Reinforced" Alternative be removed from consideration. CSP is opposed to this alternative due to the permanent impacts it would have on cliff and beach habitat, sand supply, emergency vehicle access, and public access and recreation at TPSB. Maintaining a beach here after the installation of approximately 1.5 miles of approximately 20 ft. high seawalls would likely require routine beach nourishment, as stated in the Post Value Analysis Study Assessment. However, beach nourishment does not seem to be a feasible solution given the site constraints and the proximity to Los Peñasquitos Marsh Natural Preserve, which already faces challenges due to surrounding development in addition to imported beach sand. Construction and maintenance of the alternative would very likely require a right-of-entry permit to TPSB in order to access the beach fronting the bluffs and use the North Day Use Lot for staging, as is typically done for SANDAG's bluff stabilization projects.

Project Goals and Objectives

As previously stated, we requested in our February 27, 2025 letter that SANDAG maintain the original project objective of relocating the existing railroad tracks away from the eroding coastal bluffs. This project presents an unprecedented opportunity to relocate an essential rail service away from coastal bluffs, which undergo episodic erosion and also provide an important source of sand supply to beaches. The most feasible way to ensure resilience of the railway while minimizing impacts to coastal habitats and public access and recreation is to relocate it away from the bluffs, and we once again request that this is clearly stated in the project objectives. This approach also needs to be one of the alternatives considered in the EIR, at a level that would suffice for this alternative to be chosen as the revised project.

We strongly support the project objective to "avoid and/or minimize negative effects, and where possible enhance biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places." The alternatives should be thoroughly analyzed with respect to this objective, including how they will or will not avoid, minimize, or enhance the biological, cultural, and recreational resources of TPSB, TPSNR, and LPMNP. More detailed considerations are listed below.

Finally, we appreciate that the final project objective considers maintenance costs. We request that these maintenance costs are thoroughly outlined and considered for the lifetime of the "Del Mar Bluffs Double Track Reinforced" alternative. These costs should include the beach nourishment required to mitigate for impacts to TPSB, the increased inlet maintenance required due to beach nourishment, the loss of public beach access during seawall construction and routine maintenance, the loss of sandy beach area due to decreased sand supply, and the loss of potential future beach area given projected sea level rise. SANDAG's coastal monitoring reports and draft economic analysis for Regional Beach Sand Project III could be used in this analysis to assess the cost of the loss of public beach space at TPSB.

EIR Considerations

<u>All Alternatives</u>

For each alternative, the EIR should consider potential impacts to sensitive habitats (e.g., southern foredune, southern willow scrub, riparian, tidal and non-tidal saltmarsh, freshwater emergent wetland, wetland transitional habitat, southern maritime chaparral, coastal sage scrub, coastal succulent scrub, mudflat, salt flat and salt panne, and others) and their associated special-status species (e.g., light-footed Ridgway's rail [*Rallus obsoletus levipes*], Belding's savannah sparrow [*Passerculus sandwichensis beldingi*], coastal California gnatcatcher [*Polioptila californica californica*], least Bell's vireo [*Vireo bellii pusillus*], western snowy plover

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[*Charadrius nivosus nivosus*], California least tern [*Sternula antillarum browni*], white-tailed kite [*Elanus leucurus*] and other raptors, yellow-breasted chat *[Icteria virens*], yellow warbler [*Setophaga petechia*], northwestern San Diego pocket mouse [*Chaetodipus fallax fallax*], red-diamond rattlesnake [*Crotalus ruber*], two-striped gartersnake [*Thamnophis hammondii*], San Diego ringneck snake [*Diadophis punctatus similis*], Southern California legless lizard [*Anniella stebbinsi*], coast horned lizard [*Phrynosoma blainvillii*], coastal whiptail [*Aspidoscelis tigris stejnegeri*], orange-throated whiptail [*Aspidoscelis hyperythra*], Coronado skink [*Plestiodon skiltonianus interparietalis*], wandering skipper [*Panoquina errans*], Coulter's goldfields [*Lasthenia glabrata* ssp. c*oulteri*], Nuttall's acmispon [*Acmispon prostratus*], Orcutt's pincushion [*Chaenactis glabriuscula* var. o*rcuttiana*], coast woolly-heads [*Nemacaulis denudata* var. d*enudata*], San Diego Marsh elder [*Iva hayesiana*], San Diego sagewort [*Artemisia palmeri*], southwestern spiny rush [*Juncus acutus* ssp. *leopoldii*], and others). The EIR should also answer the question to what effect will the increased rail traffic and speed impact southern mule deer, coyote, and bobcat. These important mammals are likely subject to inbreeding from poor connectivity and increased rail strikes.

Furthermore, the EIR should consider changes to local hydrology from the proposed infrastructure (e.g., rail widening, floodwalls, U-sections, and cut-and-cover features) and their effect on sedimentation and the balance of halophytic and freshwater habitats. Additionally, the EIR should consider the effects of noise, vibration, lighting, and rail-related pollution associated with the new infrastructure and increased rail speed and volume of rail traffic. Because the "Under Crest Canyon" alternative would tunnel directly under portions of TPSNR (the LPMNP and the Reserve Extension), the EIR should carefully analyze the noise, vibration, groundwater, and seismic changes that may affect the habitats, wildlife, and visitor experiences with respect to State Park Property. The EIR should also include impacts associated with the removal of railway infrastructure (e.g. within LPMNP or along the bluffs adjacent to TPSB).

The EIR should also consider impacts to archaeological and historical sites, and cultural landscapes. The areas containing the alternative alignments support archaeological resources and potentially historically significant landscapes and features. Careful consideration must be given to avoiding impacts to cultural and tribal resources. Any potential impacts to the viewshed of cultural landscapes, archaeological and historical sites will need to be reviewed and assessed by Registered Professional Archaeologist (RPA) and Tribal Governments. Tribal consultation is required to be in compliance with AB 52. To obtain a list of Tribal Governments to consult, please contact the Native American Heritage Commission (NAHC). Any ground disturbance within a cultural landscape, archaeological, or historical site needs to have a Native American Monitor (NAM) that will be chosen through the Tribal consultation processes. If excavation within cultural resources is necessary, the loss of cultural landscape, archaeological, and historical sites is irreplaceable and severely impacts the history within the area. We would highly recommend that any alternative alignments that have planned tunnels abide by the Paleontological Resources Preservation Act of 2009 (16 U.S.C. § 470aaa 1-11) due to the potential to encounter paleontological sites within the alternative alignments. A significant effect on the environment is defined under CEQA as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance" (CEQA Guidelines Section 15382). If a unique paleontological resource or site or unique geologic feature would be disturbed or destroyed, the impacts must be analyzed to determine if they are significant under CEQA.

<u>"San Dieguito Bridge to I-5 Knoll" and "Under Crest Canyon" Alternative Alignments</u>
Two of the tunnel alternatives, "San Dieguito Bridge to I-5 Knoll" and "Under Crest Canyon", minimize proximity to TPSNR (including the LPMNP) and likely minimize potential impacts to this and adjacent land. Although these alignments would avoid much of the Reserve, a small

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portion of adjacent wetland and upland habitat may be affected. Therefore, the considerations listed above should be analyzed. Because the "Under Crest Canyon" alternative would tunnel directly under portions of TPSNR (the LPMNP, and the Reserve Extension), the EIR should carefully analyze the noise, vibration, groundwater, and seismic changes that may affect the habitats, wildlife, cultural resources, and visitor experiences with respect to State Park Property.

"Under Camino Del Mar" and "Del Mar Bluffs Double Track Reinforced" Alternative Alignments
Both the "Under Camino Del Mar" and "Del Mar Bluffs Double Track Reinforced" alternatives maintain the current alignment through TPSNR including the LPMNP. A portion of the current alignment is owned by the rail and a portion is a right-of-way owned by California State Parks. These alignments include expanding the width and height of the existing rail embankment within the LPMNP to accommodate double tracking and sea level rise. The "Under Camino Del Mar" alternative would include bridging a portion of the northwestern alignment over TPSNR before entering the Torrey Pines Road West South Portal. The "Del Mar Bluffs Double Track Reinforced" alternative would construct a second railroad track adjacent to the existing line on the Del Mar Bluffs adjacent to Torrey Pines State Beach and would require approximately 1.5 miles of seawalls of up to 20 ft. in height.

These alignments maintain the most proximity to State Property and likely will result in significant impacts to upland, wetland, and beach habitats and species within and adjacent to TPSNR and TPSB. The alignments will involve the construction and placement of new embankment and bridging in the northwestern portion of the Reserve. The EIR must carefully analyze the effects of this new infrastructure, including wetland habitat loss, hydrologic impairment, impacts on special-status plant and animal species including those listed above, increased potential for non-native species, noise, vibration, habitat fragmentation, visual impacts, and disruption of public access to the Torrey Pines North Beach Parking lot and adjacent beach, including how the US Department of Transportation Act of 1966 and 4(f) Rule (49 U.S.C. §303 and 23 U.S.C.) applies. The EIR should also analyze the impacts associated with the increase in train trips through LPMNP that will be facilitated by the proposed double tracking. Selection of either alternative would represent the loss of an extraordinary opportunity for restoring the rare and sensitive habitats within LPMNP and improving public access and viewsheds.

Finally, the EIR must thoroughly analyze the impacts to sand supply, beach width, emergency vehicle access, public beach access and recreation, and beach ecology associated with the "Del Mar Bluffs Double Track Reinforced" alternative. The Post Value Analysis Study Assessment states that this alternative would require routine beach replenishment if the beach is to be preserved and could require ongoing or emergency bluff stabilization maintenance. The potential impacts and costs of this routine beach nourishment and bluff stabilization maintenance should be analyzed in the EIR. The analysis should include anticipated TPSB closures and resulting public access impacts associated with maintenance and repair for the lifetime of the seawalls; impacts of construction, maintenance, and potential beach nourishment to California grunion and other species dependent on sandy beaches; impacts of beach nourishment to Los Peñasquitos Lagoon (i.e., increased inlet closures); anticipated loss of sand supply, the resulting loss of beach space, and the potential impacts on emergency vehicle access, public beach access and recreation, and beach ecology at TPSB; and how these impacts will be exacerbated by projected sea level rise. The costs of ongoing maintenance of the seawalls, routine beach nourishment for the lifetime of the seawalls, and mitigation and long-term maintenance requirements for lagoon impacts should be considered when analyzing this alternative's ability to meet the project objective of demonstrating good public stewardship in a way that considers maintenance costs. We are particularly concerned about the potential increased costs of inlet maintenance at Los Peñasquitos Lagoon as a result of beach nourishment. This alternative could strongly alter the existing maintenance regime of Los Peñasquitos Lagoon, and the cost of this (i.e., the need for repeated and more extensive lagoon dredging) is required to be included in SANDAG's analysis of the alternative. On the other hand,

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the loss of sandy beach at this stretch of TPSB would be an extraordinary loss to the public that should be analyzed in the EIR.

Thank you for the opportunity to comment on the NOP for the San Diego-Los Angeles-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project Draft Environmental Impact Report. Please feel free to contact me for further discussion of our concerns.

Sincerely,

Signed by:
Lisa Adams
04D9616D2DCF4F6...

Lisa Adams
Deputy District Superintendent
Lisa.Adams@parks.ca.gov

Ec'd

Nicole Van Doren, Chief Ranger
Sean Homer, Sector Superintendent
Darren Smith, Senior Environmental Scientist
Kathryn Tobias, Senior Counsel
Carrie Benner, Environmental Scientist
Monica Stupaczuk, Environmental Scientist
Ariana Yanez, Assistant State Archaeologist, Acting Tribal Liaison
Marya Ahmad, Park and Recreation Specialist
Mike Hastings, Executive Director Los Peñasquitos Lagoon Foundation

Attachments: image001.png
image002.png
image003.png
image004.png
06.30.2025 SANDAG LOSSAN Project NOP_Final Comment Letter.pdf

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From: Davis, Alex <Alex.Davis@sen.ca.gov>
Sent: Monday, June 30, 2025 9:30:38 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: San Diego LOSSAN Rail Realignment Project - Comments

On behalf of State Senator Catherine Blakespear, please see the attached comments regarding the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the San Diego LOSSAN Rail Realignment project.

Sincerely,
Alex Davis

Alex Davis
Principal Consultant
Senator Catherine Blakespear | 38th District
(949) 598-5850

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SENATOR.BLAKESPEAR@SENATE.CA.GOV
WWW.SENATE.CA.GOV/BLAKESPEAR

California State Senate

SENATOR CATHERINE BLAKESPEAR

THIRTY-EIGHTH SENATE DISTRICT

STANDING COMMITTEES
ENVIRONMENTAL QUALITY
CHAIR
BUDGET AND FISCAL REVIEW
GOVERNMENTAL ORGANIZATION
TRANSPORTATION

SUBCOMMITTEES
BUDGET SUBCOMMITTEE #2:
RESOURCES, ENVIRONMENTAL PROTECTION AND ENERGY
LOSSAN RAIL CORRIDOR RESILIENCY
CHAIR

JOINT COMMITTEES
CLIMATE CHANGE POLICIES

June 30, 2025

San Diego Association of Governments (SANDAG)
Attn: LOSSAN Comments
1011 Union Street, Ste 400
San Diego, CA 92101
Email: lossancomments@sandag.org
VIA EMAIL ONLY

Re: Comments Regarding the Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the San Diego LOSSAN Rail Realignment Project Released May 16, 2025

To Whom It May Concern:

Thank you for the opportunity to comment on the Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the San Diego LOSSAN Rail Realignment Project. The preparation of a DEIR is an important step in identifying a long-term solution for the Los Angeles – San Diego – San Luis Obispo (LOSSAN) rail corridor currently operating on fragile coastal bluffs. This sensitive operating environment requires responsible stakeholders to work collaboratively and with a sense of urgency toward a solution. Without action, natural resources and public infrastructure are at risk as coastal hazards become increasingly severe and frequent. I fully support the completion of appropriate environmental documents needed to identify a safe alternative route for the railroad.

This proposed project is needed to ensure the safety and continued operation of rail services. Failure to act will result in additional emergency projects and the continued reliance on short-term stabilization efforts. This rail line provides an important public service that is integral to our local, regional, state and national public interests and therefore it's crucial that we protect it.

As Chair of the Senate Transportation Subcommittee on LOSSAN Rail Corridor Resiliency, I am well aware of the challenges the line faces – and the difficulties and complexities to address them. We have a delicate balancing act to maintain and reinforce rail infrastructure while at the same time protecting and respecting the coast's precious environmental resources. But just because it's difficult, and requires tough choices, doesn't mean we shouldn't act, and act with urgency. This important environmental document process exists to bring all interested stakeholders together, collect all the relevant information and reach a solution that's in the public's best interest.

As noted in my letter of July 19, 2024, I recognize that there are many passionate and different opinions about this project. I encourage us all to remember the importance of strategic and bold action. We have a process before us that will inform the public and decision makers about the best available data, science and engineering standards. We should trust the process and its result. We must act before we face potentially more serious consequences of inaction.

Sincerely,

SENATOR CATHERINE BLAKESPEAR

SENATE DISTRICT 38

Cc: Hon. Mike Levin, United States Representative, 49th District
Hon. Bob Archuleta, State Senator, 30th District
Hon. Sabrina Cervantes, State Senator, 31st District
Hon. Monique Limón, State Senator, 19th District
Hon. Tony Strickland, State Senator, 36th District
Hon. Thomas Umberg, State Senator, 34th District
Hon. Tasha Boerner, State Assemblymember, 77th District
Hon. Terry Gaasterland, Mayor, City of Del Mar
Hon. Todd Gloria, Mayor, City of San Diego
Carlene Moore, CEO, 22nd District Agricultural Association

Attachments: image002.png
image003.png
ENVR 20250500004CPUC comment LOSSAN SDLRR Project_SCH2024060038.pdf

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From: Huie, Howard <howard.huie@cpuc.ca.gov>
Sent: Friday, June 13, 2025 2:20 PM
To: Tim Pesce <tpe@sandag.org>
Cc: 'state.clearinghouse@opr.ca.gov' <state.clearinghouse@opr.ca.gov>; Scott Shroyer <sshroyer@nctd.org>; Truong, Anh <Anh.Truong@cpuc.ca.gov>
Subject: LOSSAN Rail Project, SCH# 2024060038

Mr. Tim Pesce,

Regarding the LOSSAN SDLRR Project, please see the attached letter for our comments and concerns.

Please do not hesitate to call if you have any questions.

Thanks,

Howard Huie
Utilities Engineer
Rail Crossings & Engineering Branch - Rail Safety Division
California Public Utilities Commission
320 W 4th St, Suite 500 | Los Angeles, CA 90013
☎ (415) 308-0533

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STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

June 11, 2025 ENVR 20250500004

Tim Pesce
San Diego Association of Government
1011 Union Street, Suite 400
San Diego, CA 92101

Re:
Updated NOP of a Draft EIR for the LOSSAN SDLRR Project SCH 2024060038 — *Notice of Preparation*

Dear Tim Pesce:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) and Rail Operation and Safety Branch (ROSB) is in receipt of the *Updated Notice of Preparation of a Draft EIR (NOP)* for the LOSSAN SDLRR Project. The San Diego Association of Government (SANDAG) is the lead agency.

The Project Applicant proposes to improve the resiliency and reliability of the segment of the LOSSAN Corridor (Corridor) from the City of Del Mar to the City of San Diego, where the Corridor along the costal bluffs is eroding. Several alternatives have been presented for further evaluation. Several the alternatives provide an underground tunnel. Tunnel designs need to meet or exceed the minimum horizontal and vertical clearance requirements prescribed in CPUC General Order (GO) 26-D and walkway requirements prescribed in GO 118-A.

Beyond the tunnel limits, including tunnel portals, several of the alignments are shown to cross over existing roadways, that are not existing railroad crossings (e.g. Jimmy Durante Blvd on the "San Dieguito Bridge to I-5 Alternative Alignment"). Such crossings will need to be authorized by the Commission through a formal application.

Where the alignment traverses over an existing crossing and modifications are proposed to the crossing, a GO 88-B request will need to be submitted to RCEB for authorization. (e.g. the realignment of the tracks over the McGonigle Rd grade separated crossing on the "Under Camino Del Mar Alternative Alignment" and trenching of Coast Blvd on the "Del Mar Bluffs Double Track Reinforced Alternative Alignment").

Specifically, for the "Del Mar Bluffs Double Track Reinforced Alternative Alignment", any improvements in this area along the bluffs needs to consider safe pedestrian access for the public across the railroad corridor.

If you have any questions, please contact Howard Huie at (415) 308-0533, or howard.huie@cpuc.ca.gov regarding any crossing related questions or concerns, and Matthew Cardiff at (213) 308-4083 or matthew.cardiff@cpuc.ca.gov regarding any tunnel or other railroad related questions or concerns.

Sincerely,

Anh Truong, P.E.
Senior Utilities Engineer (Supervisor)
Rail Crossings Engineering Branch
Rail Safety Division

CC: State Clearinghouse, state.clearinghouse@opr.ca.gov
Scott Shroyer, NCTD, sshroyer@nctd.org

Attachments: image003.png
CCC Comments on Updated NOP_SD-LOSSAN Rail Realignment.pdf

From: Christensen, Deanna@Coastal <Deanna.Christensen@coastal.ca.gov>
Sent: Tuesday, June 24, 2025 10:24:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Tim Pesce <timothy.pesce@sandag.org>
Subject: SDLRR Project NOP

Please see our attached comment letter regarding the Updated NOP for the SDLRR Project.
Thanks for your consideration!

Thank you,
Deanna

Deanna Christensen
California Coastal Commission
Environmental Scientist
Energy, Ocean Resources, and Federal Consistency
deanna.christensen@coastal.ca.gov

CALIFORNIA COASTAL COMMISSION
ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
VOICE (415) 904-5200

June 24, 2025

SANDAG
Attn: LOSSAN Comments
401 B Street, Suite 800
San Diego, CA 92101
Via email to: LOSSANcomments@sandag.org

Re: Updated Notice of Preparation of a Draft Environmental Impact Report for the SD-LOSSAN Rail Realignment (SDLRR) Project

Dear Board of Directors:

California Coastal Commission (Commission) staff appreciates the opportunity to provide comments on the Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the SDLRR Project. As detailed in the NOP, the existing SD-LOSSAN alignment on the Del Mar bluffs has experienced bluff collapses and erosion that have required emergency and repair work to stabilize the bluffs and protect the rail corridor. Four bluff stabilization projects have been completed in Del Mar since 2003, with the construction of Phase 4 recently completed in 2021. The Phase 5 stabilization project began construction in spring 2024 and addresses safety and operational concerns with a 30-year design life. As acknowledged in the NOP, the stabilization projects and emergency repairs do not provide a long-term solution for sea level rise and the ongoing coastal erosion that pose substantial safety and economic risks to the region. The repeated repairs have caused impacts to public access and recreation, visual resources, biological resources, and the natural sand transport system, and if maintained indefinitely, the seawalls protecting the rail corridor will contribute to “coastal squeeze” and a loss of usable beach area and coastal public access opportunities.

In addition to the three tunnel alignment alternatives that were described in the previous June 2024 NOP, with some refinements, the Updated NOP now includes a non-tunnel alignment alternative (Del Mar Bluffs Double Track Reinforced), and a “no project” alternative. All of the alternatives would be located within the coastal zone. Because the Del Mar Bluffs Double Track Reinforced is a newly added alternative not previously considered, it will be our focus in this letter.

The Del Mar Bluffs Double Track Reinforced Alternative would involve construction of a second railroad track adjacent to the existing line on the Del Mar bluffs, along with new and expanded bluff stabilization and shoreline protective devices. As detailed in our February 27, 2025, comments on the project’s Value Analysis Study Report and explained further below, Coastal Commission staff have serious concerns with the Del Mar Bluffs Double Track Reinforced Alternative.

In June 2022, the Commission conditionally concurred with Consistency Certification (CC) No. CC-0005-21 submitted by SANDAG for the Del Mar Bluffs Stabilization Project 5 for

installation of new, and retrofit of existing, bluff stabilization infrastructure and drainage systems, access road enhancements, and public access improvements. The project also included after-the-fact authorization for emergency repair projects at Mile Post 245.2 and Anderson Canyon. In the application submittal to the Commission for CC-0005-21, SANDAG stated that it had identified the need for, and begun pursuit of, the relocation of the rail corridor off of the Del Mar bluffs by as soon as 2035, at which point the seawalls proposed as part of the stabilization project would no longer be necessary to protect the rail line and could be removed. This commitment to relocate the rail line off of the bluffs by 2035 was a key part of the Commission's support for the project and concurrence with SANDAG's consistency certification for the ongoing Del Mar Bluffs Stabilization Project 5. Further, it reinforced previous similar commitments made by SANDAG as part of prior bluff stabilization projects reviewed by the Commission, including the Del Mar Bluffs Stabilization Projects 3 and 4. In seeking the Commission's concurrence with those stabilization projects, SANDAG provided the Commission with assurances that they would not lead to double-tracking in-place nor serve as a hurdle to the eventual inland relocation of the track away from the bluffs. Shoreline structures, such as seawalls, generally result in a variety of adverse impacts on coastal resources, including on sand supply, public access and recreation, coastal views, natural landforms, and overall shoreline beach dynamics on- and off-site, ultimately resulting in the loss of beach. In light of these impacts, the Commission staff was only able to recommend concurrence, and the Commission was able to concur, because SANDAG had committed to plan for relocation of the railroad and because SANDAG has designed the seawalls to be removed after relocation was complete. This approach was found to be consistent with the Commission's Sea Level Rise (SLR) Guidance for critical infrastructure.

The Double Track Reinforced Alternative would be in direct conflict with the Commission's actions in CC-0005-21, CC-0004-18, CC-020-10, its SLR Guidance for critical infrastructure, and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls. Condition 1 of CC-0005-21 states that the Commission's authorization of the approved seawalls shall expire 30 years from the date of Commission action (i.e. June 8, 2052), or upon relocation and legal abandonment of the sections of railroad at issue, whichever occurs first. The planned relocation approach is contemplated in SANDAG's 2021 Regional Transportation Plan, draft proposed 2025 Regional Transportation Plan and addressed in the certified North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP) that includes two conceptual rail corridor realignments for a "rail tunnel to move the existing rail alignment away from the Del Mar bluffs, which are susceptible to failure and unable to accommodate double tracking due to significant excavation, stabilization and ongoing maintenance needs of such a facility."

The Double Track Reinforced Alternative would add new and expanded stabilization elements to the Del Mar bluffs, including approximately 1.5 miles of new seawalls on the beach. Such substantial expansion of bluff stabilization infrastructure and shoreline protective devices would result in significant adverse impacts to coastal resources. Shoreline and bluff armoring encroach directly upon valuable beach space, limits natural bluff erosion, and prohibits the landward migration of the shoreline through natural erosion and sea level rise over time, which results in reduced sand supply, public access, and

habitat area. Over the long-term, this approach would likely result in the permanent loss of the beach. Additional grading and steepening of slopes on the inland side of the tracks to accommodate a double-track would lead to more bluff instability and more landform alteration to install adequate stabilization infrastructure. Based on prior analyses of the significant bluff erosion and stability hazards to the existing railroad on the Del Mar bluffs, the addition of a second track there would be inconsistent with Coastal Act Section 30253, which requires that new development minimize risk and assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. Coastal Act Section 30270 also requires that the effects of sea level rise be taken into account. In addition, Coastal Act Section 30235 acknowledges that seawalls, revetments, cliff retaining walls, and other types of shoreline protective devices designed to forestall erosion also alter natural landforms and natural shoreline processes. Accordingly, Section 30235 imposes a limited requirement to approve the construction of shoreline protective works when they are required to serve coastal-dependent uses or to protect only existing structures or public beaches in danger from erosion. The addition of a second track on the bluffs would be considered new development that would not be entitled to shoreline protection pursuant to Coastal Act Section 30235.

For these reasons, Commission staff have serious concerns about the regulatory implications and challenges presented by the Double Track Reinforced Alternative and do not consider it to be viable. We strongly recommend that SANDAG reject this alternative from further consideration in the Draft EIR due to lack of regulatory viability (i.e., inconsistency with the Coastal Act), significant unavoidable environmental impacts, and conflicts with key project objectives including hazard risk minimization, impact avoidance and/or minimization, and coastal access and safety improvement. Given the accelerating effects of climate change and sea level rise and the fragility of the coastal bluffs, it is critical for regional rail infrastructure to be resilient to coastal hazards. This would not be accomplished with the double track alternative but could be achieved by relocating the rail corridor away from the vulnerable Del Mar bluffs through a more inland alignment alternative such as the tunnel alignment alternatives identified in the updated NOP. Such relocation alternatives would include removal of the prior Del Mar bluff stabilization improvements consistent with the Commission's Consistency Certification, which would provide significant coastal resource benefits.

While the Value Analysis Study Report identified the Double Track Reinforced Alternative as the lowest cost compared to other alignments that include tunnel segments, the cost estimates only reflect initial project costs and do not include ongoing operations or maintenance costs. Such a limited cost analysis may be misleading, especially for planning critical infrastructure at ongoing risk from bluff erosion and coastal hazards. The Double Track Reinforced Alternative would be associated with significantly higher costs than those considered in the Value Analysis Study when considering expected ongoing stabilization and maintenance efforts and unexpected emergency repair and response projects, required mitigation, and potential litigation. The updated NOP identifies "good public stewardship" (defined in the NOP as "delivering the project in a timely way that considers prior and ongoing investments, construction, right-of-way, operations, and maintenance costs") as a project objective. However, prior cost and investment associated with maintaining the existing Del Mar bluffs track should not be used to justify maintaining

or improving the tracks in place when long-standing commitments (and associated regulatory approvals) identified inland relocation as the longer term plan for railroad operations through this area and prior stabilization efforts were not to serve as a hurdle to that effort in order to protect public coastal resources consistent with the Coastal Act. We recommend that the "good public stewardship" objective be broadened to account for that and for the costs of addressing impacts to public trust resources.

As our prior July 2024 comments on the original NOP conveyed, the Draft EIR should include a comprehensive analysis of the different alignment alternatives' impacts on coastal resources (e.g., biological resources, marine resources, water quality, public access and recreation, archaeological/paleontological/tribal resources, visual resources, site stability, etc.) and consistency with the Chapter 3 policies of the Coastal Act and the North Coast Corridor PWP/TREP. To maximize protection of sensitive coastal resources, including within Los Peñasquitos and San Dieguito Lagoons, please ensure that robust biological analyses are conducted to characterize the potential for impacts to the Environmentally Sensitive Habitat Areas, wetlands, and sensitive avian species. Of particular concern are the populations of Ridgway's Rails (*Rallus obsoletus*), listed as Endangered under the California Endangered Species Act. Given that some of the project alternatives would be located within or adjacent to lagoons, the Draft EIR should evaluate siting and design alternatives that would avoid or minimize impacts to sensitive lagoon and wetland resources to the maximum extent feasible. The Draft EIR should also evaluate avoidance and minimization measures for construction impacts to sensitive resources, such as avoiding nesting season to the maximum extent feasible or phasing activities with the most potential to adversely impact sensitive avian species, such as pile driving, outside the nesting season.

Additionally, the tunnel alternatives may involve potential placement of beach-quality sand excavated from tunnel boring activities on beaches and near-shore in the project vicinity. While the Commission generally supports the beneficial reuse of suitable sand through beach placement, a high degree of analysis is needed to understand potential impacts of any proposed sand placement to intertidal and subtidal habitats, including surf grass and grunion spawning sites. Of the tunnel alignment alternatives, the Under Camino Del Mar Alternative appears to pose the most potential for impacts to Los Peñasquitos Lagoon, which is already a critically impaired waterbody. Commission staff encourages SANDAG to consider modifications to this alternative or other measures that would further avoid or minimize impacts to sensitive lagoon resources.

Thank you for your consideration of these comments and we look forward to continued close coordination with SANDAG throughout the environmental review and regulatory process for this important rail realignment project. If you have any questions, please feel free to contact me at Deanna.Christensen@coastal.ca.gov.

Sincerely,
Deanna Christensen
Deanna Christensen
Senior Environmental Scientist
Energy, Ocean Resources and Federal Consistency

Attachments: SD_5_VAR_San Diego (LOSSAN) Rail Realignment (SDLRR) Project Modified NOP 6-30-2025.pdf

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From: Dodson, Kimberly@DOT <kimberly.dodson@dot.ca.gov>
Sent: Monday, June 30, 2025 4:02 PM
To: Tim Pesce <tpe@sandag.org>; State.Clearinghouse@opr.ca.gov <State.Clearinghouse@opr.ca.gov>
Cc: Aston, Shannon@DOT <Shannon.Aston@dot.ca.gov>
Subject: Revised comment letter for LOSSAN Rail Realignment SDLRR NOP SCH#2024060038 from Caltrans District 11

Greetings:

Please see the revised comment letter for the LOSSAN Rail Realignment SDLRR SCH#2024060038 NOP. Please use this comment letter instead of the previous comment letter submitted.

Thank you,

Kimberly D. Dodson, GISP, M. Eng.
(pronouns she/her)
LDR/Regional Planning/Modeling/Travel Forecasting Branch Chief
Caltrans District 11
4050 Taylor St., MS 240
San Diego, CA 92110
Cell: (619) 985-1587

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
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June 30, 2025

11-SD-5, 56, 805
PM VAR
Updated NOP of a Draft EIR for the LOSSAN SDLRR Project
NOP/SCH#2024060038

Mr. Tim Pesce
Senior Planner
SANDAG
1011 Union Street Suite 400
San Diego, CA 92101

Dear Mr. Pesce:

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the LOSSAN SDLRR Project. Caltrans supports this very important project that will provide a reliable fast and frequent service in the Interstate 5 (I-5) Corridor, which is a key priority of the state's rail plan. Adding capacity and developing resilient infrastructure in this segment is an important step in creating a competitive alternative to I-5 and meeting the state's Vehicle Miles Traveled (VMT) goals.

Caltrans looks forward to our continued partnership to provide an efficient and cost effective multimodal, multiagency transportation corridor. If you have any questions or concerns, please contact Shannon Aston, LDR Coordinator, at (619) 992-0628 or by e-mail sent to shannon.aston@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

Attachments: CoDM SDLRR Project NOP Comments_June 2025_FINAL.pdf

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From: Clement Brown <cbrown@delmar.ca.us>
Sent: Wednesday, June 25, 2025 10:10:12 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: SDLRR Project NOP

Please find attached the City of Del Mar's comments on the Updated NOP for the San Diego LOSSAN Rail Realignment Project.

Best regards,
Clem

Clem Brown | Assistant City Manager
City of Del Mar
1050 Camino del Mar
Del Mar, CA 92014
858.375.9524 | cbrown@delmar.ca.us

CITY OF DEL MAR

CITY OF DEL MAR

June 25, 2025

San Diego Association of Governments (SANDAG)
1011 Union Street, Suite 400
San Diego, CA 92101
ATTN: LOSSAN Comments

Re: City of Del Mar Comments on the Updated Notice of Preparation of a Draft Environmental Impact Report for the San Diego LOSSAN Rail Realignment Project

LOSSAN Rail Realignment Project Team,

This letter is respectfully submitted on behalf of the City of Del Mar (City) as approved by the Del Mar City Council on June 16, 2025.

The City has closely monitored the SANDAG LOSSAN Rail Realignment project (Project) since public outreach began in 2020, given its potential to significantly and negatively impact Del Mar's quality of life, environment, public safety, economy, property values, and municipal revenues. City representatives participated in the 2024 Value Analysis (VA) process and have been a driving force in encouraging SANDAG to identify alternative alignments that mitigate potential impacts to the City to the maximum extent practicable. However, the fundamental issue at hand is that SANDAG is not the proper Lead Agency to oversee the preparation of a Draft Environmental Impact Report (DEIR) for the Project under the California Environmental Quality Act (CEQA). For SANDAG to continue in this role will ensure that the DEIR and the entire CEQA process are defective.

By this letter, the City incorporates its prior comments submitted to SANDAG in response to the first Notice of Preparation ("NOP") for the Project. Those comments were approved by the City Council and submitted to SANDAG on July 16, 2024. The City's prior comments focused on the potential impacts from the Project to the City's residents, businesses, and visitors from the Project. Those comments are relevant to the Updated NOP and the concerns raised should be analyzed in the forthcoming DEIR and Environmental Impact Statement (EIS). The City requests that those comments become part of the administrative record in this manner.

The City appreciates the opportunity to submit formally the following comments and concerns regarding the Updated Notice of Preparation (NOP) for the DEIR that was issued by SANDAG on May 16, 2025. The Updated NOP includes revised Project Goals and Objectives, a Project Description and Alternative Alignments to be analyzed in the DEIR; however, **this is the City's Lead Agency role and not SANDAG's**.

The comments below reflect the grave concerns that our community members have expressed in public hearings to the City Council. The Project and its alternatives have the potential to disproportionally and adversely impact our community's quality of life, tourism, local businesses, tax revenue, property values, and significantly impact our unique and sensitive coastal resources. Further, the Project's expansive environmental impacts have potential to forever alter the

community character of our City, its history, and adversely impact our citizens' health, prosperity, and wellbeing. For example, has SANDAG considered the environmental and public safety impacts from train vibrations and the weight of heavy freight trains in a tunnel through the eroding Del Mar hillside? **Given these impacts and SANDAG's lack of approval authority over the Project, the Lead Agency role should be transferred to the City.** The City requests to discuss this transfer with SANDAG staff prior to seeking formal determination of the Lead Agency through the State's process.

I. SANDAG is Not the Proper Lead Agency under CEQA.

SANDAG is the incorrect Lead Agency for the Project, and consequently any further actions to advance the environment review of the LOSSAN project are invalid and prejudicial to CEQA. Under CEQA, SANDAG is the **least favored** Lead Agency because it is a special purpose district, has the least regulatory oversight, assumes no environmental consequences from its limited actions, and is not the first agency to issue land use or development permits. Instead, SANDAG is merely a project manager and banker of Federal funds, should they be granted for the Project, and a contract manager that oversees the consultants processing the environmental documentation and associated engineering studies. Nearly all local municipalities have these abilities.

Conversely, the City, its community members, businesses, and visitors will all be significantly impacted by the Project. Unlike other SANDAG projects, the Realignment Project is almost entirely within the jurisdictional boundaries of the City. Therefore, it is the City that will be most impacted by air toxic emissions, short- and long-term traffic impacts, public access blockages to the coastline, sensitive coastal and wetland resource impacts, as well as vibration impacts to residents and businesses, noise impacts to homes and businesses, among other adverse impacts. In addition, its residents will face significant condemnation proceedings, property devaluation, and loss of marketability of their homes and businesses.

The City will be required to amend its Local Coastal Program (LCP), General (Community) Plan and Zoning Code and Maps, issuance of Coastal Development Permits, Design Review Permits, grading permits, tree removal permits, encroachment permits, grant land leases, and building permits for the Project. SANDAG has none of these regulatory roles.

CEQA defines the criteria for determining what agency should serve as a Lead Agency (14 CCR Sec. 15051). A Lead Agency is different than a Responsible Agency in that it exercises control of the preparation of the Environmental Impact Report (EIR) and related documentation for the project. SANDAG has historically acted in the capacity of Lead Agency for rail and highway projects under the authority granted to them under Senate Bill 1703. (As codified in Cal.Gov. Code 29532.1 and Division 12.7 of the CA Pub. Utilities Code). However, Senate Bill 1703 does not grant SANDAG plenary powers to function as the Lead Agency in all circumstances.

Importantly, as discussed below, Senate Bill 1703 recognizes that SANDAG "shall not have any authority over local land use decisions affecting permitting or zoning of public or private development projects." (CA Gov. Code Sec. 132354.6). In summary, Senate Bill 1703 leaves zoning and other land use controls in the hands of local government. Having the City act as the Lead Agency is a recognition that the City will be disproportionately impacted by the Project, and a further realization that it is the City who is the first called upon to act in approving or denying several significant permits, zoning, and Local Coastal Program approvals.

A. SANDAG Cannot Override Local Land Use Control or Act as the CEQA Lead Agency in all Cases.

The powers granted to SANDAG under SB 1703 include the following:

1. Sue and be sued;
2. To acquire any property by any means, and to hold, manage, occupy, develop, jointly develop, dispose of, convey, or encumber property;
3. To create a leasehold interest in property for the benefit of the consolidated agency;
4. To acquire, by eminent domain, any property necessary to carry out any of its powers or functions;
5. To merge or split parcels, adjust boundary lines, or take similar actions as part of the acquisition of land or as needed to carry out its functions;
6. To construct, acquire, develop, jointly develop, maintain, operate, lease, and dispose of work, property, rights-of-way, and facilities; and
7. To enter into and perform all necessary contracts, and to do any other things to carry out the purposes of this chapter. (CA Gov. Code Sec. 132354).

However, none of the powers listed above state that SANDAG is specifically granted Lead Agency status under CEQA. More importantly, Section 132354.6 states: "*Except as otherwise provided by law, [SANDAG] shall not have any authority over local land use decisions affecting permitting or zoning of public and private development*." (CA Gov. Code Sec. 132354.6). Therefore, the conflicting provisions of SB 1703 and CEQA taken together demonstrate that the City should function as the CEQA Lead Agency. Further, the courts have held that the determination of Lead Agency is a procedural question subject to independent review. (Planning & Conservation League v. Department of Water Resources (2000) 83 Cal.App.4th 892,905-906). Improperly acting as Lead Agency is a failure to proceed in the manner required by law and an abuse of discretion. (PCL v. DWR, supra, 83 Cal.App.4th at 912).

B. Criteria for Identifying the Lead Agency.

CEQA provides the criteria for determining the Lead Agency when there is a dispute between two agencies seeking to function as the Lead Agency. Where two or more public agencies will be involved with a project, the determination of which *agency* will be the Lead Agency shall be governed by the following criteria:

(a) If the project is carried out by a public agency, that agency shall be the Lead Agency even if the project would be located within the jurisdiction of another public agency.

(b) If the project is to be carried out by a nongovernmental person or entity, the Lead Agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.

(1) The Lead Agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose such as an air pollution control district or a district which will provide a public service or public utility to the project.

> (2) Where a city prezones an area, the city will be the appropriate Lead Agency for any subsequent annexation of the area and should prepare the appropriate environmental document at the time of the prezoning. The local agency formation commission shall function as a Responsible Agency.
>
> (c) Where more than one public agency equally meets the criteria in subdivision (b), the agency which will act first on the project in question will normally be the Lead Agency.
>
> (d) Where the provisions of subdivisions (a), (b), and (c) leave two or more public agencies with a substantial claim to be the Lead Agency, the public agencies may by agreement designate an agency as the Lead Agency. An agreement may also provide for cooperative efforts by two or more agencies by contract, joint exercise of powers, or similar devices.

The above provisions must be read with the statutory limitation on SANDAG's powers under 132354.6 noted above, which provides: Except as otherwise provided by law, the consolidated agency shall not have any authority over local land use decisions *affecting permitting or zoning of public or private development projects*.

The City has significant permitting and zoning approval authority over the Project because it will have to amend its LCP, Community Plan, Zoning Code and Map, issue Coastal Development, Design Review, grading, building, encroachment, and tree removal permits, and approve a host of other zoning changes. Hence, The City has compelling arguments for functioning as the Lead Agency or having similar oversight rights of a Lead Agency. The City faces irreparable harm from the alternative alignments as currently proposed for the Project.

C. Request for Formal Lead Agency Consultation.

Based on the foregoing, the City formally requests a consultation with SANDAG's senior management team to resolve any dispute that it may have with the City acting as the Lead Agency for the Project.

II. The Public Works Exception Under the California Coastal Act does not Apply to the Project.

SANDAG may not legitimately assert that the City has lost regulatory control over the Project because of the public works project exception under the California Coastal Act. The public works project is a narrowly applied provision of the California Coastal Act that allows for a public works project to override local LCPs for the greater good of the community.

Relevant section of the Coastal Act:

> *"Any person authorized to undertake a project or proposing an energy facility development may request any local government to amend its certified local coastal program, if the purpose of the proposed amendment is to meet public needs of an area greater than that included within such certified local coastal program that had not been anticipated by the person making the request at the time the local coastal program was before the commission for certification. If, after review, the local government determines that the amendment requested would be in conformity with the policies of this division, it may amend its certified local coastal program as provided in Section 30514.*

> *"If the local government does not amend its local coastal program, such person may file with the commission a request for amendment which shall set forth the reasons why the proposed amendment is necessary and how such amendment is in conformity with the policies of this division. The local government shall be provided an opportunity to set forth the reasons for its action. The commission may, after public hearing, approve and certify the proposed amendment if it finds, after a careful balancing of social, economic, and environmental effects, that to do otherwise would adversely affect the public welfare, that a public need of an area greater than that included within the certified local coastal program would be met, that there is no feasible, less environmentally damaging alternative way to meet such need, and that the proposed amendment is in conformity with the policies of this division." (Calif. Coastal § 30515.)*

In 2014, the California Coastal Commission approved a North Coast Corridor Public Works Plan for SANDAG, and one of its many features included rail upgrades, such as double tracking along the current rail footprint. It did not, however, include the alternative alignments currently proposed for environmental review in the DEIR. Further, SANDAG did not follow the procedures established in Section 30515 of the Coastal Act of first seeking the City's approval of an LCP amendment.

For SANDAG to effectively use the North Coast Corridor Public Works Plan to override the City's LCP, the EIR/EIS would have to be certified and then SANDAG would submit an LCP amendment to the City. Should the City deny the LCP amendment, then SANDAG could appeal the denial to the California Coastal Commission for consideration. SANDAG has not met these regulatory requirements to effectively use the Public Works Plan to override the City's LCP.

In summary, the California Coastal Commission's approval of the 2014 North Coast Corridor Public Works Plan does not override the City's authority under the Coastal Act to issue an LCP amendment for the Project. Notably, the 11-year-old plan does not reflect the alternative alignments currently proposed, and in 2014, SANDAG failed to follow the necessary procedures to *first* submit an LCP amendment to the City prior to submitting the plan to the Coastal Commission for approval. These procedural failures and the fact that the 2014 North Coast Corridor Public Works Plan does not reflect the currently proposed alternative alignments voids the application of that plan to the Project.

III. The Project Objectives Place Rail Operations Above the Protection of Coastal Resources.

The Project's first objective is to improve the reliability of rail service at the expense of the City's businesses, residents, and the natural environment. This is highlighted by the fact that the Project's goal is merely to "minimize negative effects" or "minimize impacts" to coastal resources or homes and businesses. CEQA's role is to reduce significant environmental impacts to below a level of significance. (Public Resources Code Sec. 21081; CEQA Guidelines Sec. 15021). Placing operational efficiency above the protection of the natural environment, as the Project does, is contrary to the principles of CEQA.

IV. The Project Objectives are Unclear and Incomplete.

As noted, the Project's goal and objectives included in the Updated NOP appear to place operational objectives before protecting the Del Mar community. While the objectives state that the Project will minimize impacts on homes, businesses, and to natural resources, it appears that any operational concern can override these impacts and that is not what CEQA requires. It further

appears that the operational objectives could unfairly limit or unduly constrain the proposed alternative alignments making the protection of the Del Mar community a secondary concern rather than a primary concern of SANDAG. In summary, the Updated NOP's goal and objectives predetermine the outcome of the DEIR in favor of operational objectives, and consequently, could forever change the character of our City as well as its economy, public safety, and municipal revenues.

As the City stated in its prior NOP comments, the proposed objectives are not weighted, which allows SANDAG to unilaterally determine which objectives are more important than others. There is no methodology to determine which objective will have more importance when environmental impacts are compared against operational impacts for each of the proposed alternative alignments. In summary, there is no definitive method to determine what alternative alignment will score the highest when analyzed against the proposed project objectives. Moreover, it appears that the operational objectives have precedence over community concerns and would result in the discounting of the environmental impacts of a particular alternative alignment if that alignment meets the operational objectives of SANDAG. As a result, by placing operational objectives above environmental considerations, SANDAG begins the environmental review process by biasing the outcome of the DEIR by placing operational objectives above all other environmental considerations.

Other objectives should be included when evaluating the relative benefits of the Project to its alternatives, such as quantifying the impacts from condemnation, including its costs, the number of properties affected, impacts on residents and businesses, property value impacts, and timing considerations. Also missing in the objectives are the avoidance and/or minimization of negative impacts on air quality and public health and safety. Nowhere in the objectives is public health seriously considered. If an alternative places our residents at risk from toxic air pollution it should be disregarded from the outset.

Determining the relative weight of an objective from the onset of the EIR process is foundational to transparency, and by not providing this decision-making framework before the DEIR is released for public review obscures how the objectives will be valued and leaves these decisions to staff alone.

The objectives should also include the relative impacts to the character of the coastal communities. At present only the City of Del Mar is being asked to bear all the adverse impacts of the Project when compared to other coastal communities. In summary, the objectives fail to take into consideration the impacts on each coastal community or city and the objectives should place the historic and unique character of each impacted coastal community above operational efficiencies.

V. The Project Description and Descriptions of Project Alternatives are Vague and Incomplete.

The City remains concerned with SANDAG's approach of advancing multiple concepts (in this case, four alternative alignments plus the "no build" option) for analysis in the DEIR without a clearly defined "Project Description" and without sufficient detail to understand the precise location of each of the alternatives. The Updated NOP continues to speak in terms of alternatives and fails to identify the actual project. Alternatives, under CEQA, are required to lessen the environmental consequences of the Project. Here, there is no single identified Project, just various alternatives. This basic failure further demonstrates why SANDAG should not be the Lead Agency.

CEQA requires a "proposed project" to be identified along with a "range of reasonable alternatives" to that proposed project. (*Washoe Meadows Community v. Department of Parks & Recreation* (2017) 17 Cal.App.5th 277, 290 ["The presentation of five very different alternative projects in the DEIR without the designation of a stable project was an obstacle to informed public participation"].) The EIR's "bona fide subject" must be "[t]he defined project and not some different project." (*Concerned Citizens of Costa Mesa v. 32nd Dist. Agric. Assn.* (1986) 42 Cal.3d 929, 938.) Further, inadequate or unstable descriptions of the Project may mislead the public and thwart the EIR process. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656.)

Without a clear identification of the proposed project, members of the public cannot comment in any meaningful way on the potential impacts of the project. (*Save Our Capitol! v. Department of General Services* (2023) 87 Cal.App.5th 655, 676.) "A project description that gives conflicting signals to decision makers and the public about the nature of the project is fundamentally inadequate and misleading." (*South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 332.) Here, the public is asked to conjure what a reasonable range of alternatives might be to each of the four proposed alignments, and to numerous options for portal locations. SANDAG staff's recommendations to the Board of Directors identifies alternatives, but not the required proposed "bona fide" project. (CEQA Guidelines Sections 15378 and Section 15126.6).

VI. The Project and Each Alternative Should Be Fully Analyzed.

The alternatives analysis is the "core of the EIR." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal 3d 553, 564.) "One of [an EIR's] major functions . . . is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official." (*Laurel Heights Improvement Ass'n. v. Regents of the University of California* (1988) 47 Cal. 3d 376, 400.) Accordingly, the Project and all alternatives should be reviewed in the DEIR at the same thorough level of analysis. Given the expansive scope and complexity of the Project, each alternative should be evaluated at the same level as the Project Description. Full analysis of each alterative is the only transparent method of insuring that the decision makers understand the full range of impacts of each alternative. The fundamental purpose of CEQA is to ensure informed decision-making. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515.) This includes socioeconomic impacts, condemnation impacts, and resource protection issues, which are required under NEPA.

The Updated NOP includes an alternative alignment proposed by a group of Del Mar residents that has been shared and discussed with SANDAG's senior management. Those residents have worked tirelessly and invested their own resources to develop what is being called the "Northern Yellow Line", which could eliminate and/or mitigate the Project's most significant impacts on the City. This alternative needs to be properly analyzed in the DEIR.

VII. There is no Federal Lead Agency.

SANDAG has yet to name their federal partner, which is critically important. The Project cannot proceed without federal funding and federal authorization. Failure to identify this federal partner will lead to a defective EIR because once an EIS is drafted, it is likely to contradict or add new evidence of impacts that are new or different than what the EIR evaluated. SANDAG, and more properly, the City should not proceed with the CEQA process until such time that a federal Lead Agency and a federal funding commitment has been made. Failure to secure a federal Lead

Agency and associated funding is a prerequisite to proceeding with CEQA otherwise SANDAG is wasting valuable City and public resources. Finally, it appears by federal statute that the Surface Transportation Board may have certain authority over LOSSAN rail expansion projects, yet they and other federal agencies have to date shown no interest in the LOSSAN project. SANDAG is not entitled to shop for a favorable federal Lead Agency. It is instead required to follow the regulations of the agency that has jurisdiction of major federal actions. (49 C.F.R. Part 1105).

Moreover, as a threshold matter, SANDAG should justify to their federal lead agency partners that the Project makes economic sense. The City therefore requests that a cost benefit analysis be included in the DEIR and EIS.

VIII. The Range of Alternatives are Deficient.

The four alternatives do not provide solutions to the unprecedented impacts that the City will be asked to absorb. The City as a Lead Agency would explore solutions that avoid all impacts on the City and more directly connect to the I-5 corridor. Alternatives that transit through the City are not acceptable. Alternatives that result in significant condemnation proceedings are equally not acceptable. Yet, no alternatives were presented that avoid these profound impacts. Below we provide a few summary comments as it relates to each of the four alternatives. However, as noted, SANDAG has again failed to identify a single proposed Project, and to substitute multiple alternatives does not solve the need to define the project.

- San Dieguito Bridge to 1-5 Alignment: This alternative that follows the lagoon along an elevated bridge to a cut and cover tunnel and then transitions to an undergrounding project has significant promise to reduce community impacts to the City. However, the key question left unaddressed is will this alternative be acceptable to the resource agencies given its proximity to protected wetlands? If this alignment intrudes into wetlands, how viable is this alternative? Moreover, the elevated bridge along the lagoon will impact protected public views to the coastline. The route could become more acceptable if it were contained fully in an underground tunnel or if the alignment were directed further away from protected wetlands and the community, as proposed in the “Northern Yellow Line” alternative developed and submitted to SANDAG by a group of Del Mar residents.

- Under Crest Canyon Alignment: This alternative includes a north portal location that would require eminent domain to take private property and result in significant short-term and long-term impacts to residential neighborhoods along Jimmy Durante Boulevard and Jimmy Durante Boulevard itself. This roadway is one of the City’s main arterial roadways and would cause major disruption to the entire City’s roadway system. Further, this alternative continues to require subsurface easements.

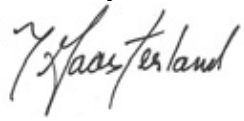
- Under Camino Del Mar Alignment: This alternative includes north and south portal locations in the City that require eminent domain of private property. The portals would emit continuous air pollution and noise venting onto homes and the coast and wetlands. Like the “Under Crest Canyon” alternative, this alignment would result in significant short-term and long-term impacts to Jimmy Durante Boulevard. Again, subsurface easements would also be required.

- Del Mar Bluffs Double Track Reinforced Alignment: This alternative would result in significant and permanent impacts to protected and sensitive coastal resources, and the

removal of permitted private encroachments in North County Transit District (NCTD) right-of-way. Environmental permitting of this alignment would face significant challenges. Again, it is worth noting that this alternative was previously studied and dismissed in 2007 as infeasible for the reasons described above. Finally, this alignment does not meet SANDAG's own operational objective of moving the current rail line off the fragile and environmentally sensitive coastal bluffs. This alignment would only add to ongoing rail delays from future bluff failures. Therefore, this alternative should be removed from consideration. Moreover, on February 27, 2025, the California Coastal Commission took a strong position against this alternative alignment and found it inconsistent with prior Commission actions and SANDAG's own representations. The letter stated: "*If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21, its Sea Level Rise Guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls*." Accordingly, this alternative should not be considered as it is unacceptable to the Commission and the community of Del Mar. Instead, this alternative should be replaced with the "Northern Yellow Line" alignment proposed by Del Mar residents.

We appreciate the opportunity to comment on the Updated NOP for the San Diego LOSSAN Rail Realignment Project and look forward to our discussion concerning the transfer of Lead Agency functions to the City.

Sincerely,



Terry Gaasterland
Mayor

cc: Del Mar City Council
Ashley Jones, Del Mar City Manager
Mario Orso, SANDAG Chief Executive Officer
Maria Rodriguez Molina, SANDAG Director of Mega Projects, Border, and Goods Movement

Attachments: NOP Comment Letter 2025 with Attachment.pdf

From: Amy Williams <awilliams@cosb.org>
Sent: Monday, June 30, 2025 11:56:22 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Alyssa Muto <amuto@cosb.org>; Dan King <DKing@cosb.org>; Joseph Lim <jlim@cosb.org>; Dan Goldberg <dgoldberg@cosb.org>
Subject: NOP Comment Letter

Good afternoon,

Attached please find a letter from the City of Solana Beach.

Thanks,

Amy Williams
Executive Assistant
City Manager's Office
City of Solana Beach
Phone: (858) 720-2431
Fax: (858) 792-6531
www.cityofsolanabeach.org

CITY OF SOLANA BEACH www.cityofsolanabeach.org
635 SOUTH HIGHWAY 101 • SOLANA BEACH, CA 92075 • (858) 720-2400 • Fax (858) 720-2455

June 30, 2025

Mario Orso, Chief Executive Officer
San Diego Association of Governments (SANDAG)
Attn: LOSSAN Comments
1011 Union Street, Suite 400
San Diego, CA 92101
E-mail: LOSSANcomments@sandag.org

RE: City of Solana Beach Comments Regarding San Diego LOSSAN Railroad Project Revised CEQA Notice of Preparation (May 2025)

Dear Mr. Orso:

The City of Solana Beach (City) appreciates the opportunity to comment on the San Diego Association of Government's (SANDAG) Revised Notice of Preparation of Draft Environmental Impact Report (2025 NOP) per the California Environmental Quality Act (CEQA) for the San Diego LOSSAN Railroad Project (Project). The Project proposes to realign the existing rail line between Sorrento Valley and Solana Beach away from the eroding bluffs adjacent to the Pacific Ocean near the City of Del Mar.

The City commends SANDAG's reassessment and revision of the NOP from the prior NOP released in June 2024 (2024 NOP). The 2025 NOP is a significant improvement over the 2024 NOP: the 2025 NOP provides far more certainty about the scope of the Project compared to the 2024 NOP, clarifies the Project objectives, and incorporates critical technical and stakeholder feedback. These revisions will ensure that the Project achieves its objectives while preserving the environment, safeguarding local quality of life, avoiding disruption to business and economic engines, and protecting private property.

The City has various recommendations for the environmental analysis to be performed for the Project that are described in this letter. However, the City's specific comments regarding the 2025 NOP are focused on three main issues: (1) concurrence for SANDAG as the appropriate lead agency for this Project under CEQA; (2) possible refinements to the San Dieguito Bridge-to-I-5 Alignment (Yellow Line); and (3) prioritizing rail service enhancement and reliability in the Project.

I. BACKGROUND

SANDAG released the 2025 NOP on May 16, 2025, following requests for revisions and additional stakeholder input in response to the 2024 NOP. The 2025 NOP identifies the "Project" as the "San Diego-Los Angeles-San Luis Obispo (LOSSAN) Rail Realignment Project." Like the 2024 NOP, the 2025 NOP explains that segments of the LOSSAN rail corridor within the San

Diego area have experienced bluff collapses and erosion resulting in closures, speed reductions, and repeated bluff stabilization projects. The California Coastal Commission is requiring SANDAG to evaluate realignment of the segment of the LOSSAN corridor away from its current location on the eroding bluffs. The 2025 NOP defines the Project's "study area" as follows: "The Project is located within portions of the cities of Del Mar and San Diego…. The Project study area begins at the future Special Events Platform that will be constructed as part of the San Dieguito Double Track Project in the north and ends at the Sorrento Valley Station in the south. The study area is generally bounded to the west by the Pacific Ocean and to the east by I-5."

The Project goals and objectives were discussed as part of the SANDAG's Values Analysis process and in renewed consultation with technical and representative stakeholders following release of the 2024 NOP. The 2025 NOP includes the updated one (1) project goal and six (6) project objectives for the Project:

Project Goal: To maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN rail corridor.

Project Objectives:

1. Improve rail service reliability by minimizing risks from climate change, including consideration of sea level rise, flooding, and the stability of the coastal bluffs.

2. Maintain passenger rail service to Solana Beach and Sorrento Valley and accommodate direct rail access to the 22nd District Agricultural Association (Del Mar Fairgrounds) while minimizing disruptions to passenger and freight service during construction.

3. Minimize impacts to existing homes, businesses, tourism, and major economic generators, including the Del Mar Fairgrounds, and transportation facilities during and after construction.

4. Avoid and/or minimize negative effects, and where possible enhance biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places.

5. Help meet the goals of the 2021 Regional Plan and the 2024 California State Rail Plan by increasing passenger and freight train capacity, further reducing travel times, improving reliability, and considering existing and planned investments.

6. Improve coastal access and safety by eliminating at grade railroad crossings and minimizing points of interaction between rail and all other modes of transportation.

7. Demonstrate good public stewardship by delivering the project in a timely way that considers prior and ongoing investments, construction, right-of-way, operations, and maintenance costs.

The 2025 NOP identifies four (4) alternative routes for realignment and a No Project Alternative. The four alignments are the results of more intensive technical evaluation and more significant stakeholder consultation than was conducted for the alignments presented in the 2024 NOP. The City commends SANDAG for reconsidering the 2024 NOP alignments and producing the 2025 NOP in response to important data and feedback.

A. San Dieguito Bridge to I-5 Alignment: "Yellow Line"

The Yellow Line would run from either the south side of the San Dieguito Double-Track Project bridge or the future Special Events Platform at the north end of this proposed alignment, and continues south and east over Jimmy Durante Boulevard and Racetrack View Drive, then into a tunnel that generally follows the I-5 freeway before terminating at the knoll near Carmel Valley Road (Knoll).

Per SANDAG's May 2025 San Diego LOSSAN Rail Realignment Project Post Value Analysis Study Assessment (2025 Assessment), the purpose of the Yellow Line "is to locate the bored tunnel alignment underneath I-5 while minimizing private subsurface easements and effects to the City of Del Mar, the Del Mar Fairgrounds, and the future San Dieguito Bridge to the extent practicable." The 2025 Assessment explained that some stakeholders advocated for a more northerly variation of the Yellow Line—**the City requests that more details about this more northerly variation – including design speed; whether it is below-, at-, or above-grade; and functionality for all users of the rail corridor – be disclosed to the public**, as discussed below.

SANDAG estimates the Yellow Line will cost from **$3.8 billion to $5.1 billion**.

B. Under Crest Canyon (Jimmy Durante to I-5 Knoll): "Blue Line"

The Blue Line would run south of the future San Dieguito Double Track Project bridge and enter a new tunnel portal under Jimmy Durante Boulevard, then continue south, following under Crest Canyon, and exit at the Knoll near I-5.

The 2025 Assessment explained that the purpose of the Blue Line is to develop an alignment that would support 110-mph speeds within a bored tunnel, which would result in fewer subsurface easements needed from private properties compared to a 90-mph alignment.

SANDAG estimates the Blue Line will cost from **$3.7 billion to $5.0 billion**.

C. Under Camino Del Mar (Jimmy Durante to Torrey Pines Rd.): "Purple Line"

The Purple Line would run south of the future San Dieguito Double Track Project bridge and enter a new portal under Jimmy Durante Boulevard, then continue south under Camino Del Mar, and exit at the Torrey Pines Road West on a bridge over the Los Peñasquitos Lagoon. The existing berm in the Lagoon would be raised and widened to address flooding and sea level rise.

The 2025 Assessment explained that the purpose of the Purple Line is to develop an alignment that minimizes subsurface easements needed from private properties by locating the tunnel directly under Camino Del Mar and using a design speed of 90 mph within the tunnel.

SANDAG estimates the Purple Line will cost from **$3.3 billion to $4.4 billion**.

D. Non-Tunnel Alternative Alignment (Del Mar Bluffs): Green Line

The Green Line is intended to reinforce the existing rail line on Del Mar Bluffs. The Green Line would begin south of the Camino Del Mar roadway bridge and continue south along the existing alignment and under Coast Boulevard. The line would then continue south on the existing tracks with grading and drainage improvements and retaining walls along the eastern side, and slope stabilization and sea walls on the western side. The Green Line would continue south over the Torrey Pines Overhead Bridge, and then over a raised and widened berm over the Los Peñasquitos Lagoon before transitioning back to the existing alignment.

The 2025 Assessment explained that the purpose of the Green Line was to develop a proposal that would maintain the location of the existing rail line and also reinforce the line. The Green Line also adds a second track east of the existing tracks and includes a grade separation to address the at-grade crossing at Coast Boulevard. Neither the 2025 NOP nor the 2025 Assessment appear to disclose the anticipated design speeds for the Green Line—**the City requests that anticipated design speeds for the Green Line be provided.**

SANDAG estimates the Green Line will cost from **$1.9 billion to $2.5 billion**.

E. No Project Alternative

The 2025 NOP also includes a "No Project Alternative." The No Project Alternative "would consist of the continuation of an existing *single-track alignment* along the bluffs that would require the continuation of major stabilization efforts to protect the tracks." The 2025 Assessment similarly explains that the No Project Alternative "would include the continuation of major stabilization efforts that would be required to protect the existing *single-track alignment*," and that "ongoing efforts to maintain *single-track operations* could include installation and maintenance of new and/or expanded retaining walls, drainage improvements, erosion control measures, and/or sea walls."

These descriptions indicate that the No Project Alternative would maintain the existing *single-track* alignment, rather than involve a new double-track. **Please confirm that the No Project Alternative retains the existing single-track alignment, with continued stabilization improvements, and does not include construction of a double-track alignment.**

The City also recommends that when SANDAG evaluates the No Project Alternative, it include an analysis of mitigation measures to address the at-grade crossing at Ocean Boulevard, as well as of future bluff stabilization measures that can minimize the impacts of coastal erosion on the rail infrastructure and private property immediately to the east. It is recommended that SANDAG consider beach nourishment efforts and other resiliency measures as potential mitigation for these on-going maintenance activities.

II. DISCUSSION

The 2025 NOP is a significant improvement over the 2024 NOP. The 2025 NOP provides more certainty about the Project and incorporates critical stakeholder feedback. The City's specific comments regarding the 2025 NOP are focused on three main issues: (1) concurrence for SANDAG as the appropriate lead agency for this Project; (2) possible refinements to the San Dieguito Bridge-to-I-5 Alignment (Yellow Line); and (3) prioritizing rail service enhancement as

an outcome for the Project. The City's more general recommendations for the environmental analysis to be performed for the Project are also discussed in this letter.

Please note that the City may be a Responsible Agency under CEQA and may be required to issue permits for access, encroachments, hauling, and other traffic-control measures within City rights-of-way for temporary and permanent improvements related to the Project.

A. Specific Comments Regarding the 2025 NOP

1. SANDAG is the Appropriate Lead Agency for the Project

Under CEQA, the lead agency on a proposed project is the agency that has "principal responsibility for carrying out or approving" the project and that is responsible for preparing the CEQA documentation and environmental review for the project. (Pub. Resources Code, § 21067; CEQA Guidelines, § 15050.) This is true even if the project will be located in another agency's jurisdiction. (CEQA Guidelines, § 15051(a).) When multiple agencies are involved, the agency "that shoulders *primary responsibility* for creating and implementing a project is the lead agency, even though other public agencies have a role in approving or realizing it." (*Plan. & Conservation League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 239 [emphasis added].)

Conversely, agencies with only tangential roles in approving or implementing a project are not lead agencies. (*Plan. and Conservation League v. Dept. of Water Res.* (2000) 83 Cal.App.4th 892, 904–905.) Rather, these agencies are likely "responsible agencies," which are agencies with limited discretionary authority over a project. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) Responsible agencies must rely on the CEQA analyses prepared by the lead agency, and do not prepare separate analyses. (CEQA Guidelines, § 15096(a); *Bakman v. Dept. of Transp.* (1979) 99 Cal.App.3d 665, 679.) As such, the responsible agency must consider only those impacts within its jurisdiction. (Pub. Resources Code, §§ 21001.1, subd. (d); 21153, subd. (c); CEQA Guidelines, § 15096(d), (g).) In rare cases where more than one agency has a "substantial claim" to act as lead agency, a lead agency may be designated by agreement, or by the State Office of Planning and Research. (Pub. Resources Code, § 21165; CEQA Guidelines, §§ 15051(d), 15053.) However, such agreements cannot be used to designate a lead agency that does not qualify as such under the CEQA statutes and Guidelines. (*Plan. and Conservation League*, *supra*, 83 Cal.App.4th at p. 906.)

For the LOSSAN Project, SANDAG is the appropriate lead agency under CEQA, and there are no other agencies with substantial claims to act as lead agency based on the above regulatory framework or case law. As the 2025 NOP explains, the San Diego Regional Transportation Consolidation Act of 2002 designated SANDAG as the transportation planning agency for San Diego County and assigned SANDAG the responsibility for "planning, funding allocation, project development, and construction in the San Diego region for all transit projects, including heavy rail."[1] Further, SANDAG is the agency designated by federal and state law as San Diego County's Metropolitan Planning Organization, tasked with developing the region's Regional Transportation

[1] See Senate Bill No. 1703 (Peace, 2002), <https://www.sandag.org/-/media/SANDAG/Documents/PDF/footer/legal/senate-bill-no-1703.pdf>.

Plan and Sustainable Communities Strategy, which govern long-term regional transportation and transit projects.[2]

SANDAG's role as the region's legally designated transit planning agency under state and federal law makes it the appropriate lead agency for the LOSSAN Project; there is no other comparable agency. The Project may impact land—both temporarily (construction) and permanently (operation)—within several local cities, the North County Transit District, the California 22nd District Agricultural Association, Caltrans, and numerous other stakeholders such as special utility districts and organizations associated with the lagoons and tributaries. SANDAG is the only regional agency that can plausibly represent all these stakeholders and their interests. Moreover, because the Project is indisputably a transit project, it is precisely within SANDAG's jurisdiction as required by the 2022 San Diego Regional Transportation Consolidation Act.

No doubt multiple agencies will qualify to serve as responsible agencies for the Project, including affected cities that must issue building, encroachment, and other permits to the Project; regulatory agencies with authority over the air, water, soil, and other natural resources that will be affected by the Project; and transportation agencies such as North County Transit District, Caltrans and the U.S. Federal Railroad Administration, who need to review and approve the Project's impacts to the Interstate 5 freeway and to domestic freight lines. However, each of these agencies' discretionary authority over the Project is limited in scope and jurisdiction, and none qualify as lead agency for the Project. For all these reasons, SANDAG is the only logical lead agency for the Project.

2. Yellow Line Refinements: Locations and Design Speeds

The 2025 Assessment disclosed that some stakeholders have proposed alternative northerly variations of the Yellow Line. However, there is no further discussion or analysis of these alternative variations in the 2025 NOP. The City recommends that (1) such variations be timely disclosed and analyzed; (2) any changes proposed on 22nd Agricultural District land be closely coordinated to minimize impacts to usable area, parking, and circulation, and (3) that any changes to the Yellow Line's alignment not result in operational design speeds that are lower than existing speeds and that (4) environmental impacts to the lagoon (e.g., functionality, ecosystem, animal species, etc.)and homes are minimized.

3. SANDAG Should Prioritize Rail Service Efficiency and Reliability

The City recommends that SANDAG prioritize regional rail transit operational efficiency and reliability as an outcome of the Project regardless of which alignment is ultimately selected.

The Project's goal is to "maintain and *enhance* passenger and freight service" on this segment of the LOSSAN corridor, and so SANDAG should focus on producing a Project that maintains and enhances existing stations, stimulates tourism and economic growth, and provides viable and dependable options for commuters wishing to avoid automobile travel. While increased speeds are desirable, a Project that improves rail service while enhancing local quality of life and promoting prosperity is far preferable to a faster rail service that undermines those goals. A Project that dilapidates local stations or engages in disruptive operations would

[2] See SANDAG, Bylaws and Policies (2025), <https://www.sandag.org/mandates>.

not achieve the goal of enhancing passenger and freight service. We encourage SANDAG to prioritize this perspective for any alignment it ultimately selects for the Project.

B. General Recommendations for Analysis by Issue Area

The City recommends that SANDAG evaluate the Project using the factors provided for each environmental issue area identified by CEQA Guidelines Appendix G. The City focuses here only on some issue areas, and incorporates as applicable the general comments provided regarding all the Appendix G issue areas in its prior comment letter for the 2024 NOP (See Attachment A). The comments provided in this letter are based on the rail line alignments provided in the 2025 NOP; if significant changes or mitigation measures alter these alignments, the City shall be afforded an opportunity to submit revised or supplemental comments to address the scope and analysis of potential impacts that could affect City residents and businesses.

1. Air Quality

The City strongly recommends that SANDAG prepare Health Risk Assessments (HRAs) for a variety of scenarios or a master HRA for alignments that would alter existing operations. The potential air quality impacts of the Project could be significant under any new alignment, and HRAs of the Project's air quality impacts to new populations or generation of increased emissions not presently existing are essential to guide decision-makers in selecting the alternative that is least harmful to the public.

2. Greenhouse Gas Emissions

The City recommends that greenhouse gas (GHG) emissions be evaluated in a manner that demonstrates how operational factors such as alignment length, depth, and design speed affect GHG emissions. Similarly, SANDAG should examine how construction of each of the alignments affects GHG emissions.

3. Hazards and Hazardous Materials

The Project is intended to realign the railway lines away from collapsing bluffs for both passenger rail services and also for freight services, including potentially hazardous freight materials. Freight lines traveling along these corridors already transport gasoline, fertilizers, cement, lumber, automobiles, and other materials that could present hazards. Analysis of the risks associated with transportation of these materials through the various new alignments should be conducted.

4. Hydrology and Water Quality

The Yellow Line, the Purple Line, the Blue Line, and the Green Line all entail constructing structures over or adjacent to lagoons. We recommend that SANDAG conduct evaluations of the water quality and hydrology impacts of structures both over and adjacent to lagoons, and the analysis should include evaluation of both construction and operational impacts, as well as impacts to water quality in the event of spills or other accidents.

III. CONCLUSION

The City reiterates our appreciation for the additional engagement, technical evaluation, and coordinated work on refinements in the 2025 NOP. The 2025 NOP provides far more certainty about the scope of the Project and incorporates critical feedback obtained from the cities and agencies who participated throughout the Values Analysis process. Advancing these alignments will ensure that the Project objectives can be achieved while minimizing impacts to homes, existing infrastructure, and the environment. We look forward to working with SANDAG further on this Project.

Sincerely,

Alyssa Muto
City Manager

Attachment A: City of Solana Beach Letter of Comment on the NOP (2024)

CITY OF SOLANA BEACH www.cityofsolanabeach.org
635 SOUTH HIGHWAY 101 • SOLANA BEACH, CA 92075 • (858) 720-2400 • Fax (858) 720-2455

July 18, 2024

San Diego Association of Governments (SANDAG)
Attn: Tim Pesce
401 B Street, Suite 800
San Diego, CA 92101
E-mail: LOSSANcorridor@sandag.org

RE: City of Solana Beach Comments Regarding San Diego LOSSAN Railroad Project CEQA Notice of Preparation

Dear Mr. Pesce:

The City of Solana Beach (City) appreciates the opportunity to comment on the San Diego Association of Government's (SANDAG) Notice of Preparation of Draft Environmental Impact Report (NOP) per the California Environmental Quality Act (CEQA) for the San Diego LOSSAN Railroad Project (Project). The Project proposes to realign the existing railroad line between Sorrento Valley and Solana Beach away from the eroding bluffs adjacent to the Pacific Ocean near Del Mar.

While the City is providing significant comments in response to the NOP, many of our comments are specifically concerning the scope of the project, the project objectives, issue areas to be analyzed, and/or the alternatives, due to the incomplete and confusing NOP issued for this project. Specifically, the Project as defined in the NOP lacks an accurate, stable, and finite project description, describing instead three distinct separate project alternatives without identification of a preferred option. Additionally, the *Project* has been both presented as "moving the rail off of the coastal bluffs of Del Mar" and "linking the Sorrento Valley station to the Solana Beach station". These are more appropriately objectives for the Project under CEQA and not a Project Description that would include all components of the project, location or footprint of disturbance, and project features that should be described and incorporated into the Project *prior* to the analysis conducted under CEQA. Moreover, not all the alternatives are reasonable or feasible, and at least one alternative–Alternative A–does not meet the most basic objectives of the project, nor does it reduce any environmental impacts compared to those likely to occur as a result of Alternatives B or C.

The City of Solana Beach urges SANDAG to remove Alternative A. We reiterate our offer and our commitment to explore more environmentally, socially, and economically viable alternatives for the rail realignment project. Alignment A is the most environmentally harmful alternative; could cause disastrous impacts to the Del Mar Fairgrounds and recreational and open space lands; costs double the amount of other alignments; and threatens both existing multi-family residential units in Solana Beach, as well as affordable homes under proposal by Del Mar on the Fairgrounds property. As part of this letter, the City provides details and

discussion on this issue and other substantive and procedural concerns based on the limited information contained within the NOP. The City also provides comments and scoping recommendations for further analysis by issue area, to add needed details to SANDAG's technical analyses so the public can be provided with a better understanding of the Project, the range of alternatives, and any potential impacts.

I. BACKGROUND

SANDAG released the NOP on June 4, 2024. The NOP identifies the "Project" as the "San Diego-Los Angeles-San Luis Obispo (LOSSAN) Rail Realignment Project." The NOP explains that segments of the LOSSAN rail corridor within the San Diego area have experienced bluff collapses and erosion resulting in closures, speed reductions, and repeated bluff stabilization projects. Per the NOP, the California Coastal Commission is requiring SANDAG to evaluate realignment of the segment of the LOSSAN corridor between Sorrento Valley and Solana Beach (the project "study area") away from its current location on the eroding bluffs. A Project Description needs to be more clearly identified beyond its objectives. An appropriate project description must include all aspects of the Project including, but not limited to, the plans to remove the existing rail on the bluff, reuse of the current rail alignment, and details of the cut and cover design.

SANDAG's NOP identified six project objectives for the Project:

1. Improve rail service reliability by relocating the existing railroad tracks away from the eroding coastal bluffs in Del Mar;

2. Maintain passenger rail service to the existing train stations serving Solana Beach and Sorrento Valley and accommodate direct rail access to the 22nd District Agricultural Association (Del Mar Fairgrounds);

3. Minimize impacts in the surrounding communities during and after construction;

4. Avoid and/or minimize impacts on biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places;

5. Help meet the goals of the 2021 Regional Plan and the 2018 California State Rail Plan by increasing passenger and freight train capacity, further reducing travel times, improving reliability, and accommodating additional rail service; and

6. Improve coastal access and safety by eliminating at-grade railroad crossings and minimizing other pedestrian-rail points of interaction.

The NOP identifies three alternative routes for realignment away from the bluffs. These three alternatives were distilled from over 50 alternatives proposed by SANDAG and certain stakeholders. Alternative A is the longest, most expensive, and most complex to construct. It envisions boring a tunnel starting at a knoll at Interstate 5 in a location between Carmel Mountain Road and Carmel Valley Road (Knoll), running parallel to and below Interstate 5, turning northwest to run underneath the San Dieguito Lagoon and the Del Mar Fairgrounds

(Fairgrounds), to finally emerge from a cut-and-cover tunnel beneath Solana Beach's central business district. Alternative A will result in slower rail operating speeds than current conditions. This alignment will result in temporary and permanent impacts to the Solana Beach Coastal Rail Trail, Solana Beach, Stevens Creek, the Fairgrounds, and the San Dieguito Lagoon as well as to residences and business along Cedros Avenue and Via de la Valle. Alternative A will generate almost 547,000 one-way construction truck trips—over one million round-trip truck trips. SANDAG estimates that Alternative A will cost $4.14 billion for engineering and construction costs alone. The agency calculates that Alternative A meets only four of the six objectives identified for the realignment Project. Specifically, Alternative A fails to meet two Project objectives because it would not minimize impacts to surrounding communities, nor would it preserve biological, cultural, or recreational resources of significance.

Alternative B would construct a tunnel starting at the Knoll that would run through the Del Mar Bluff and emerge near the intersection of Camino del Mar and Jimmy Durante Boulevard. This alternative is well within the middle range of length of all alternatives considered by SANDAG and is almost 8,000 feet shorter than Alternative A. Alternative B maintains current rail operating speeds and results in the fewest impacts to transportation infrastructure of all alignments considered. Alternative B results in the least impact to sensitive resources and to public lands of the three alternatives in the NOP. At an estimated cost of $2.28 billion, Alternative B was well within the median range of costs of all alternatives considered by SANDAG, and is approximately 55 percent of the cost of Alternative A. Unlike Alternative A, SANDAG calculates that Alternative B meets all six of the Project's objectives.

Alternative C is the shortest of the three alternatives in the NOP. This alignment would traverse northwest across the Los Peñasquitos Lagoon, to a portal near Torrey Pines Road, and then descend into a subterranean tunnel running roughly parallel to Camino del Mar before emerging near the intersection of Camino del Mar and Jimmy Durante Boulevard. Alternative C meets current rail operating speeds and requires constructing a railway bridge over Los Peñasquitos Lagoon. Alternative C is the cheapest of three alternatives presented in the NOP at an estimated cost of $1.85 billion. It would be approximately 45 percent of the costs of Alternative A and comparable to the median-range costs of Alternative B. Unlike Alternative A, SANDAG calculates that Alternative C meets all six of the Project's objectives.

II. DISCUSSION

The City's recommendations for SANDAG to improve the NOP and CEQA process overall for this Project are provided below, according to each issue area identified by SANDAG, and in the "checklist" provided in CEQA Guidelines Appendix G. The City has significant concerns both about the substance of the NOP and about the public engagement process used by SANDAG to develop and unveil the alternatives presented in the NOP. We describe these concerns in more detail below. Additionally, depending on the "Project Description," the City may be a Responsible Agency under CEQA and would be required to issue permits for access, encroachments, hauling, and other traffic-control measures related to project improvements within City rights-of-way for temporary and permanent improvements associated with the Project.

A. Recommendations for Analysis by Issue Area

The City requests that SANDAG evaluate alternatives to the Project using the recommendations provided for each environmental factor identified by CEQA Guidelines Appendix G below:

1. Aesthetics

The City has protected views, including designated public scenic viewsheds and regulatory protection of private views. SANDAG should conduct a detailed analysis of both public designated scenic viewsheds and also consider the regulatory requirements for private views protected under the City of Solana Beach Municipal Code.

2. Agriculture and Forestry Resources

SANDAG explains that it did not consider the Agricultural and Forestry Resources factor because it did not identify any such resources in the Project area, presumably for all three alternatives. The City recommends that SANDAG consult with the State of California's 22nd Agricultural District (potentially a Responsible Agency for this Project) to confirm that no agricultural or forestry resources are located within the San Dieguito Lagoon and Fairgrounds areas.

3. Air Quality

The City strongly recommends that SANDAG prepare Health Risk Assessments for a variety of scenarios or a master Health Risk Assessment for each of the three alternatives. The potential air quality impacts of the Project are significant and substantial, and could persist for years while the Project is constructed and operating. Thorough, reliable, and comprehensive health risk assessments of the Project's air quality impacts are essential to guide decision-makers in selecting the alternative that is least harmful to the public.

First, health risk assessments must be performed for the various tunnels contemplated by the three alternatives. The tunnels will trap concentrated diesel exhaust and other emissions from freight and other trains that will eventually vent out of portals into surrounding areas. This concern is particularly acute under Alternative A, which would construct the longest tunnel of all the alternatives (approximately 20,000 feet of bored tunnel and 6,500 feet of cut-and-cover tunnel, totaling about 26,500 feet—approximately five miles—of covered tunnel). The portals at both ends of this tunnel, particularly the north end, which vents in the City's residential and business areas, will therefore be venting almost five miles' worth of train emissions. Additionally, emissions will concentrate in the underground special events platform beneath the Fairgrounds and the San Dieguito Lagoon under Alternative A. These emissions would need to be vented out, possibly through shafts or fan systems, to the surface near the Fairgrounds and the San Dieguito Lagoon. It is vital that the emissions from the five-mile tunnel envisioned by Alternative A, and the emissions from the tunnels envisioned under Alternatives B and C, be analyzed, quantified, modeled, and thoroughly understood by performing a health risk assessment before any alternatives are adopted.

Second, health risk assessments must be made of the construction truck trip air quality impacts that will be caused by each of the alternatives. The NOP calculates that Alternative A

will generate 547,200 *one-way* truck trips for disposal of construction materials, equating to almost 1.1 million round-trip truck trips. The truck trips under Alternative A are more than double the truck trips under Alternative B, and more than *four times* the amount of truck trips under Alternative C. Moreover, these figures only account for truck trips associated with disposal of construction materials for the bored tunnels, cut-and-cover tunnels, and U-structures; they do not account for truck trips associated with roadway construction, bridge construction, emissions from construction equipment, or automobile trips associated with construction workers and other Project personnel. It is essential that a health risk assessment be conducted to examine all vehicle and equipment emissions associated with each alternative; describe how neighboring communities would be impacted; and compare the impacts across the alternatives.

Finally, health risk assessments should examine both construction-related air quality impacts as well as operational air quality impacts. Construction of any of the alternatives is anticipated to take seven-to-ten years, or longer, and operational impacts, such as emissions concentrated in tunnels, will persist indefinitely. It is vital that health risk assessments educate the public and decision-makers about the shorter-term and long-term air quality impacts of the alternatives. Furthermore, this analysis should take into account the cumulative condition of the double-tracking construction, bridge replacement, and construction of the seasonal platform, as well as other nearby construction and/or infrastructure projects that would expose specific populations of people to toxic air emissions over an extended period of time.

4. Biological Resources

The various alternatives to the Project envision varying and distinct impacts to sensitive and other biological resources. The lack of this information in the NOP has caused confusion and misinformation to spread rampantly. It is vital that SANDAG analyze the following issues so that decision-makers and the public have a full and accurate understanding of the potential impacts to biological resources posed by the Project alternatives:

(a) Over-the-Lagoon or Under-the-Lagoon?

Neither SANDAG's screening reports nor the NOP discuss the relative merits or impacts associated with constructing bridge structures over lagoons as compared to constructing tunnels under lagoons. At one public meeting, SANDAG noted that potential benefits of bridge structures included provision of shady areas and that they do not impede water flow. There was little information or understanding expressed regarding the relative benefits of a tunnel beneath a lagoon by comparison. Would either project require temporary damming or diversion structures? Does either alternative enhance wildlife habitat? What are each option's temporary and permanent impacts on water quality? Thorough understanding of these issues is required.

(b) Nature and Number of Sensitive Resources Impacted

SANDAG needs to provide a more thorough comparison of how many sensitive biological resources will be affected by the various Project alternatives. For example, Alternative A would affect not only San Dieguito Lagoon, but would also impact Stevens Creek and require temporary damming and diversion of the San Dieguito River. Alternative C would require construction of a bridge structure over Los Peñasquitos Lagoon, although, as discussed above, there may be benefits to bridge structures. By contrast, Alternative B seems to have fewer

impacts to sensitive or other biological resources. Better understanding of the nature and number of sensitive biological resources impacted by the Project alternatives is needed.

(c) Mitigation and Restoration Plans

The NOP does not discuss what mitigation or restoration measures, if any, SANDAG has planned for repurposing and restoring the Del Mar sea bluffs once the rail tracks have been removed. Similarly, there is scant information about what kind of mitigation is envisioned for either Los Peñasquitos Lagoon or San Dieguito Lagoon if rail tracks are removed from these resources, nor is there any discussion of the approximately six-acre park that is rumored to be constructed above the northern cut-and-cover section of Alternative A in Solana Beach. SANDAG needs to provide better identification and descriptions of potential mitigation and restoration activities that will be required for each and all alternatives in order that a more complete understanding of, and the potential mitigation and remedies for, each alternative's impacts to biological resources can be developed before a preferred alternative is selected.

5. Cultural Resources

The Fairgrounds is the major cultural resource that could be affected by the Project. It is an historic icon of the San Diego region, and an essential community, financial, recreational, and architectural asset. It is one of the region's prime revenue-generating facilities, producing valuable local jobs, and is a gathering place for tourists and San Diego residents from far and wide. It is critical that a thorough analysis of the Project's impact on the Fairgrounds be performed. Alternative A in particular would pose considerable threats to Fairgrounds property and operations. SANDAG acknowledges that this alignment (which requires digging a tunnel and a new special events platform about 80 feet below the Fairgrounds) will disrupt events and operations at the facility, limit the numbers of people and access points to Fairgrounds events, and require temporary and permanent condemnation of Fairgrounds property. Moreover, construction of Alternative A could take at least a decade; therefore, these impacts will be long-lasting and far-reaching for the communities that depend on the Fairgrounds for revenue, income, employment, and recreation. Thus, these impacts to one of San Diego County's premier cultural resources should be fully evaluated.

6. Energy

The CEQA thresholds refer to the unnecessary use of energy that is wasteful or unnecessary as a result of construction or operation. SANDAG should conduct an analysis of the energy consumption required for construction under each alternative, as well as throughout operation. Additionally, given the cumulative nature of the projects occurring within this corridor, Solana Beach requests that SANDAG include a cumulative analysis of the energy consumption/usage associated not only with the construction of the proposed project under each alternative, but also with any rail improvement projects within the same alignment that are planned, such as the double tracking, bridge replacement, and seasonal platform. This should include the analysis of the energy used and (if later demolished for construction of an alternative under the rail realignment) disclosure of that used energy.

7. Geology and Soils

The Project alternatives would affect various types of geology and soils in ways that need to be better understood, as described below.

(a) Under-the-Lagoon or Over-the-Lagoon?

As discussed above, SANDAG has provided little information or understanding of the relative benefits of a tunnel beneath a lagoon as compared to a bridge over a lagoon. How would either affect geology and soils? Do porous soils beneath lagoons and rivers present stability risks?

(b) Liquefaction and Subsidence Issues

Stakeholders are expressing concern about whether tunneling through sandstone hills is safe, and whether tunneling through these materials could cause liquefaction and subsidence of overlying soils and sand. Concerns are also permeating about whether tunneling through sandstone and other coastal soils creates more vibration issues than tunneling through more solid materials.

8. Greenhouse Gas Emissions

The City has similar concerns regarding greenhouse gas (GHG) emissions as it does for air quality impacts under the various Project alternatives. What GHG emissions are associated with train operations, if any? What GHG emissions are associated with the various tunnel lengths—would longer tunnels generate more GHG emissions? How does construction of the various tunnel lengths affect GHG emissions, and how do the various alignments' construction of tunnels compare in generating GHG emissions?

Similarly, thorough comparisons must be made of the GHG emissions associated with the construction truck trips anticipated under each alternative. Alternative A has more than double the amount of truck trips as Alternative B, or more than four times those of Alternative C—does Alternative A generate exponentially more GHG emissions as a result? Of course, GHG emissions associated with other construction equipment and with passenger vehicles will also need to be considered and compared across the Project alternatives.

Finally, as with air quality impacts, GHG emissions should be quantified and compared across Project alternatives for both construction-related emissions and operational emissions. This should include analysis of the cumulative condition that considers other projects planned to occur between now and the start of the rail realignment project, and the related GHG emissions that would be emitted for construction of multiple projects that may occur within the same rail corridor.

9. Hazards and Hazardous Materials

The Project is intended to realign the railway lines away from collapsing bluffs for both passenger rail services and also for freight services, including potentially hazardous freight materials. Freight lines traveling along these corridors already transport gasoline, fertilizers, cement, lumber, automobiles, and other materials that could present hazards. Analysis of the risks associated with transportation of these materials through the various alignments is

needed. For example, can hazardous materials be contained in a tunnel in the event of a spill or other accident? How are impacts different for a tunnel under a lagoon and public events facility as compared to alignments under roadways or deep within hillsides? What types of cleanup activities would be required in the event of an accident, and what are the comparative potential impacts to sensitive biological resources and community cultural resources under each alternative?

10. Hydrology and Water Quality

Alternatives A and C entail either constructing bridges over lagoons and wetlands, or constructing tunnels beneath lagoons and wetlands. It is critical, as described in the Biological Resources section above, that SANDAG conduct thorough evaluations of the water quality and hydrology impacts of both bridges over lagoons and tunnels beneath lagoons. Analyses should include evaluation of both construction and operational impacts, as well as impacts to water quality in the event of spills or other accidents. Finally, comparison of Alternative A and C's water quality impacts to Alternative B, which seems to have far fewer potential water quality impacts, is essential.

11. Land Use and Planning

Some of the Project alternatives would require abandoning or deconstructing various projects for which funds have already been spent and which are, in some cases, already in operation. Alternative A, for example, would require demolition of both the San Dieguito Bridge and the Fairgrounds special events platform, which have both been funded and construction activities begun or are imminent. It is nonsensical to engage in planning and land use activities that vitiate already-completed or just-completed projects and facilities, and approval of an alignment that deconstructs and abandons these projects would be a significant waste of scarce grant funds and taxpayer resources. SANDAG must provide more information about how the various Project alternatives would nullify already-established plans and currently operating projects, as well as the relative resulting costs to the region and taxpayer resources.

12. Mineral Resources

Sand resources are a finite resource within the San Diego region. SANDAG needs to analyze and plan for the disposal and/or reuse of sand extracted as part of the Project, and the indirect impacts related to the extraction of these resources. Additionally, SANDAG should conduct a thorough analysis of the potential mineral resources that may exist and the loss of availability of these resources as a result of the various project alternatives.

13. Noise

The Project, no matter the alignment or alternative selected, will produce construction and operational noise impacts. SANDAG's task is to select the alternative that is feasible, meets most of the Project objectives, and produces the least amount of noise impacts as possible. Given the potential severity of the potential noise impacts involved, the City recommends that SANDAG conduct noise analyses similar to health risk assessments conducted for air quality impacts, including examination of the impacts of persistent noise on adjacent sensitive receptors and communities. Particular focus should be given to receptors nearby tunnel portal locations and U-structure facilities, where train noise is likely to be most acute. Noise impacts on

these receptors should be compared across all Project alternatives so that the least impactful alternative can be advanced. Additionally, construction noise impacts must be studied, particularly for receptors along roadways affected by construction and in public recreational areas, such as the Los Peñasquitos and San Dieguito Lagoons and at the Fairgrounds.

Finally, a technical comparison must be made of the various impacts produced by noise as compared to the impacts produced solely by ground or other vibrations. The Project alternatives have different impacts, and some alternatives seem likely to produce more noise impacts while others produce more vibration impacts. Measuring and comparing these different kinds of impacts is necessary to evaluate how to minimize the most harm to the most receptors, while meeting most of the Project objectives.

14. Population and Housing

All of the alignments under consideration for the Project involve some degree of housing impacts, whether by eminent domain or otherwise. The sensitivity of this issue requires very careful and thorough analysis of the relative benefits and drawbacks of each alternative.

SANDAG must consider whether the housing impacts affect affordable housing or market-rate housing, and what kind of regional effects will result from the loss of each type of housing. SANDAG should also describe the differences between temporary losses of housing from construction activities versus permanent losses of housing from Project operations, as compared across the Project alternatives. Finally, SANDAG must analyze and clearly differentiate the comparisons between full elimination of housing, versus temporary nuisance impacts, such as noise or vibrations. Clearly, permanently eliminating housing is an order of magnitude more severe than mere disturbance caused by intermittent or distant noises or vibrations.

In sum, SANDAG's analysis of the Project's potential impacts to housing should compare the alternatives using these metrics so that decision-makers and the public can understand the affordable-versus-market rate dynamics in housing impacts, the varying regionwide impacts, and the technical, real-world differences between nuisance impacts caused solely by nuisance conditions compared to the impacts associated with full elimination of housing stock.

15. Public Services

The City of Solana Beach relies on sales tax revenue to fund many of its public services. The Project, particularly Alternative A, would affect many sources of the City's sales tax revenue, such as the Fairgrounds, the recreational areas surrounding the Fairgrounds, and the businesses along Cedros Avenue. Therefore, the public services funded by this sales tax revenue would be directly impacted, negatively affecting existing infrastructure and services.

Furthermore, the 22nd Agricultural District lands comprising the Fairgrounds are public lands and are intended for recreational uses. SANDAG should analyze any potential impacts to not only the availability of public recreational services, but also on public recreational facilities and activities (e.g., direct impacts to the San Diego Fairgrounds) across all the alternatives, as required under CEQA for potential recreation impacts, as discussed below.

16. Recreation

SANDAG describes the benefits of Alternative A as including the fact that it would impact the most amount of public lands of the three alternatives identified in the NOP. It is unclear why this is described as a benefit, unless an unnamed Project objective includes prioritization of private property owners over public resources. Considering use of public lands as a benefit obscures the potential impacts associated with such a decision, particularly for communities that rely on public lands for recreational and health purposes. Alternative A would require extensive impacts to public recreational resources in order to construct and operate the subterranean tunnel beneath the San Dieguito Lagoon and the Fairgrounds. Not only would these impacts persist for seven-to-ten years or more during construction of Alternative A, but Alternative A would require permanent occupation of portions of the Fairgrounds, impact Stevens Creek, and destroy the Solana Beach Coastal Rail Trail. Alternative C would require construction of a bridge structure over Los Peñasquitos Lagoon, although the relative long-term benefits and drawbacks of a bridge need to be studied further. Alternative B seems to pose the least threats to public recreational facilities of all the alternatives.

SANDAG needs to conduct an in-depth evaluation of the relative impacts to public recreational facilities across the various Project alternatives. It is patent that Alternative A is designed to encumber public recreational lands and facilities to the maximum degree, and to avoid private lands at all costs. This alternative is grossly inequitable because it harms lower-income communities and the public at large in order to mollify wealthy landowners. It also upends the entire eminent domain scheme, which operates by compensating private property owners in favor of the public good, not the other way around.

17. Transportation

SANDAG's screening reports and NOP describe some of the transportation impacts of the various alignments considered for Project alternatives. However, as with other areas discussed herein, the analysis of transportation impacts needs further detail and comparison across alternatives.

(a) Roadway Transportation Impacts

The roadway transportation impacts of different iterations of Alternative A were analyzed to varying degrees in both the 2023 and 2024 alignment screening studies. The 2023 report is unclear as to what is being analyzed under the "I-5 Alternative." Figure 3-5 of that report does not depict the I-5 Alternative as extending into Solana Beach, but later descriptions (pp. 65-66) of the alignment explain that it would require reconstruction of the Via de la Valle overpass and deepening the existing trench north into Solana Beach adjacent to South Cedros Avenue. The 2023 report also anticipated that the I-5 Alternative would require destruction of the planned San Dieguito Double Track and Fairgrounds special events platform, and would cause permanent impacts to the Fairgrounds' southern parking lot. As is the case with the alternatives in the NOP, the I-5 Alternative is not clearly described, the precise location of the alignment is vague, and there are inconsistent explanations of the alignment's anticipated impacts.

The 2024 assessment evaluated what would become Alternative A, and anticipated that construction access and maintaining rail services between Solana Beach and Sorrento Valley stations for Alternative A would impact Via de la Valle, Lomas Santa Fe Drive, South Highway

101, and South Cedros Avenue, and that Fairgrounds event access would be affected at Via de la Valle and Jimmy Durante Boulevard. Additionally, in order to maintain rail services during construction of the proposed northerly exit/entry point located, additional temporary tracks need to be constructed within the existing trench between Lomas Santa Fe and Via de la Valle in Solana Beach. Due to limited space, the existing trench would need to be widened well beyond the existing improvements and would require substantial grading activities for several years.

Finally, Alternative A's construction impacts and acquisition of additional temporary staging/construction areas needs to be evaluated and the feasibility should be discussed with the affected agencies, i.e. the cities of Solana Beach and Del Mar. These are significant impacts to vital roadways within the local community, and these impacts should be quantified so that stakeholders can understand the scale, locations, and duration of these impacts, as well as how they compare to roadway impacts caused by Alternatives B and C.

(b) Rail Passenger Service Impacts

SANDAG's varying reports discuss maximum passenger rail speed times during construction and operation of the various Project alternatives, but the information is spread across several different reports and pages, and it is challenging to glean a true comparative understanding of the rail passenger service impacts of each alternative from the presentation of the data. For example, Table 6-6 of the 2024 assessment displays the various "restrictive speeds during construction" for both passenger and freight rail service, and section 6.2.2.5 discusses the "design speeds" of the various alternatives, but there is no simple comparative table or analysis otherwise that displays the differences between Alternatives A, B, and C for construction speed restrictions, maximum operating speeds, and time saved from current speeds. Given that one of the primary Project objectives is to improve passenger rail speed and reliability, it is confounding that a simple comparative analysis of how each alternative meets these basic criteria is absent from the reports and the NOP. We strongly recommend that SANDAG revise the NOP to include this comparative analysis.

18. Tribal Cultural Resources

The proposed Project has the potential to damage or destroy unknown subsurface archaeological or tribal cultural resources which could result in a substantial adverse change in the significance of a unique archaeological resource, and the relative impacts of each alternative on tribal cultural resources must be fully analyzed and compared.

19. Utilities and Service Systems

The 2024 assessment, at Table 6-5, provides a basic comparison of the various alignments' impacts to public utilities. Alternative C, represented by Alignment 3, appears to have the fewest utility impacts of the three alternatives in the NOP. However, Alternatives A and B both would cause impacts to a City of San Diego 54-inch trunk sewer and a 36-inch water main that would necessitate "extensive coordination" with the City. Notably, alternatives excluded from the NOP, such as Alignments 1, 7, 9, and 11 had equal or fewer utility conflicts than Alternatives A and B, and although the 2024 assessment discusses various utility conflicts in some detail, there is no clear explanation why Alternatives A and B were selected instead of other alignments that had fewer or no utility conflicts. The City recommends that SANDAG

provide more detailed discussion of its rationale for selecting Alternatives A and B instead of alignments with fewer utility conflicts.

SANDAG should further identify any other facilities including sewer and water lines, pump stations, roadways, or other public facilities that may need to be replaced as part of this project. Moreover, an analysis of indirect impacts of the project on water quality, roadway emissions, and other negative environmental impacts on City infrastructure should be considered as part of the analysis of project alternatives. Of note, Table 6-5 fails to include utilities located within/attached and/or between the Via de la Valle and Lomas Santa Fe bridges. Water, sewer, storm drain and recycled water utilities exist that serve properties in both Del Mar and Solana Beach that would likely be affected by Alternative A, but there is no discussion of these potential impacts in the NOP.

20. Wildfires

SANDAG should consider how emergency response will be conducted during construction and operation of the Project should a wildland fire ignite or incident on I-5 occur that shuts down freeway access in both north and south directions. Limited access to the region during construction and operation of the Project would impact not only traffic circulation, but also evacuation sites, as the Fairgrounds is presently designated as a wildfire evacuation location for the region.

21. Mandatory Findings of Significance

CEQA requires lead agencies to determine if proposed projects would "substantially degrade" environmental quality, wildlife habitat of a fish or wildlife species, threaten a plant or animal community, or eliminate important historical or prehistorical resources. Agencies must also evaluate whether a proposed project will have cumulatively considerable impacts when combined with the effects of other past, current, or future projects. Finally, agencies must consider whether a proposed project would have environmental effects causing "substantial adverse effects" on human beings. (CEQA Guidelines, App. G.)

The NOP does not contain this analysis. Given that the Project, particularly Alternatives A and C, will affect sensitive lagoon and wetlands resources, such analyses are critical. Moreover, the potential air quality and noise impacts discussed above could impose substantial adverse health and quality-of-life impacts on regional communities. SANDAG must perform comparative analyses of each Project alternative so that stakeholders are able to easily understand the relative impacts of each alternative and their respective significance.

B. <u>Substantive Concerns with the NOP</u>

1. No Accurate, Stable, and Finite Project Description

An "accurate, stable and finite" project description is indispensable to an informative and legally sufficient CEQA document. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.) CEQA documents that contain "curtailed or distorted" project descriptions prevent the public and decision-makers from fully and accurately evaluating a project's benefits and costs, applying appropriate mitigation measures, and evaluating other alternatives proposed. (*Id.* at pp. 192-93.) A project description that sends "conflicting signals to decision makers and the public

about the nature and scope of the project is fundamentally inadequate and misleading." (*Washoe Meadows Community v. Dept. of Parks & Recreation* (2017) 17 Cal.App.5th 277, 287.) Indeed, "a curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (*Id.* at p. 288.) An adequate project description must contain the "precise location and boundaries" of the proposed project, a list of project objectives, descriptions of the project's technical, economic, and environmental characteristics, and identification of applicable agencies, permits, approvals, and decisions implicated by the project. (Cal. Code Regs., tit. 14, § 15124; hereafter CEQA Guidelines.)

The NOP's project description is not accurate, stable, or finite, and prevents the public and decision-makers from fully understanding the scope of the Project, the potential impacts, appropriate mitigation measures, and true alternatives. Indeed, the project description does not describe a single "project," but rather three separate projects, Alternatives A, B, and C, all have different locations and different potential impacts, and would require distinct mitigation measures. The NOP fails to identify which of these alternatives is the preferred option, and none of the alternatives contains fixed geographic locations, technical details, or clear descriptions of potential environmental, social, and economic impacts. Although SANDAG insists these details will be provided in the Draft Environmental Impact Report (DEIR), the DEIR is only due in 2025 or 2026, and SANDAG's decisions not to identify a preferred alternative and provide more details about each alternative are already creating the problems described: the NOP sends the public and decision-makers conflicting signals about which alignment is SANDAG's preferred alternative, omits the actual details of the alignments, and confuses stakeholders about whether they should respond to one of the alternative alignments provided, or all three. Moreover, the alternative alignments have not received equal engineering evaluations, leaving the public to speculate whether some alternatives are "red herrings" that are not seriously being considered.

Even the Project's name is unstable and has shifted over time. The NOP describes the Project as the "San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project," but SANDAG has also described the Project at public meetings as a project to "connect Sorrento Valley to Solana Beach." The connection between Sorrento Valley and Solana Beach currently exists, so it is unclear what this project name references. We recommend that SANDAG revise the NOP to identify a stable, preferred alternative alignment, and provide additional details about the preferred alternative and other alternatives so that all stakeholders have a firm understanding of what the actual project is and where they should focus their evaluations and comments.

Finally, the Project Description must include details of what will happen to the existing rail line after completion of the Project and analyze the removal and/or reuse of the areas/properties that would be vacated or disposed of as part of this project.

2. The NOP Does Not Contain a Reasonable Range of Feasible Project Alternatives

CEQA requires that environmental analyses identify a preferred project as well as reasonable and feasible alternatives to the preferred project, especially alternatives that would reduce a preferred project's significant environmental impacts. The CEQA Guidelines specifically explain that environmental documents "shall 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…." (Guidelines, § 15126.6, subds. (a), (c).) The range of alternatives must be sufficient to encourage "informed decision-making and public participation," and the agency must disclose why it selected or removed alternatives from consideration. (*Id.* at subd. (a).) Suitable alternatives are those that reduce significant environmental effects, attain most project objectives, and are feasible, reasonable, and realistic. (*Id.* at subd. (c).) The feasibility of an alternative may be analyzed using factors such as site suitability, economic viability, availability of infrastructure, and other pending plans and projects. (*Id.* at subd. (f)(1).) The selection and analyses of alternatives is governed by a "rule of reason" requiring that only feasible alternatives that meet most project objectives, while avoiding or lessening environmental impacts, be thoroughly considered in the environmental documents. (*Id.* at subd. (f).)

The NOP's range of three alternatives is inexplicable. Specifically, the inclusion of Alternative A in the NOP instead of other alternatives that were rejected lacks substantial evidence and is not explained by any "rule of reason." First, Alternative A meets only four of the six Project objectives identified by SANDAG,[1] while Alternatives B and C meet all six Project objectives. Moreover, Alternative A also meets fewer Project objectives than *eleven* other alternatives that were excluded from the NOP. Of these eleven alternatives, *ten* met all six of the Project objectives. SANDAG determined that four of these ten were worth further evaluation based on duplicative features. Despite the fact that all four alternatives were shorter, required fewer truck trips, affected less public open space and recreational lands, caused fewer utility conflicts, and were cheaper than Alternative A, Alternative A was chosen instead of these alternatives. SANDAG does not provide substantial evidence justifying inclusion of Alternative A over other alternatives that were all environmentally superior according to SANDAG's own criteria, and the decision is devoid of reason.

Second, an earlier version of Alternative A was explicitly rejected by SANDAG in prior analyses. The agency concluded in the August 2023 report that an alignment practically identical to Alternative A, requiring digging tunnels beneath the Fairgrounds and San Dieguito Lagoon, was "impractical" for myriad reasons, including that it required deepening trenches "through most of Solana Beach," lowering the Solana Beach train station, relocating the Fairgrounds' special events platform into the underground tunnel, abandoning the newly built San Dieguito Bridge, reconstructing the Via de la Valle overpass, digging in Stevens Creek, damming the San Dieguito River, and imposing permanent infrastructure and utilities on Fairgrounds property. Therefore, not only was Alignment A included in the NOP instead of environmentally superior alternatives meeting all Project objectives, but Alignment A was included even though SANDAG had concluded less than a year earlier that it was "impractical" and infeasible. SANDAG has not explained why an alternative that it rejected less than a year ago was somehow included in the NOP's final three alternatives.

Third, inclusion of Alternative A alongside Alternatives B and C is nonsensical, given the comparative analyses and studies that have been invested in each alternative. Specifically, while Alternatives B and C have been designed to a ten percent conceptual engineering level, Alternative A has only received about 1 percent conceptual engineering design review. Moreover, the ten alternatives meeting all six Project objectives, but excluded from the NOP, had also received at least ten percent engineering design review. SANDAG does not provide any logical reasoning for why it included in the NOP's final three alternatives an alignment that

[1] The City notes that Alternative A probably only meets three or fewer Project objectives, not four.

has received less study and design review than multiple other excluded alternatives that had received more technical analysis and review.

In sum, the range of alternatives included for final consideration in the NOP is not reasonable or feasible. Specifically, the inclusion of Alternative A when compared to Alternatives B and C is illogical—Alternative A is inferior to Alternatives B and C according to SANDAG's own objective measures, so why has it been included alongside these alternatives? Moreover, the inclusion of Alternative A at the expense of other excluded alternatives has no rational basis. Multiple alternatives that were environmentally superior, more feasible, and that aligned with all six Project objectives were excluded from further consideration, but an alternative that entails more air quality impacts from truck trips, more impacts to public lands, meets fewer Project objectives, and that SANDAG considered prohibitively "impractical" less than a year ago was included in the final three NOP alternatives. For these reasons, the inclusion of Alternative A alongside Alternatives B and C, and at the expense of superior alternatives, is not justified by any "rule of reason," lacks substantial evidence, and frustrates informed decision-making and public participation.

3. The NOP's Lack of a Preferred Alternative Obscures the Project's Cumulative Impacts

"Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (CEQA Guidelines, § 15355.) CEQA analysis must include discussion of the "cumulatively considerable" significant impacts of a proposed project combined with the related impacts of other pending nearby projects. (CEQA Guidelines, § 15130, subd. (a).) Discussion of other projects causing related impacts may take the form of a list of past, present, and future probable projects, or a summary of growth and development projections in a state, regional, or local planning document. (*Id.* at subd. (b)(1).) The discussion must also define and explain the geographic area that would be affected by the cumulative impacts of the proposed project and other pending projects. (*Id.* at subd. (b)(3).) The discussion of cumulative impacts should be reasonable and practical, but must be more substantive than a mere conclusion unsupported by evidence or analysis. (*Id.* at subd. (b); *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, 411.)

SANDAG explains that discussion of cumulative impacts of the Project and other past, current, and future projects will be contained in the DEIR. However, in this case, the lack of any cumulative impacts discussion in the *NOP* is already causing confusion and concern, and is undermining the CEQA's goals of informing decision-makers and the public about the potential cumulative impacts of the Project. The NOP's identification of three distinct alternatives, without identifying a preliminary preferred alternative or an environmentally superior alternative, requires stakeholders to postulate as to the cumulative impacts of three potential projects, not one. The three alternatives have different geographic locations, affect different resources and communities, and have unequal environmental impacts. They all consequently will have different related nearby projects and associated cumulative impacts. Which ones should decision-makers and the public evaluate?

Moreover, the unequal conceptual design status of the various alternatives, with Alternative A receiving only one percent design review compared to Alternatives B and C's ten percent design review, suggests that an equal and defensible cumulative impacts comparison

between the various alternatives cannot even be performed. How can reliable inferences and conclusions be drawn about the cumulative impacts of a project that has received only one-tenth of the design review of the other alternative projects?

Perhaps acknowledging these problems, the NOP lacks any discussion whatsoever of the three alternatives' cumulative impacts. Nor did SANDAG's 2023 and 2024 alignment screening assessments contain any thorough discussion of cumulative impacts. However, it was possible to produce preliminary cumulative impacts discussions in the NOP because the prior screening reports contained some discussion of other projects that would be affected by the various alignments. For example, both screening reports discuss how Alternative A would require destruction and potential re-use of the San Dieguito Bridge and Fairgrounds special events platform facilities, but there is no mention in the NOP about what the combined cumulative air quality, traffic, noise, and other impacts would be caused by construction of Alternative A concurrently with the destruction of these facilities, nor what the combined years-long cumulative impacts might be if the projects were not constructed or deconstructed concurrently. Similar analyses are missing for Alternatives B and C.

The City notes that the NOP's failure to identify a preferred and/or environmentally superior alternative in the NOP, and the unequal analysis of those three alternatives, makes a truly reliable understanding of the actual Project's potential cumulative impacts impossible. Nevertheless, the NOP still fails to even attempt to describe the various potential cumulative impacts of each alternative, even though SANDAG's earlier analyses contain sufficient information to produce preliminary predictions. The NOP's failure to identify a preferred alternative, and its lack of any preliminary cumulative impacts discussion, has undermined CEQA's goals of informing stakeholders about potential cumulative project impacts, and has instead created confusion and uncertainty. Therefore, the City urges SANDAG to remove Alternative A, and we reiterate our offer to work with all regional stakeholders to meet our regional goals.

C. Concerns Regarding Inadequate Public Engagement

The City has acute and urgent concerns about SANDAG's public engagement process for the NOP. Specifically, the City is troubled that the vast majority of public engagement conducted by SANDAG prior to release of the NOP occurred with just one stakeholder, the City of Del Mar. Indeed, SANDAG's own NOP validates these concerns by documenting the extensive outreach provided to Del Mar residents and officials—the NOP identifies at least four occasions between July 2023 and February 2024 when SANDAG engaged with the Del Mar community specifically. There is no documentation of any corresponding outreach to the City of Solana Beach, nor to the City of San Diego, the 22nd Agricultural District, the Fairgrounds operators, the trustees of the San Dieguito and Los Peńasquitos Lagoons, nor any other stakeholder potentially affected by the Project—besides Del Mar.

Moreover, the May 2024 alignment screening report discloses that the "stakeholder" alignments that were evaluated in the screening report were sourced from the very same meetings with Del Mar described above, although residents of Carmel Valley and the Torrey Pines Community Planning Board were also ostensibly provided with one engagement event each. Solana Beach was not engaged at all during this time. These facts indicate that the "stakeholder" alignments evaluated in the May 2024 screening report were most likely added solely by the residents and officials from Del Mar, including the Alternative A alignment that

SANDAG's 2023 study had concluded was "impractical" and infeasible. Astoundingly, SANDAG's first official engagement with Solana Beach officials and residents about the Project occurred on June 26, 2024, almost a month *after* the NOP was released and *after* the Alternative A alignment proposed by the Del Mar stakeholders was included as one of the NOP's three final alternatives.

For these reasons, the NOP's range of alternatives is not only substantively problematic from technical, legal, and feasibility viewpoints, but it is also tainted by an unfair and prejudiced public engagement process that resulted in unevenly analyzed alternatives, misrepresentation of the various alignments' potential impacts, and a sense that SANDAG's decisions about the final three alternatives were motivated by factors other than feasibility and potential impacts. Informed decision-making and public participation are fundamental goals of the CEQA process, and the purpose of the statute is "to inform the public and its responsible officials of the environmental consequences of their decision before they are made." (*Friends of the Eel River v. North Coast Railroad Authority* (2017) 3 Cal.5th 677, 713.) However, in this case, SANDAG's failure to meaningfully engage with all stakeholders in developing the NOP and the Project has left excluded stakeholders like the City frustrated that decisions about the Project are being made without their input and with a poor understanding of the various alternatives' potential consequences.

SANDAG can rectify these problems by meaningfully implementing the multi-jurisdictional stakeholder value analysis that was directed to be performed by the SANDAG Board of Directors on June 28, 2024. If SANDAG uses this value analysis to engage in thorough dialogue with *all* stakeholders, and to revise the NOP to reflect a wider, more feasible, and more-thoroughly analyzed range of alternatives, the problems of the agency's public engagement process may be mitigatable.

The City believes that a reasonable and feasible alignment for the Project can be selected that minimizes harm to local communities and sensitive natural and cultural resources, while meeting most or all of the Project objectives. However, the NOP released by SANDAG in June 2024 does not present a feasible range of alternatives, and the project description and analyses thus far have created confusion and concern about the nature of the Project and its potential impacts. The City urges SANDAG to remove Alternative A. We reiterate our offer and our commitment to explore a more environmentally, socially, and economically viable alternative for the rail realignment project, and recommend that SANDAG revise the NOP to include more analysis so that truly informed decisions can be made about this far-reaching Project.

Sincerely,

Alyssa Muto
City Manager

Attachments: 06.30.2025 LOSSAN Del Mar Realignment NOP Commentx.pdf

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From: Jason Jewell <jjewell@octa.net>
Sent: Wednesday, July 2, 2025 5:11:45 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Tim Pesce <Timothy.Pesce@sandag.org>; James Campbell <jcampbell@octa.net>; David Berryman <DBerryman@octa.net>; Chris Orlando <corlando@octa.net>
Subject: SDLRR Project NOP

Good morning,

Attached, you will find our submittal for the rail realignment project.

Thank you,

JASON L. JEWELL
Managing Director
LOSSAN Rail Corridor Agency
phone ☎ (714) 560-5086 • *e-mail* ✉ jjewell@octa.net

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LOS SAN
MANAGING AGENCY
PACIFIC SURFLINER

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P.O. Box 14184
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MEMBER AGENCIES

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BNSF Railway

California Public Utilities Commission

Southern California Regional Rail Authority

Union Pacific

June 30, 2025

Mr. Tim Pesce
San Diego Association of Governments
1011 Union Street
Suite 400
San Diego, CA. 92101

RE: SDLRR Project Updated NOP Comment

Dear Mr. Pesce,

On behalf of the Los Angeles – San Diego – San Luis Obispo (LOSSAN) Rail Corridor Agency (Agency) I would like to express our support of the overall efforts by the San Diego Association of Governments (SANDAG) to identify and implement long-term solutions for addressing the coastal resiliency challenges facing the LOSSAN rail corridor.

The recent updated Notice of Preparation (NOP) for the Draft Environmental Impact Report for the LOSSAN Rail Realignment project that was released by SANDAG presents four alternative alignments for addressing the long-term resiliency needs along the Del Mar Bluffs. Comments on these alignment alternatives have been requested by SANDAG. There is not sufficient information provided on the alternatives to be able to offer specific comments on potential impacts or benefits of each alignment to the Pacific Surfliner service at this time.

As such, the LOSSAN Agency will defer any specific comments until a more robust analysis can be performed. At a minimum, the LOSSAN Agency will require the following information for each alternative alignment, including narratives and comparison tables, to assist in our ability to evaluate the alternatives from the perspective of Pacific Surfliner service.

- Track geometry and speeds
- Tunnel types and length
- Tunnel ventilation plan
- Tunnel Evacuation Plan – Fire, Life, Safety
- Freight considerations
- Length of alignments
- Environmental and right of way impacts
- Proposed construction plans
- Special Event Station location, length, and passenger access plan

- Tunnel maintenance requirements

For the alignment alternatives that require a tunnel, we request that consideration be given to various zero emission technologies, including but not limited to hydrogen. The Pacific Surfliner is a state-supported intercity passenger rail service, which utilizes equipment that is owned or leased by the California Department of Transportation (Caltrans). Caltrans is currently focusing their zero emission strategies for intercity passenger rail around the use of hydrogen fuel cells. This is reflected in their recent procurement of 10 hydrogen fueled multiple-unit trainsets, and the option for 19 more. While it is not yet confirmed where these units will ultimately operate, this project should not preclude the ability for these zero emission trainsets to operate along the LOSSAN corridor through San Diego County.

The LOSSAN Agency looks forward to continuing to coordinate with SANDAG on this project, to ensure proper analysis is conducted on all alternative alignments sufficient to allow a determination of the benefits and impacts to Pacific Surfliner intercity rail service in relation to each alignment.

Sincerely,

Jason Jewell
Managing Director

cc: Chris Orlando, LOSSAN Deputy Managing Director
James Campbell, LOSSAN Operations Officer
David Berryman, LOSSAN Capital Program Manager

NATIVE AMERICAN HERITAGE COMMISSION

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nahc@nahc.ca.gov

May 27, 2025

Tim Pesce
San Diego Association of Governments
1011 Union Street
Suite 400
San Diego CA 92101

Re: 2024060038 Updated NOP of a Draft EIR for the LOSSAN SDLRR Project, San Diego County

Dear Mr. Pesce:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

a. A brief description of the project.

b. The lead agency contact information.

c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).

d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project.

b. Recommended mitigation measures.

c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

a. Type of environmental review necessary.

b. Significance of the tribal cultural resources.

c. Significance of the project's impacts on tribal cultural resources.

d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@NAHC.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

Attachments: image001.png
SANDAG - SDLRR NOP Comments.pdf

From: Taylor Siwy <tsiwy@nctd.org>
Sent: Monday, June 30, 2025 6:47:43 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Mario Orso <mario.orso@sandag.org>; Maria Rodriguez Molina <Maria.RodriguezMolina@sandag.org>; Shawn Donaghy <sdonaghy@nctd.org>; Lori Winfree <lwinfree@nctd.org>; Mary Dover <mdover@nctd.org>; Tracey Foster <tfoster@nctd.org>; Scott Shroyer <sshroyer@nctd.org>
Subject: Updated Notice of Preparation of a Draft Environmental Impact Report for the LOSSAN Rail Realignment Project

Hello,

Please see attached for the letter regarding an Updated Notice of Preparation of a Draft Environmental Impact Report for the LOSSAN Rail Realignment Project.

Thank you,

Taylor Siwy
Senior Administrative Assistant/Deputy Clerk
810 Mission Avenue | Oceanside, CA 92054
Cell: 760-458-0061 | Office: 760-966-6553 | GoNCTD.com
NORTH COUNTY TRANSIT
SAN DIEGO RAILROAD

June 30, 2025

Tim Pesce
Senior Environmental Planner
San Diego Association of Governments
1011 Union Street
Suite 400
San Diego, CA 92101
Sent Via Electronic Mail: LOSSANcomments@sandag.org
(Electronically Transmitted - No hard copy will follow)

Re: Updated Notice of Preparation of a Draft Environmental Impact Report for the LOSSAN Rail Realignment Project

Dear Tim Pesce:

The North County Transit District, operating as North County Transit – San Diego Railroad (referred to herein as NCTD, provides the following comments in response to the San Diego Association of Governments' (SANDAG) Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment Project (Project). NCTD appreciates the opportunity to provide input during this critical stage of the environmental review process.

NCTD is designated as a responsible agency under the California Environmental Quality Act (CEQA) as NCTD owns the San Diego Subdivision of the LOSSAN Corridor from the northern border of San Diego County to the southern limits of the City of Del Mar and has approval authority over the Project (14 Cal. Code Regs §15381). NCTD is the Railroad of Record responsible for maintenance of the entire San Diego Subdivision as designated by the Federal Railroad Administration (FRA). Through Shared Use Agreements, NCTD assumes responsibility to ensure the San Diego Subdivision is usable by Amtrak intercity rail service and BNSF Railway freight rail service. NCTD also operates the COASTER commuter rail service through the Project area.

In response to the NOP, NCTD would like to encourage SANDAG's consideration of the following during the development of the DEIR for each proposed Project alternative:

Surface Transportation Board Approval for Construction and Abandonment:
In general, as SANDAG considers Project alternatives, NCTD urges SANDAG to consider involvement with the Surface Transportation Board (STB). NCTD operates the existing rail line pursuant to authorization by the STB under 49 U.S.C. § 11323.

Amtrak currently operates on the existing line pursuant to 49 U.S.C. § 24308, which permits Amtrak to enter into an agreement with a rail carrier or regional transportation authority—such as NCTD—for the use of facilities and provision of services under mutually agreed-upon terms. BNSF operates on the existing line under a Reserved Freight Easement.

As a representative of NCTD, SANDAG will be required to obtain approval from the STB under 49 U.S.C. § 10901 in order to construct a new rail line. Additionally, NCTD and BNSF will need to seek STB approval under 49 U.S.C. § 10903 to abandon the existing line and discontinue rail operations, should such abandonment be determined to be in the best interests of the involved railroads.

Concerns Regarding Limited Information:

NCTD notes that the NOP lacks sufficient detail on certain aspects, which hinders NCTD's ability to fully assess the potential alternatives and their respective impacts on rail transportation. NCTD will require a review of Project documents to determine whether the Project can be permitted and is operationally feasible for all forms of rail transportation before SANDAG's design is finalized and construction can commence on NCTD's right-of-way. The following information is necessary for a thorough evaluation of each alternative:

- More detailed descriptions of the Project components, including specific locations (mileposts, control points, etc.), sizes, and operational details.
- Clarification on the phases of the Project, including timelines for construction.
- Clear descriptions of all potential Project alternatives being considered, including their locations and designs.
- Comparative analyses of the environmental impacts of each alternative.

Transportation Issues to be Addressed:

As SANDAG begins preparing the DEIR for the Project, NCTD encourages SANDAG to thoroughly evaluate transportation-related issues for each alternative under consideration, including the No Build alternative. The DEIR should assess the potential transportation-related impacts of each alternative and SANDAG should evaluate the feasibility, costs, and engineering challenges associated with various alignment options. In particular, the following issues must be addressed through the DEIR:

- **Impact to Operations (During Construction)**

  SANDAG must consider and minimize the impacts of each alignment on rail operations during construction. Amtrak Pacific Surfliner, COASTER commuter rail and BNSF freight service operate through the Project area. NCTD, as the owner of the majority of the railroad right-of-way impacted by the Project, is contractually obligated to maintain use of the corridor for Amtrak and BNSF.

- **Operational Complexities (Post-Construction)**

  The operational complexity of the Project's elements, including, but not limited to, the tunnel, ventilation systems, and train control systems, must be considered and operational feasibility for all forms of rail transportation must be included in the design and construction.

- **Operations and Maintenance Costs**

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(760) 967-2001 (fax)
GoNCTD.com

Cost analyses of all alternatives shall consider the life cycle cost of the Project, to include anticipated operation and maintenance costs for the expected life of the constructed assets. Information on the expected useful life of each proposed alignment should also be included.

- **Transit Connectivity**

  Connection to existing transit centers, such as Solana Beach Station and Sorrento Valley Station, as well as the future Fairgrounds Special Events Station (which is fully funded and expected to start construction in 2025) shall be considered.

- **Travel Time**

  The impact to overall travel times on the corridor should be analyzed. Under the terms of the Shared Use Agreements with Amtrak and BNSF, NCTD must ensure that any realignment projects do not increase the overall travel time on the corridor. Therefore, alternatives that increased travel times shall not be considered.

Significant Environmental Issues to Be Addressed and Mitigation Measures to Be Considered:

For all potential alternatives, SANDAG must address the following environmental issues, among others, in the DEIR and explore corresponding mitigation measures:

Environmental Issues

- Air Quality and Greenhouse Gas Emissions
- Noise and Vibration
- Traffic and Transportation
- Biological Resources
- Water Quality and Hydrology

Mitigation Measures

- Noise and Vibration Mitigation
- Air Quality and Emissions Control
- Traffic and Safety Improvements
- Habitat Protection and Restoration

As a responsible agency, this letter fulfills NCTD's obligation to provide the lead agency with written specifications as to the scope and environmental information necessary for inclusion in the DEIR for NCTD to complete its review of the Project (Pub. Res. Code § 21080.4(a); 14 Cal Code Regs §§15082(b), 15096(b)(2)). NCTD strongly encourages SANDAG to address these issues comprehensively in the DEIR to ensure that the Project's environmental impacts are adequately assessed and mitigated.

NCTD appreciates the opportunity to provide comments on the NOP for the Project. Should you have any questions, please do not hesitate to reach out to Tracey Foster, Chief Development Officer, at tfoster@nctd.org or 760-966-6674.

Sincerely,

Shawn M. Donaghy
Chief Executive Officer

cc: Mario Orso, Chief Executive Officer, SANDAG
Maria Rodriguez-Molina, Director of Mega Projects, SANDAG
Lori A. Winfree, Deputy Chief Executive Officer and Chief General Counsel, NCTD
Mary Dover, Chief of Staff, NCTD
Tracey Foster, Chief Development Officer, NCTD
Scott Shroyer, Director of Engineering, NCTD

810 Mission Avenue
Oceanside, CA 92054
(760) 966-6500
(760) 967-2001 (fax)
GoNCTD.com

Attachments: image001.png
SDLRRNOPresponseLtr_06.23.2025_FINAL_signed.pdf

From: Nathan Lacy <nathan@sdrp.org>
Sent: Monday, June 23, 2025 8:52:47 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Shawna Anderson <shawna@sdrp.org>; Dewanda Vandermost <dewanda@sdrp.org>
Subject: SDLRR Project NOP

Hi Tim,

Hope your week is off to a great start, I wanted to provide you with the written comments from the San Dieguito River Park Joint Powers Authority regarding the updated SDLRR Project NOP. Please find a PDF of the comment letter attached within.

Let me know if you have any questions or concerns, hope you have a great week ahead.

Best,

Nathan Lacy, AICP (he/they)
Environmental Planner
San Dieguito River Park Joint Powers Authority
18372 Sycamore Creek Rd, Escondido, CA 92025
858-674-2270 x15 nathan@sdrp.org

SAN DIEGUITO
RIVER PARK

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

June 23, 2025

Tim Pesce
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Subject: Response to Updated SDLRR Project NOP

Dear Mr. Pesce:

Thank you for notifying the San Dieguito River Park Joint Powers Authority (JPA) regarding the updated Notice of Preparation (NOP) for this project. The JPA staff has followed the progression of this proposed project over the last several years, including throughout the previous 2024 Notice of Preparation (NOP) scoping period.

Four build alternative alignments are proposed for analysis in the updated NOP. Of the four build alternative alignments, three include tunnelling and have common components including a north and south portal, a bored tunnel connecting the portals, and double tracking of the rail line. These have been deemed the "Tunnel Alternatives". A fourth alternative alignment that does not include a tunnel or portals was deemed the "Non-Tunnel Alternative". A fifth alternative includes the No Project alternative, which is not a build alternative. Three of the five total proposed updated alignment alternatives pass through the San Dieguito River Park's Focused Planning Area (FPA), and all of the alternatives have the potential to impact resources within the JPA's jurisdiction.

The NOP includes a note for a modified alternative "San Dieguito Bridge to I-5": "*A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process." This is described as a "northerly variation" which is assumed to follow the northern bank of the lagoon and then connect to the I-5 knoll. The JPA feels that it is somewhat unusual for an NOP to include a project alternative that is not visually depicted and cannot comment on this "northerly variation" without more information.

San Dieguito River Park Concept Plan

As stated in the San Dieguito River Park's Concept Plan (SDRP Concept Plan), the goals and objectives include: *the preservation of open space, conservation of sensitive resources, protection of water resources, preservation of the natural floodplain, retention of agricultural uses, creation of recreational and educational opportunities.* The alignment alternatives being considered for the rail relocation project overlap with Landscape Unit A – Del Mar Coastal Lagoon, one of fourteen landscape units, and would potentially impact the natural and recreational resources within the SDRP including the Coast to Crest Trail (CTC Trail).

The San Dieguito Lagoon sits within the Del Mar Coastal Lagoon landscape unit that represents the western gateway to the San Dieguito River Valley. This landscape unit is characterized by its broad floodplain, scenic coastal views, and rare wetland ecosystem. Over $200 million of public funds have been invested in the protection and restoration of the San Dieguito Lagoon as a regional environmental resource that also serves as a protective measure against catastrophic flooding and sea level rise. Recent efforts to restore the ecological function and vitality of the San Dieguito Lagoon include restoring over 150 acres of tidal wetland habitat in 2012 and restoring another 80 acres of salt marsh and other habitats as part of the Phase II wetland restoration project completed in June 2024.

We believe it is appropriate that the updated SDLRR Draft EIR address the following issue areas regarding the San Dieguito River Park:

- Land use
- Recreation and public facilities
- Aesthetics and viewsheds
- Wildlife corridor continuity
- Impacts to the San Dieguito Lagoon and associated wetlands including *protection against future sea level rise; impacts to sensitive species, wildlife and habitat areas; and protection of surface water quality, groundwater, and hydrologic resources*
- Noise
- Portal and right-of-way landscaping
- Trail compatibility and continuity

Please see below for further explanation of issues and suggested analysis regarding the proposed project:

Issues and Analysis

Project description:
The project description within the updated DEIR should include detailed project information and illustrations for each alignment alternative design, including specific locations and design details of all project components (e.g., tunnel portals, aerial structures, and floodwalls) at a scale that enables a clear understanding of their location and design, construction details and methods, project timeline, costs, project operation, and maintenance requirements, etc. The description should also include a comparison of the preferred project with the other alternative alignments. The preferred project should include a detailed description of project features incorporated into the proposed project to reduce environmental impacts including impacts to existing public amenities and resources.

Land use:
The project area includes the San Dieguito Lagoon and other resources within Landscape Unit A (Del Mar Coastal Lagoon) of the San Dieguito River Park as addressed in the SDRP Concept Plan. We ask that SANDAG evaluate the proposed project's consistency with the SDRP Concept Plan and other relevant public agency programs and plans.

Recreation and public facilities:

Multiple recreational areas and public facilities overlap with the scope of the alignment alternatives described in the updated NOP. These include the CTC Trail, boardwalk trail, Grand Avenue Overlook, Crest Canyon, and the publicly owned open space associated with the San Dieguito Lagoon and river valley, as well as SANDAG's planned Interstate-5 bikeway and connection to the CTC Trail. Additionally, the San Dieguito Bridge to I-5 Alternative along with the potential northerly design option may affect the JPA's proposed Reach the Beach trail extension and the City of Del Mar's proposed Living Levee project.

The DEIR should include details about each of the alignment alternatives regarding effects on recreational uses and areas. The DEIR should address how existing and proposed public facilities would be affected by each of the alignment alternatives, including whether certain facilities would no longer be usable or feasible or would require modification or removal. Additionally, the DEIR should include detailed mitigation measures for project impacts to recreational areas and public facilities.

Aesthetics and viewsheds:
The alignment alternatives and associated project components like aerial structures, floodwalls and U-section tunnels have the potential to affect the viewshed of the San Dieguito lagoon area and public views along the trail system. Additionally, it is noted that San Dieguito Bridge to I-5 Alternative along with the potential northerly design option may include an aerial structure (e.g., bridge).

The DEIR should analyze these issues and explain the consistency of the proposed project with Part II of Appendix D of the SDRP Concept Plan and land use plans for the area, including height limits and aesthetics. Scaled diagrams and visualizations should be included to clearly illustrate the visibility of project components and how they would affect public views to Stevens Creek, the San Dieguito Lagoon and inlet, and Crest Canyon and how these aesthetic resources would be altered by the project. Additionally, the DEIR should include mitigation measures for design features and details of any project components that may partially or fully mitigate any significant impacts, as appropriate.

Wildlife corridor continuity:
The San Dieguito Lagoon and surrounding canyons and tributaries are part of a critical wildlife corridor, and the alignment alternatives may affect the continuity and function of the wildlife corridor.

The DEIR should analyze the potential impacts of each alignment alternative on the wildlife corridor including wildlife movement and direct and indirect impacts such as noise and vibration that would reduce the quality and function of the corridor. Impacts should be identified and explained for each phase of the project including construction, operation and maintenance. Proposed mitigation measures to address significant impacts must include sufficient detail to assess their effectiveness on the long-term function of the existing wildlife corridor.

Impacts to the San Dieguito Lagoon and associated wetlands:
The San Dieguito Lagoon, a regional resource that contains sensitive species, fish nurseries, and vital habitat areas, overlaps with all alignment alternatives, and may be affected by the project. The San Dieguito Lagoon, San Dieguito River, Stevens Creek, and the San Dieguito

Creek Groundwater Basin and associated surface water quality and groundwater/hydrologic resources may be affected by the project's design components.

The DEIR should analyze how the project would affect and be affected by sea level rise within the Lagoon and wetland areas, evaluate the project's impacts to sensitive species, fish nurseries, and wildlife habitat, and how the project would protect surface water quality and groundwater/hydrologic resources. Additionally, the DEIR should address how the project tunnel excavations may affect the hydrogeomorphology of groundwater basins and tidal zones. The DEIR should also include details for mitigation measures to address significant impacts.

Noise and Vibration:
The Under Crest Canyon and Under Camino Del Mar alternatives may include a proposed northern tunnel portal near the San Dieguito Lagoon inlet. In addition, the San Dieguito to I-5 Alternative may include a portal under Racetrack View Drive and cut and cover tunnelling along the southern edge of the lagoon and the entrance to the Crest Canyon Trail. Noise, vibration, and visual blight from rail construction and operations related to rail cars along surface alignments and entering and exiting the tunnels may affect sensitive wildlife and CTC trail user experience.

The DEIR should analyze how the project may affect ambient noise levels, vibration magnitude, and other sensory experiences within the northern tunnel entrance areas. Additionally, the DEIR should include mitigation measures for noise and vibration and details of any project features that may partially or fully mitigate any significant impacts, as appropriate.

Portal and right-of-way landscaping:
The proposed project will likely require changes to existing landscaping and vegetation communities within the right-of-way and tunnel portals for each alignment alternative. Proposed landscaping should conform to the SDRP Concept Plan including the usage of native species to match existing vegetation communities.

The DEIR should analyze how the project's landscaping and design would affect existing and surrounding vegetation communities and habitat value. Additionally, the DEIR should include mitigation measures for vegetation impacts and details of any project features that may partially or fully mitigate any significant impacts, as appropriate.

Trail compatibility and continuity:
The CTC Trail and River Path Del Mar overlap with all alignment alternatives. Additionally, SANDAG's North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Plan (PWP) includes a package of highway, rail, transit, bike/ pedestrian, environmental and coastal access improvements located along the North San Diego County coastline and describes an array of public access improvements throughout the corridor, including a CTC Trail crossing at the San Dieguito railroad track on the north side of the river. The crossing is required to be phased with replacement and double tracking of the San Dieguito LOSSAN project. The crossing location shown in the PWP on the north side of the river (i.e., adjacent to the Fairgrounds) and identified as Community Enhancement DM#1 in the PWP is consistent with the JPA's CTC Trail "Reach the Beach" Feasibility Study.

The DEIR should analyze how the project would impact existing public trail resources within the project area including trail usage and experience and connectivity. The analysis should describe temporary impacts during construction activities and permanent impacts to trail routes or useability. For example, the DEIR should analyze how each alignment alternative may affect trail user experience as well as how each would affect existing infrastructure/trail alignments, and the improvements proposed in SANDAG's PWP. The DEIR should include details of any proposed mitigation measures that would address any significant impacts, as appropriate.

Regarding the aforementioned issues, this project has the potential for significant impacts to the San Dieguito River Park including the lagoon and river valley. The Draft EIR must be of sufficient detail to fully understand the project's potential impacts and whether they can be mitigated or would cause irreversible harm and enable SANDAG to make an informed decision on the least environmentally damaging project alignment.

Furthermore, as mentioned above, SANDAG conducted outreach within stakeholder communities, where a northerly design concept to the San Dieguito Bridge to I-5 alternative alignment was described. We ask that any and all future variations and design options be explained and shared with the public so that stakeholders can provide pertinent and informed feedback throughout the scoping process.

Thank you for considering our comments and keeping the JPA informed on this project, and we look forward to receiving the Draft EIR.

Sincerely,

Shawna Anderson, AICP
Executive Director

Reference:
San Dieguito Concept Plan (adopted 1994, revised 2002). Available at:
https://www.sdrp.org/docs/

Attachments: image001.png
image002.png
image003.png
image004.png
2024060038_LOSSAN_UpdatedNOP_SLC.pdf

From: Tuohy, Robin@SLC <Robin.Tuohy@slc.ca.gov>
Sent: Thursday, June 26, 2025 4:08:19 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: state.clearinghouse@lci.ca.gov <state.clearinghouse@lci.ca.gov>; Dobroski, Nicole@SLC <Nicole.Dobroski@slc.ca.gov>; Borack, Alexandra@SLC <Alexandra.Borack@slc.ca.gov>
Subject: SDLRR Project NOP- SCH 2024060038 Comment Letter

To Mr. Tim Pesce,

Please find the attached CSLC comments for the *Updated Notice of Preparation for an Environmental Impact Report for San Diego-Los Angeles-San Diego-San Luis Obispo Rail Realignment Project*.

Thank you for providing us the opportunity to comment.

Kind Regards,

Robin Tuohy, M.S. *(she/hers)*, Environmental Scientist
DESPM, CEQA Implementation and Management
CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100-South
Sacramento CA 95825
Robin.Tuohy@slc.ca.gov
Phone: 916.574.0900
Work Hours: Monday– Friday, 7:30 a.m.- 4:30 p.m.

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June 30, 2025

File Ref: SCH # 2024060038

SANDAG
Attn: Tim Pesce
1011 Union Street, Suite 400
San Diego, CA, 92101

VIA ELECTRONIC MAIL: LOSSANcomments@sandag.org

Subject: Updated Notice of Preparation for an Environmental Impact Report for San Diego-Los Angeles-San Diego-San Luis Obispo Rail Realignment Project, San Diego County

Dear Tim Pesce:

The California State Lands Commission (Commission) staff has reviewed the subject Updated Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment Project (Project), which is being prepared by the San Diego Association of Governments (SANDAG). SANDAG has been assigned the responsibility for planning, funding allocation, Project development, and construction in the San Diego region for all transit projects and is, therefore, the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) The Commission is a trustee agency for projects that could directly or indirectly affect State sovereign land and their accompanying Public Trust resources or uses. Additionally, because the Project involves work on State sovereign land, the Commission will act as a responsible agency. Commission staff requests that SANDAG consult with us on preparation of the Draft EIR as required by CEQA section 21153, subdivision (a) and the State CEQA Guidelines section 15086, subdivisions (a)(1) and (a)(2).

Commission Jurisdiction and Public Trust Lands

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways.

The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine.

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the state for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line (MHTL), except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court.

Any Project activities or improvements located on State sovereign land will require Commission review and authorization in the form of a lease. Final determination regarding the Commission's jurisdiction in the location of any specific Project activities or improvements will require a review of more detailed Project site plans. Such review can be facilitated via submittal of an Inquiry to the Commission, or via the lease application submittal process. Both Inquiries and lease applications can be submitted through the Commission's online system for Customer Applications and Records (OSCAR | Online System for Customer Applications and Records ·OSCAR Portal).

Based on the information provided in the subject NOP, the proposed Project alternative alignments include components such as the potential placement of beach-quality sand excavated from tunnel boring or trench excavation activities onto beach(es) or nearshore in the vicinity of the study area, the removal of prior bluff stabilization improvements consistent with the California Coastal Commission's certification of Federal Consistency Certifications, and the construction of new bluff stabilization elements for the non-tunnel alignment included in the updated NOP. These activities are highly likely to involve State sovereign land and will require a lease from the Commission if said activities encroach waterward of the current MHTL. A MHTL survey from no more than six months prior to the submission of any application or Inquiry for these activities will be required and will need to be submitted along with any Inquiry or application in order for staff to properly review the Commission's jurisdiction.

Additionally, staff's review of the NOP indicates that the Project Alternatives would involve construction activities and improvements on lands within San Dieguito Lagoon, Los Peñasquitos Lagoon, and adjacent to the Del Mar Bluffs. These areas are likely to include sovereign lands within the Commission's

jurisdiction, and any activities or improvements in these areas that are situated on State sovereign lands would require a lease from the Commission. In order to definitively determine if Project activities in San Dieguito Lagoon, Los Peñasquitos Lagoon, or adjacent to the Del Mar Bluffs fall within the Commission's jurisdiction more detailed Project plans would be required.

Project Description

SANDAG proposes to potentially relocate the existing single-track alignment of the San Diego Subdivision from a rail line running along a terrace on coastal bluffs through the Cities of Solana Beach, Del Mar, and San Diego to a double-track alignment between the Solana Beach Station and the north end of Sorrento Valley in the City of San Diego. The Updated NOP for the Project includes a non-tunnel alignment, referred to as the "Del Mar Bluffs Double-Track Reinforced Alignment." SANDAG included several edited and one additional objective and need in the Updated NOP which now include:

- Improve rail service reliability by minimizing risks from climate change, including considerations for sea level rise, flooding, and the stability of coastal bluffs.
- Minimize impacts to existing homes, businesses, tourism, and major economic generators, including the Del Mar Fairgrounds, and transportation facilities, during and after construction.
- Demonstrate good public stewardship by delivering the project in a timely way that considers prior investments, construction, right-of-way, operations, and maintenance costs.

From the Project Description included in the updated NOP, Commission staff understands that the "Del Mar Bluffs Double-Track Reinforced Alignment" includes the following components which have the potential to impact State sovereign land.

- Trenches and Retaining Walls: The Del Mar bluffs would be trenched to install the rail line, and the trench would be stabilized with retaining walls.
- Bluff Stabilization Elements: New and expanded seawalls would be installed to stabilize the trenched bluffs on the western side adjacent to the beach. Slope stabilization would include 1.5 miles of sea walls up to approximately 20 feet in height.
- Construction and/or retrofit of existing bridge structures: Construction and/or retrofit of existing bridges would be required where the non-tunnel alignment does not deviate from the existing alignment to allow for the construction of the double track.

- Sand Placement: Potential placement of beach-quality sand excavated from trenching activities onto beach(es) or nearshore, in the vicinity of the Project area.
- Berm Raising and Widening: The alignment would require the raising and widening of a berm in Los Peñasquitos Lagoon to accommodate the double track and account for flooding and projected sea level rise.

Environmental Review

Commission staff have focused comments specifically on changes to the Project alignments identified in the Updated NOP that have potential to impact Commission jurisdictional land and the Public Trust. Commission staff requests that SANDAG consider these new comments when preparing the Draft EIR (DEIR), in addition to previously submitted comments (Attachment 1: July 19, 2024, CSLC NOP Comment Letter to SANDAG) to ensure that impacts to State sovereign land are adequately analyzed for the Commission's use of the EIR to support consideration of a future lease for the Project.

General Comments

1. Project Description: A thorough and complete Project Description should be included in the DEIR for all proposed rail alignments in order to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives. The Project Description should be as precise as possible in describing the details of all Project activities (e.g., types of equipment or methods that may be used, maximum area of impact or volume of sediment removed or disturbed, seasonal work windows, locations for beach sand placement, etc.), as well as the details of the timing and length of activities. In particular, please illustrate on figures and engineering plans and provide written description in the DEIR of activities occurring within and adjacent to Project area waterways. These figures should include temporary construction easements and anchoring locations which may be required for marine equipment or vessels used for bluff trenching, bluff stabilization improvements, existing bridge construction and/or retrofits, and berm widening and raising through Project area lagoons. Thorough descriptions will facilitate Commission staff's determination of the extent and locations of its leasing jurisdiction, make for a more robust analysis of the work that may be performed, and minimize the potential for subsequent environmental analysis to be required.

Biological Resources

2. Special status species and habitat: The construction of additional bluff stabilization structures over 1.5 miles of coastline between Del Mar and Torrey Pines Road has the potential to create long-term impacts to beach and nearshore coastal habitats. Staff recommend that SANDAG reach out to the California Department of Fish and Wildlife (CDFW), the United States Fish and Wildlife Service (USFWS), and the National Marine Fisheries Service (NMFS) as early as possible in the consultation process with the addition of the Del Mar Bluffs Double-Track Reinforced Alignment considering these potential impacts.

   For land under the Commission's jurisdiction, the DEIR should disclose and analyze all potentially significant effects on sensitive species and habitats in and around the Project area, including special status wildlife, fish, and plants, and if appropriate, identify feasible mitigation measures to reduce those impacts. SANDAG should conduct queries of CDFW's California Natural Diversity Database and USFWS's Special Status Species Database to identify any special status plant or wildlife species that may occur in the Project area. The DEIR should also include a discussion of consultation with CDFW, USFWS, and NMFS, as applicable, including any recommended mitigation measures and potentially required permits identified by these agencies.

   Commission staff do appreciate changes SANDAG made to the San Dieguito to I-5 Alternative Alignment in the Updated NOP to better avoid San Dieguito Lagoon and active lagoon restoration projects.

Climate Change

3. Sea Level Rise and Coastal Resilience: A tremendous amount of State-owned lands and resources under the Commission's jurisdiction will be impacted by rising sea levels. The impacts will be exacerbated by coastal development that impedes the inland migration of the shoreline, a process known as "coastal squeeze," leading to the inundation of public beaches and other tidelands that are State-owned land and subject to the protections of the Public Trust Doctrine. The DEIR must consider the effects that expanding bluff stabilization structures will have on public beaches by exacerbating coastal squeeze at the project location and potentially contributing to a reduction of sediment supply to downcoast beaches.

   As stated in SANDAG's 'Post Value Analysis Study Assessment,' the new alternative would be "less climate resilient than other alternative concepts; would require routine beach replenishment if the beach is to be preserved and could require ongoing or emergency bluff stabilization maintenance."

The DEIR must thoroughly assess the long-term vulnerability of this alternative, which would not only continue to expose the existing critical infrastructure to coastal hazards, wave impacts, beach and bluff erosion, and long-term sea level rise, but also expand the critical infrastructure into a known hazard zone. The expansion of bluff stabilization could be vulnerable to scour and structural damage, potentially requiring frequent and costly repairs over time. By doubling down on infrastructure in a hazard zone, this alternative could lock in ongoing maintenance obligations, require additional armoring, and increase the cost for future adaptation if this alternative is not adequately resilient. The DEIR should evaluate the cumulative impacts and lifecycle of maintaining and defending this alignment, and compare them to the other alternatives. According to the Ocean Protection Council's 2024 Sea Level Rise Guidance, critical infrastructure, such as the LOSSAN Rail, should be considered extremely risk-averse and resilient to the High Sea Level Scenario.

Recreation

4. Public Access: The expansion of bluff stabilization structures for the Del Mar Bluffs Double-Track Reinforced Alignment has the potential to result in both temporary impacts to the beach and beach access during construction and long-term, permanent impacts due to sand loss and coastal squeeze from hard armoring structures like sea walls. The DEIR must evaluate the impacts to public access and use of the public beach at the project location due to the effects of the bluff stabilization structures on coastal processes, coastal squeeze, and sea level rise. These effects should be compared to all other alternatives, including where the existing bluff stabilization structures would be removed, allowing the bluff to naturally erode, thereby providing sediment downcoast and creating more space for the beach to migrate inland. The DEIR should also consider how the bluff stabilization structures could impede lateral access to up- and down-coast beaches, not only affecting the public's ability to use the beach at the project location but also adjacent beaches. In addition to impacts to access, the DEIR should also evaluate the impacts on various recreational activities. Not only can coastal squeeze prevent recreation activities that require a dry sandy beach (e.g., sunbathing), but waves hitting and reflecting off hard armoring structures can create unsafe conditions for swimming, surfing, beach walks, and other public uses of Public Trust tidelands.

Thank you for the opportunity to comment on the Updated NOP for the Project. As a trustee and responsible agency, Commission staff requests consultation on this Project and to be kept advised of changes to the Project Description and all other important developments. Please send additional information on the Project to the Commission staff listed below as the EIR is being prepared.

Please refer questions concerning environmental review to Robin Tuohy, Environmental Scientist, via email at Robin.Tuohy@slc.ca.gov. For questions concerning Commission leasing jurisdiction, please contact Jeffrey Plovnick, Public Land Management Specialist, via email at Jeffrey.Plovnick@slc.ca.gov.

Sincerely,

Nicole Dobroski, Chief
Division of Environmental Science, Planning, and Management

cc: Office of Planning and Research
R. Tuohy, Commission
M. Wells, Commission
J. Plovnick, Commission

Attachment:

1) July 19, 2024, Notice of Preparation Comment Letter from the Commission staff to the San Diego Association of Governments.

CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

JENNIFER LUCCHESI, *Executive Officer*
916.574.1800
TTY CA Relay Service: **711** *or Phone* **800.735.2922**
from Voice Phone **800.735.2929**
or for Spanish **800.855.3000**

Contact Phone: 916.574.1900

July 19, 2024

File Ref: SCH # 2024060038

SANDAG
Attn: Tim Pesce
401 B Street, Suite 800
San Diego, CA, 92101

*VIA ELECTRONIC MAIL (*LOSSANcorridor@sandag.org*)*

Subject: Notice of Preparation for an Environmental Impact Report for San Diego-Los Angeles-San Diego-San Luis Obispo Rail Realignment Project, San Diego County

Dear Tim Pesce:

The California State Lands Commission (Commission) staff has reviewed the subject Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment Project (Project), which is being prepared by the San Diego Association of Governments (SANDAG). SANDAG has been assigned the responsibility for planning, funding allocation, Project development, and construction in the San Diego region for all transit projects and is, therefore, the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) The Commission is a trustee agency for projects that could directly or indirectly affect State sovereign land and their accompanying Public Trust resources or uses. Additionally, because the Project involves work on State sovereign land, the Commission will act as a responsible agency. Commission staff requests that SANDAG consult with us on preparation of the Draft EIR as required by CEQA section 21153, subdivision (a) and the State CEQA Guidelines section 15086, subdivisions (a)(1) and (a)(2).

Commission Jurisdiction and Public Trust Lands

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and

submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine.

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the State for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line (MHTL), except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court.

Any Project activities or improvements located on State sovereign land will require Commission review and authorization in the form of a lease. Final determination regarding the Commission's jurisdiction in the location of any specific Project activities or improvements will require a review of more detailed Project site plans. Such review can be facilitated via submittal of an Inquiry application to the Commission, or via the lease application submittal process (OSCAR | Online System for Customer Applications and Records ·OSCAR Portal).

Based on the information provided in the subject NOP, the proposed Project includes the potential placement of beach-quality sand excavated from tunnel boring activities either onto beach(es) or nearshore in the vicinity of the study area as well as the removal of prior bluff stabilization improvements consistent with the California Coastal Commission's certification of Federal Consistency Certifications. These activities are likely to involve State sovereign land and will require a lease from the Commission if said activities encroach waterward of the most landward surveyed MHTL. An MHTL survey from no more than six months prior to the submission of any application or inquiry for these activities will be required and will need to be submitted along with any inquiry or application in order for staff to properly review the Commission's jurisdiction.

Additionally, staff's review of the NOP indicates that the Project Alternatives would involve construction activities and improvements on State sovereign lands within San Dieguito Lagoon and Los Peñasquitos Lagoon. If under Commission jurisdiction, these activities and improvements would require a lease from the Commission. More detailed Project plans would be required to determine whether Project activities fall within the Commission's jurisdiction in Los Peñasquitos Lagoon.

Project Description

SANDAG proposes to potentially relocate the existing single-track alignment of the San Diego Subdivision from a rail line running along a terrace on coastal bluffs through the Cities of Solana Beach, Del Mar, and San Diego to a double-track alignment between the Solana Beach Station and the north end of Sorrento Valley in the City of San Diego. This Project would meet SANDAG's objectives and needs as follows:

- Improve rail service reliability
- Maintain passenger rail service to the existing train stations serving Solana Beach and Sorrento Valley and accommodate direct rail access to the Del Mar Fairgrounds
- Minimize impacts in the surrounding communities during and after construction.
- Avoid and/or minimize impacts on biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places.
- Help meet the goals of the 2021 Regional Plan and the 2018 California State Rail Plan by increasing passenger and freight train capacity, further reducing travel times, improving reliability, and accommodating additional rail service.
- Improve coastal access and safety by eliminating at-grade railroad crossings and minimizing other pedestrian-rail points of interaction.

From the Project description, Commission staff understands that the Project would include the following components that have the potential to affect State sovereign land:

- Sand Placement: Potential placement of beach-quality sand excavated from tunnel boring activities onto beach(es) or nearshore, in the vicinity of the study area.
- Removal of Bluff Stabilization Improvements: Removal of prior bluff stabilization improvements which could involve staging and/or use of construction equipment on state lands.
- Rail Line Construction: Depending on the Project Alternative that advances as the proposed Project, construction activities and infrastructure components including bored tunnels, cut-and-cover tunnels, bridges, floodwalls, and berms would occur in or affect the San Dieguito and Los Peñasquitos Lagoons.

Environmental Review

Commission staff requests that SANDAG consider the following comments when preparing the Draft EIR (DEIR) to ensure that impacts to State sovereign land are adequately analyzed for the Commission's use of the EIR to support a future lease approval for the Project.

General Comments

1. Project Description: A thorough and complete Project Description should be included in the DEIR in order to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives. The Project Description should be as precise as possible in describing the details of all allowable activities (e.g., types of equipment or methods that may be used, maximum area of impact or volume of sediment removed or disturbed, seasonal work windows, locations for material disposal, etc.), as well as the details of the timing and length of activities. In particular, please illustrate on figures and engineering plans and provide written description in the DEIR of activities occurring within and adjacent to Project area waterways. Thorough descriptions will facilitate Commission staff's determination of the extent and locations of its leasing jurisdiction, make for a more robust analysis of the work that may be performed, and minimize the potential for subsequent environmental analysis to be required.

Biological Resources

2. Special Status Species: For land under the Commission's jurisdiction, the DEIR should disclose and analyze all potentially significant effects on sensitive species and habitats in and around the Project area, including special status wildlife, fish, and plants, and if appropriate, identify feasible mitigation measures to reduce those impacts. SANDAG should conduct queries of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database and U.S. Fish and Wildlife Service's (USFWS) Special Status Species Database to identify any special status plant or wildlife species that may occur in the Project area. The DEIR should also include a discussion of consultation with CDFW, USFWS, and the National Marine Fisheries Service (NMFS), as applicable, including any recommended mitigation measures and potentially required permits identified by these agencies.

   Commission staff notes that Project construction activities could adversely affect the San Dieguito Lagoon Ecological Reserve, under the management of CDFW, and Los Peñasquitos Lagoon, managed by California State Parks and the Los Peñasquitos Lagoon Foundation. The lagoons provide critical habitat and resting areas for migrating waterfowl, nesting sites for sensitive bird species, nursery habitat for young fish, protect a diversity of plant and

animal species, and serve as saltmarsh habitat for a variety of flora and fauna. The San Dieguito Lagoon is also a State Marine Conservation Area. Therefore, SANDAG should also consult and/or coordinate with CDFW and California State Parks regarding potential impacts to the two lagoons

3. Lagoon Restoration Projects: The DEIR should discuss whether or how Project activities could affect current lagoon restoration projects and, if applicable, their related mitigation requirements. San Dieguito Lagoon is the site of various active restoration projects, including the San Dieguito Lagoon Restoration Project Phase II and Southern California Edison's San Dieguito Wetlands Restoration Project, which are tied to mitigation requirements for other projects in accordance with CEQA and a Coastal Development Permit. Los Peñasquitos Lagoon is also the subject of a restoration effort undertaken by the Los Peñasquitos Lagoon Enhancement Plan, a cooperative effort between California State Parks, State Coastal Conservancy, and the Los Peñasquitos Lagoon Foundation.

4. Invasive Species: The DEIR should consider the Project's potential to encourage the establishment or proliferation of aquatic invasive species (AIS), including aquatic plants. One of the major stressors in California waterways is the introduction of invasive species. Project activities, such as the placement of beach sand, have the potential to introduce invasive species if in-water methods of implementation are chosen. Construction boats and barges brought in from long stays at distant projects may transport new species to the Project area via vessel biofouling, wherein marine and aquatic organisms attach to and accumulate on the hull and other wetted surfaces of a vessel.

   If the analysis in the DEIR finds potentially significant AIS impacts, possible mitigation could include contracting local vessels and barges or requiring contractors to inspect and clean the hull and other underwater surfaces of vessels prior to arrival in California. The Commission's Marine Invasive Species Program could assist with this analysis as well as with the development of appropriate mitigation (information at https://www.slc.ca.gov/misp/).

5. Hazardous Materials: The DEIR should explain how the beach-quality sand will be tested to determine if it is "clean" or safe for use and appropriate for the receiving area prior to being placed on the beach or in the near-shore environment. Mitigation measures should include spill contingency plans for vessels or other in-water construction equipment and any construction equipment used on beaches.

6. Water Quality: Construction activities occurring in or over the water could impact water quality through the accidental release of debris or through construction activities that may disturb sediment and increase turbidity. The

DEIR should discuss how the Project will prevent construction debris from entering the water and how any fallen debris would be addressed. The DEIR should also analyze turbidity impacts in the lagoon and Pacific Ocean from Project activities and identify relevant mitigation measures.

7. Construction Noise: The DEIR should also evaluate noise and vibration impacts on fish, birds, and marine mammals, as applicable, from in-water construction activities. Such activities potentially include the construction of floodwalls, boring of tunnels and relocation of beach sand, and the removal of bluff stabilization improvements. Mitigation measures could include, but are not limited to, species-specific work windows as defined by CDFW, USFWS, and NMFS as well as noise attenuation devices. Again, staff recommends early consultation with these agencies to minimize the impacts of the Project on sensitive species.

Climate Change

8. Greenhouse Gas (GHG): A GHG emissions analysis consistent with the California Global Warming Solutions Act (Assembly Bill [AB] 32; Nuñez, Chapter 488, Statutes of 2006) and required by the State CEQA Guidelines should be included in the DEIR. This analysis should identify a threshold for determining significance of GHG emissions, calculate the level of GHGs that will be emitted as a result of construction and ultimate build-out of the Project, and, if impacts are significant, identify mitigation measures that would reduce them to the extent feasible.

9. Sea Level Rise: Governor Brown issued Executive Order B-30-15 in April 2015, which directs State government to fully implement the State's Climate Adaptation Strategy and factor in climate change preparedness in planning and decision making. Senate Bill 1 (Atkins, 2021) requires state and regional agencies to identify and, to the extent feasible, avoid, minimize, and mitigate the impacts of sea level rise. The bill also established specific goals for sea level rise adaptation, including enhancing the coastal environment, maximizing public access and recreational opportunities, and considering Californians' social and economic needs.

   SANDAG should consider discussing in the DEIR if and how various Project components located on State-owned lands might be affected by sea level rise and whether "resilient" designs have been incorporated. A tremendous amount of State-owned lands and resources under the Commission's jurisdiction will be impacted by rising sea levels. The San Dieguito Lagoon and its surroundings are generally in a low-lying, flood-prone area that will be affected by rising sea levels. Additionally, because of their nature and location, these lands and resources are already vulnerable to a range of natural events, such as storms and extreme high tides.

As the Project is designed and evaluated, attention should be given to sea level rise projections to ensure the structures' designs are sufficient to ensure function, safety, and protection of the environment over the expected life of the structure. For bridges, this could include the location and design of the anchors/footings, height of the span, design or use of bank stabilization, etc. The DEIR should also consider how the structures' designs could exacerbate the impacts that sea level rise will have on State-owned lands and resources, such as displacing the limited and vulnerable wetland habitat in San Dieguito Lagoon.

The DEIR should also consider the projections for sea level rise and bluff erosion to evaluate how the removal of bluff stabilization and the "No Project" alternative could either alleviate or contribute to coastal squeeze and affect coastal resources and sediment supplies. The removal of bluff stabilization improvements adjacent to the Pacific Ocean could affect lands in the Commission's jurisdiction. As described in the Commission's Shoreline Adaptation and the Public Trust report, seawalls, riprap, and other forms of hard armoring can have several adverse effects on State-owned lands and resources, such as accelerating beach loss, blocking beach access, degrading scenic quality, and displacing intertidal habitat. As sea levels rise, these effects could become more pronounced as the bluff stabilization improvements stop the inland migration of the shoreline and decrease the sediment supplies that are critical for sustaining the beaches and nearshore ecosystems.

As demonstrated by recent bluff erosion and the need for SANDAG to implement multiple emergency repairs and five bluff stabilization projects, sea level rise and bluff erosion are significant threats to the existing railroad and its ability to operate safely. Since these threats are the impetus for the Project, SANDAG should consider including information in the DEIR that incorporates the current trends and acceleration in sea level rise and bluff erosion. As noted in the NOP, the bluff is eroding 0.4-0.6 feet per year. Therefore, assuming the current location of the shoreline and bluff would remain fixed over the Project lifespan could be misleading for the impact analyses for some resource categories, such as recreation, biological resources, cultural resources, and hazards.

Please note that when considering lease applications, Commission staff will (1) request information from applicants concerning the potential effects of sea level rise on their proposed projects, (2) if applicable, require applicants to indicate how they plan to address sea level rise and what adaptation strategies are planned over the projected life of their Project, and (3) where appropriate, recommend Project modifications that would eliminate or

reduce potentially adverse impacts from sea level rise, including adverse impacts on public access.

Cultural Resources

10. Title to Resources: Infrastructure components (e.g., bridges, berms, floodwalls, and tunnels) identified in Figure 2 could require excavation activities on lands within the Commission's jurisdiction. The DEIR should identify that title to all abandoned archaeological sites and historic or cultural resources on or in the tide and submerged lands of California is vested in the State and under the jurisdiction of the California State Lands Commission (Pub. Resources Code, § 6313). Commission staff requests that SANDAG consult with Commission staff should any such resources on State lands be discovered during construction of the proposed Project. In addition, Commission staff requests that the following statement be included in the EIR's Mitigation and Monitoring Plan: "The final disposition of archaeological, historical, and paleontological resources recovered on State lands under the jurisdiction of the Commission must be approved by the Commission."

Recreation:

11. Public Access: The DEIR should discuss how Project activities may disrupt or otherwise impact public access to State lands. On page 7, the NOP identifies several Project infrastructure components which could potentially impact public access, including the placement of beach quality sand onto beach(es) and the removal and replacement of existing bluff stabilization improvements. Staff encourages SANDAG to consider a Project design and construction timeline which avoids or minimizes disruptions to public access.

Tribal Cultural Resources:

12. Consideration of Tribal Cultural Resources: AB 52 includes both procedural *and* substantive requirements, including the requirement that lead agencies strive to avoid significant adverse changes to tribal cultural resources, regardless of whether consultation is requested or occurs, and incorporate mitigation measures recommended by tribes unless the lead agency determines those suggestions are not feasible. Commission staff encourages SANDAG to go beyond the requirements of AB 52 by conducting outreach and consultation with all tribes culturally affiliated with the Project area, as determined by the Native American Heritage Commission. The Commission strongly encourages early, frequent, and meaningful engagement with all culturally affiliated tribes that may be affected by this Project.

Alternatives

13. Alternatives: In addition to describing mitigation measures that would avoid or reduce the potentially significant impacts of the Project, SANDAG should identify and analyze a range of reasonable alternatives to the proposed Project that would attain most of the Project objectives while avoiding or reducing one or more of the potentially significant impacts (see State CEQA Guidelines, § 15126.6). In addition to a No Project alternative, the DEIR should identify the environmentally superior alternative.

Environmental Justice

14. Environmental justice is defined by California law as "the fair treatment and meaningful involvement of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." (Gov. Code § 65040.12) This definition is consistent with the Public Trust Doctrine's principle that management of trust lands is for the benefit of all people.

    The Commission adopted an updated Environmental Justice Policy and Implementation Blueprint in December 2018 to ensure that environmental justice is an essential consideration in the agency's processes, decisions, and programs. The twelve goals outlined in the Policy reflect an urgent need to address the inequities of the past, so they do not continue. Through its policy, the Commission reaffirms its commitment to an informed and open process in which all people are treated equitably and with dignity, and in which its decisions are tempered by environmental justice considerations.

    Although not legally required in a CEQA document, Commission staff suggests that SANDAG include a section describing the environmental justice community outreach, engagement undertaken in developing the DEIR, and the results of such outreach. Environmental justice communities often lack access to the decision-making process and experience barriers to becoming involved in that process. It is crucial that these communities are consulted as early as possible in the Project planning process.

    The California Office of Environmental Health Hazard Assessment developed the CalEnviroScreen mapping tool to assist agencies with locating census tracts near proposed projects and identifying the environmental burdens, should there be any, that disproportionately impact those communities. Commission staff strongly recommends using the CalEnviroScreen tool and then, as applicable, reaching out through local community organizations, such as the California Environmental Justice Alliance. Engaging in early outreach will facilitate more equitable access for all community members. In

this manner, the CEQA public comment process can improve and provide an opportunity for more members of the public to provide input related to environmental justice.

Commission staff also recommends incorporating or addressing opportunities for community engagement in mitigation measures. Commission staff will review the environmental justice outreach and associated results as part of any future Commission action.

Thank you for the opportunity to comment on the NOP for the Project. As a trustee and responsible agency, Commission staff requests consultation on this Project and to be kept advised of changes to the Project Description and all other important developments. Please send additional information on the Project to the Commission staff listed below as the DEIR is being prepared.

Please refer questions concerning environmental review to Robin Tuohy, Environmental Scientist, via email at Robin.Tuohy@slc.ca.gov. For questions concerning Commission leasing jurisdiction, please contact Jeffrey Plovnick, Land Management Specialist III, via email at Jeffrey.Plovnick@slc.ca.gov.

Sincerely,

Nicole Dobroski, Chief
Division of Environmental Science,
Planning, and Management

cc: Office of Planning and Research
R. Tuohy, Commission
J. Plovnick, Commission

Attachments: image001.png
image002.png
image003.png
image004.png
06.30.2025 SANDAG LOSSAN Project NOP_Final Comment Letter.pdf

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From: Davis, Alex <Alex.Davis@sen.ca.gov>
Sent: Monday, June 30, 2025 9:30:38 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: San Diego LOSSAN Rail Realignment Project - Comments

On behalf of State Senator Catherine Blakespear, please see the attached comments regarding the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the San Diego LOSSAN Rail Realignment project.

Sincerely,
Alex Davis

Alex Davis
Principal Consultant
Senator Catherine Blakespear | 38th District
(949) 598-5850

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SENATOR.BLAKESPEAR@SENATE.CA.GOV
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California State Senate

SENATOR CATHERINE BLAKESPEAR

THIRTY-EIGHTH SENATE DISTRICT

STANDING COMMITTEES
ENVIRONMENTAL QUALITY
CHAIR
BUDGET AND FISCAL REVIEW
GOVERNMENTAL ORGANIZATION
TRANSPORTATION

SUBCOMMITTEES
BUDGET SUBCOMMITTEE #2:
RESOURCES, ENVIRONMENTAL PROTECTION AND ENERGY
LOSSAN RAIL CORRIDOR RESILIENCY
CHAIR

JOINT COMMITTEES
CLIMATE CHANGE POLICIES

June 30, 2025

San Diego Association of Governments (SANDAG)
Attn: LOSSAN Comments
1011 Union Street, Ste 400
San Diego, CA 92101
Email: lossancomments@sandag.org
VIA EMAIL ONLY

Re: Comments Regarding the Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the San Diego LOSSAN Rail Realignment Project Released May 16, 2025

To Whom It May Concern:

Thank you for the opportunity to comment on the Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the San Diego LOSSAN Rail Realignment Project. The preparation of a DEIR is an important step in identifying a long-term solution for the Los Angeles – San Diego – San Luis Obispo (LOSSAN) rail corridor currently operating on fragile coastal bluffs. This sensitive operating environment requires responsible stakeholders to work collaboratively and with a sense of urgency toward a solution. Without action, natural resources and public infrastructure are at risk as coastal hazards become increasingly severe and frequent. I fully support the completion of appropriate environmental documents needed to identify a safe alternative route for the railroad.

This proposed project is needed to ensure the safety and continued operation of rail services. Failure to act will result in additional emergency projects and the continued reliance on short-term stabilization efforts. This rail line provides an important public service that is integral to our local, regional, state and national public interests and therefore it's crucial that we protect it.

As Chair of the Senate Transportation Subcommittee on LOSSAN Rail Corridor Resiliency, I am well aware of the challenges the line faces – and the difficulties and complexities to address them. We have a delicate balancing act to maintain and reinforce rail infrastructure while at the same time protecting and respecting the coast's precious environmental resources. But just because it's difficult, and requires tough choices, doesn't mean we shouldn't act, and act with urgency. This important environmental document process exists to bring all interested stakeholders together, collect all the relevant information and reach a solution that's in the public's best interest.

As noted in my letter of July 19, 2024, I recognize that there are many passionate and different opinions about this project. I encourage us all to remember the importance of strategic and bold action. We have a process before us that will inform the public and decision makers about the best available data, science and engineering standards. We should trust the process and its result. We must act before we face potentially more serious consequences of inaction.

Sincerely,

SENATOR CATHERINE BLAKESPEAR

SENATE DISTRICT 38

Cc: Hon. Mike Levin, United States Representative, 49th District
Hon. Bob Archuleta, State Senator, 30th District
Hon. Sabrina Cervantes, State Senator, 31st District
Hon. Monique Limón, State Senator, 19th District
Hon. Tony Strickland, State Senator, 36th District
Hon. Thomas Umberg, State Senator, 34th District
Hon. Tasha Boerner, State Assemblymember, 77th District
Hon. Terry Gaasterland, Mayor, City of Del Mar
Hon. Todd Gloria, Mayor, City of San Diego
Carlene Moore, CEO, 22nd District Agricultural Association

Attachments: 20250630_2024-0087158-CEQA-2-SD_San Diego LOSSAN Rail Realignment Updated NOP comments.pdf

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From: Garn, John C <john_garn@fws.gov>
Sent: Monday, June 30, 2025 7:39:01 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>; Tim Pesce <timothy.pesce@sandag.org>
Cc: Zoutendyk, David <David_Zoutendyk@fws.gov>; Kershek, Lauren <lauren_kershek@fws.gov>; Tumaliuan, Ihyns S <ihyns_tumaliuan@fws.gov>
Subject: Comments on the Updated Notice of Preparation of a Draft Environmental Impact Report for the San Diego LOSSAN Rail Realignment Project, San Diego County, California

Good afternoon,

I hope this finds you healthy.

Please see attached.

Please note - some Firewall or email security settings will strip the digital signature from the letter. Please review the attachment and if the digital signature is not intact, contact me for an alternate method of transmittal through the secure FWS fileshare program.

A hard copy letter will not follow.

Sincerely,
John

John Garn
Administrative Assistant
U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office

Palm Springs Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
760.431.9440

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008

In Reply Refer to:
2024-0087158-CEQA-2-SD

June 30, 2025
Sent Electronically

Tim Pesce
Senior Environmental Planner
San Diego Association of Governments
1011 Union Street, Suite 400
San Diego, California 92101

Attention: LOSSAN Comments

Subject: Comments on the Updated Notice of Preparation of a Draft Environmental Impact Report for the San Diego LOSSAN Rail Realignment Project, San Diego County, California

Dear Tim Pesce:

The U.S. Fish and Wildlife Service (Service) has reviewed the San Diego Association of Governments' (SANDAG) Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR), dated May 16, 2025, for the San Diego Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (project), San Diego County, California (SANDAG 2025). The comments provided in this letter are based on information provided in the NOP, previous coordination meetings with SANDAG, our previous comment letter on an NOP for the project, dated July 18, 2024 (2024-0087158-CEQA-SD), and our knowledge of sensitive and declining species and habitats.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(l) of the Act.

PROJECT DESCRIPTION

The project is located between the City of Solana Beach and Sorrento Valley in the City of San Diego and proposes to relocate the existing single-track railroad alignment from coastal bluffs in the City of Del Mar to a more eastern double-track alignment that would be located primarily within tunnels (Figure 1). The new alignment may also include aerial structures, U-structures, floodwalls, and berms. The objectives of the project include minimizing reliability risks caused

by coastal bluff erosion, providing greater passenger and freight train capacity, minimizing at-grade crossings, minimize conflicts with pedestrians, and minimizing impacts to biological and recreational resources. The project would also include removal of existing railroad infrastructure and stabilization features where the existing alignment would no longer be in service following realignment.

The Draft EIR will include analysis of a No Project alternative and three project alternatives (Figure 1). Each project alternative would require a north and south portal, a tunnel connecting the portals, and double tracking of the rail line. The project alternatives anticipated to be evaluated in the Draft EIR include the following:

San Dieguito Bridge to Interstate 5 (I-5) Alternative Alignment:

This alternative (Figure 2) has two design options that will be evaluated at the northern extent. One variation would transition from the south end of the future San Dieguito Double Track bridge and the other would transition from the south end of the future Special Events Platform at the 22nd District Agricultural Association (Del Mar Fairgrounds). Both options would curve to the east toward the intersection of Jimmy Durante Boulevard and San Dieguito Drive. From there, the alignment would bridge across the south side of San Dieguito Lagoon and enter at the "Racetrack View Drive Portal" within the northern portion of Crest Canyon Open Space Park. The tunnel would continue southeast and turn south to follow under I-5, then exit at the "Knoll near I-5 South Portal," which is located south of Carmel Valley Road on area of elevated open space just west of I-5. The alignment would then transition back into the existing railroad alignment within the back end of Los Peñasquitos Lagoon through a cut-and-cover tunnel and U-Section.

Under Crest Canyon Alternative Alignment:

This alternative (Figure 3) would descend immediately south of the future San Dieguito Double Track bridge and enter a tunnel at the "Under Jimmy Durante Boulevard North Portal." The alignment would continue in a tunnel southeast generally under Crest Canyon and exit at the Knoll Near I-5 South Portal. The alignment would then transition back into the existing railroad alignment within the back end of Los Peñasquitos Lagoon through a cut-and-cover tunnel and U-Section.

Under Camino Del Mar Alternative Alignment:

This alternative (Figure 4) would descend at the Under Jimmy Durante Boulevard North Portal, then continue in a tunnel south, mostly under Camino Del Mar, and exit at the "Torrey Pines Road West Portal," located near the intersection of Carmel Valley Road and North Torrey Pines Road. The alignment would then continue south on a bridge and transition into the existing railroad berm, which would be double tracked, raised, and widened through the central and eastern portions of Los Peñasquitos Lagoon.

Del Mar Bluffs Double Track Reinforced Alternative Alignment

This is a non-tunnel alignment (Figure 5) that would include adding a second track to the existing alignment on the Del Mar Bluffs. The alternative would begin south of the Camino Del Mar bridge and descend into a trench along the existing alignment. The trenched alignment would cross under Coast Boulevard, removing the existing at-grade crossing, and Coast Boulevard would be raised to accommodate the railroad grade separation. As the alignment travels south, it would ascend to grade to meet with the existing tracks along the southern portion of the Del Mar Bluffs using retaining walls along the eastern boundary. On the western side, adjacent to the beach, the slope would be stabilized with 1.5 miles of seawalls up to about 20 feet high. The alternative would likely make modifications to the North Torrey Pines Road Overhead Bridge at the southern end of the bluffs to accommodate the additional track. The alternative would bridge south through the northwestern portion of Los Peñasquitos Lagoon and transition back into the existing railroad berm within the central portion of Los Peñasquitos Lagoon, where the berm would be widened and raised until it meets the existing double track north of Sorrento Valley Station. Due to the trenching included in the northern portion of this alignment, potential sand placement on nearby beaches or near shore may also be proposed as part of this alternative.

No Project Alternative

In addition to the Project Alternatives above, the Draft EIR will also include a No Project Alternative that would consist of maintaining the existing single-track alignment along the Del Mar Bluffs. This alternative would require the continued use and possible expansion of major stabilization infrastructure to protect the tracks from coastal erosion.

GENERAL COMMENTS

We offer the comments below on the Updated NOP to assist SANDAG in avoiding and minimizing the project's potential impacts to sensitive resources. Please note that several of these comments were also included in our July 18, 2024, letter regarding the previous NOP for the project.

1. San Dieguito and Los Peñasquitos Lagoon are both occupied by important populations of the federally endangered light-footed Ridgway's (=clapper) rail [*Rallus obsoletus* (=*longirostris*) *levipes*; Ridgway's rail]. Preliminary results from a population genetics study indicate that the North San Diego populations of the Ridgway's rail (including San Dieguito and Los Peñasquitos Lagoon) support the highest genetic diversity throughout the species range (Vandergast *et al*. 2025). Therefore, it is critical that the project avoids impacts to occupied habitat to the maximum extent possible to maintain genetic diversity and connectivity between the North San Diego and South San Diego populations.

   The San Dieguito Bridge to I-5 Alternative Alignment and Under Crest Canyon Alternative Alignment are preferrable for reducing hydrologic impacts to Los Peñasquitos Lagoon overall; however, the proposed alignment south of the "Knoll Near I-5 South Portal" would pass through brackish marsh habitat that is occupied by several pairs of

Ridgway's rail. We highly recommend that the Draft EIR evaluate an alternative portal location that is located further to the south to reduce potential impacts to occupied Ridgway's rail habitat.

2. The Draft EIR should evaluate potential impacts to the Ridgway's rail where the alignment would occur in or adjacent to occupied habitat, including potential noise, vibration, and visual disturbance associated with moving the railroad alignment closer to the Ridgway's rail population in Los Peñasquitos Lagoon (San Dieguito Bridge to I-5 Alternative Alignment and Under Crest Canyon Alternative Alignment). The Draft EIR should also evaluate the potential impacts associated with double tracking the alignment, which will facilitate an increase in daily train trips through Los Peñasquitos Lagoon and occupied Ridgway's rail habitat. The Draft EIR should include proposed measures to reduce noise and vibration disturbance where the tracks would be located adjacent to sensitive habitat, such as permanent sound barriers and vibration reduction designs.

3. The Under Camino Del Mar Alternative Alignment and Del Mar Bluffs Double Track Reinforced Alternative Alignment would result in significant impacts to coastal sage scrub and wetland habitats. The Torrey Pines Road West Portal would impact occupied habitat for the federally threatened coastal California gnatcatcher (*Polioptila californica californica*; gnatcatcher) as part of the Under Camino Del Mar Alternative Alignment. Both alignments would require the addition of a second track along the existing alignment in Los Peñasquitos Lagoon. The existing railroad berm and bridges that are situated through the lagoon have severely altered the natural hydrology by limiting the tidal regime and restricting freshwater flows from Los Peñasquitos Creek to the ocean. We highly recommend prioritizing removal of the existing railroad infrastructure from Los Peñasquitos Lagoon as part of the project to allow for restoration of the lagoon to a more natural tidal system. We also recommend that SANDAG closely coordinate with Los Peñasquitos Lagoon stakeholders to facilitate the appropriate design and implementation of a lagoon enhancement plan as part of the project, including removal of the existing railroad infrastructure from the lagoon. This may create additional Ridgway's rail habitat in the western and central portions of the lagoon to expand this important population and offset any impacts to occupied habitat in the eastern side of the lagoon.

4. The Del Mar Bluffs Double Track Reinforced Alternative Alignment and the No Project Alternative would require extensive use of bluff stabilization infrastructure, such as seawalls. Seawalls can cause increased erosion and scour of coastal habitats adjacent to and down shore of the seawall as a result of reflected wave action (Schoonees *et al*. 2019). Increased scour of the beach at the Del Mar Bluffs and adjacent areas could result in significant changes to local sand transport, potentially changing sand deposition at down shore beaches and within the inlet of Los Peñasquitos Lagoon. In addition, the Del Mar Bluffs Double Track Reinforced Alternative Alignment may include disposal of beach quality sand at local beaches or nearshore in areas that may support foraging or nesting of the federally endangered

California least tern [*Sternula antillarum browni* (*Sterna a. b.*); least tern] and threatened western snowy plover {Pacific Coast distinct population segment [*Anarhynchus nivosus nivosus* (*Charadrius nivosus n.*); plover]}. We recommend that the Draft EIR include an analysis of the potential impacts to these species and coastal habitats as a result of sand placement activities or bluff stabilization infrastructure.

5. The San Dieguito Bridge to I-5 Alternative Alignment and Under Crest Canyon Alternative Alignment include tunnel construction beneath the riparian habitat at the northeast end of Los Peñasquitos Lagoon. The Draft EIR should provide an analysis of potential impacts to groundwater and wetland habitats that may occur as a result of the tunneling process, and measures that will be taken to avoid or minimize those impacts. Baseline hydrologic data should be established, including mapping wetland and riparian vegetation, measuring the normal hydroperiod ranges (durations of inundation), and flow rates. SANDAG should establish a groundwater monitoring and contingency plan that would be implemented during construction, as well as a post-construction monitoring and contingency plan to monitor water levels and maintain the baseline groundwater and surface water levels in wetland habitats.

6. The San Dieguito Bridge to I-5 Alternative Alignment includes a new alignment along the south side of San Dieguito Lagoon. Gnatcatchers are known to occur where the Racetrack View Drive Portal is proposed in the habitat at the north end off Crest Canyon and along the south shore of San Dieguito Lagoon. San Dieguito Lagoon also supports two nest sites for the least tern west of I-5 and east of Jimmy Durante Boulevard. Nesting Ridgway's rails have also been detected in salt marsh habitat just west of Jimmy Durante Boulevard to the north of the proposed alignment (AECOM 2023). We recommend that the Draft EIR address any potential impacts to native habitat occupied by the gnatcatcher, and any potential increase in perches for raptors and other avian predators, which may prey on gnatcatchers, Ridgway's rails, and least tern adults and chicks. We also recommend including an analysis of the project's potential increases in noise and visual disturbance to sensitive wildlife in San Dieguito Lagoon as a result of adding a new railroad alignment adjacent to relatively quiet open space.

7. San Dieguito and Los Peñasquitos Lagoon support important wildlife habitat and movement corridors. We recommend that the Draft EIR include an analysis of how the project will maintain wildlife movement corridors through work areas throughout the construction period. We recommend that the Draft EIR evaluate incorporation of bridges wherever the alignment will cross wetlands to minimize impacts to wetland hydrology and wildlife connectivity. We recommend incorporating wildlife crossings at appropriate locations to allow for wildlife movement across the railroad alignment where bridges are not feasible.

8. We recommend that the Draft EIR include minimization measures that require construction adjacent to sensitive habitats to occur outside the avian nesting season (February 15 to September 15) to the maximum extent feasible. If avoiding construction

during the nesting season is not practicable, SANDAG should consider phased construction that would implement the most disruptive activities (e.g. pile driving) outside the nesting season. Minimization measures to reduce noise and vibration when construction must occur within or adjacent to sensitive habitats should be included in the Draft EIR.

9. Each Project alternative includes new impacts outside of the existing railroad right-of-way (ROW) and within the Multi-Habitat Planning Area (MHPA) of the City of San Diego's Multiple Species Conservation Program Subarea Plan. Any impacts to the MHPA should be offset with appropriate mitigation for habitat impacts and commensurate additions to the MHPA that provide equivalent benefits to sensitive resources within the City of San Diego.

10. We recommend that the Draft EIR include a minimization measure that requires all work adjacent to sensitive habitats occur only during daylight hours.

We appreciate the opportunity to comment on the Updated NOP. If you have any questions regarding this letter, please contact Lauren Kershek.[1]

Sincerely,

for Jonathan Snyder
Acting Field Supervisor
U.S. Fish and Wildlife Service

[1] Lauren_Kershek@fws.gov.

LITERATURE CITED

AECOM. 2023. 2023 Light-footed Ridgway's Rail, Coastal California Gnatcatcher, Least Bell's Vireo, and Southwestern Willow Flycatcher Summary Report for the SANDAG San Dieguito to Sorrento Valley Double Track Project, San Diego County, California. October 4.

[SANDAG] San Diego Association of Governments. 2025. Updated Notice of Preparation of a Draft Environmental Impact Report. May 16.

Schoonees, T., A. Gijón Mancheño, T.J. Bouma, R. Silva, T. Schlurmann, and H. Schüttrumpf. 2019. Hard Structures for Coastal Protection, Towards Greener Designs. Estuaries and Coasts 42:1709-1729.

Vandergast, A.G., J.G. Smith, A. Mitelberg, D.A. Wood, K.A. Sawyer, and C.J. Conway. 2025. Genetic structure and diversity in wild populations of the Light-footed Ridgway's Rail reflect 20 years of augmentation through captive breeding and release: U.S. Geological Survey Open-File Report 2025–1011, 24 p., https://doi.org/ 10.3133/ ofr20251011.

Figure 1. Regional location of the Project alternatives and the existing railroad alignment (SANDAG 2025).

Figure 2. San Dieguito to I-5 Alternative Alignment and design located between San Dieguito and Sorrento Valley (SANDAG 2025).

Figure 3. Under Crest Canyon Alternative Alignment and design located between San Dieguito Lagoon and Sorrento Valley (SANDAG 2025).

Figure 4. Under Camino Del Mar Alternative Alignment and design located east of the existing alignment (SANDAG 2025).

Figure 5. Del Mar Bluffs Double Track Reinforced Alternative Alignment and design located along the existing alignment (SANDAG 2025).

Comments from Organizations and Businesses

Attachments: image001.png

From: Catherine G. Burke <cburke@usc.edu>
Sent: Sunday, June 29, 2025 3:05:51 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Mario Orso <mario.orso@sandag.org>
Subject: Candiddats for improvement of LOSSAN Corridor. Letter and proposal -- resending due to indication of a problem on first message

California Infrastructure Institute
13482 Caminito Carmel
Del Mar, CA 92014
(619) 846-1243

June 27, 2025

SANDAG
Attn: LOSSAN Comments
1011 Union Street, Suite 400
San Diego, CA 92101

CANDIDATE SOLUTIONS FOR THE LOSSAN CORRIDOR

The purpose of the California Infrastructure Institute (CALII), a non-profit organization, is to develop options to improve public transportation. We encourage the use of new technologies, where we believe they can contribute to the improvement of transportation systems. Here CALII is submitting a proposal responding to the LOSSAN request for comments that recommends a way to secure

LOSSAN's future using existing train technology.

Whatever the technology, there is still a problem if we only consider improving the corridor by making changes on land. All the ideas regarding new systems on land have potential, but there are good reasons for continuing with a train system despite the opposition of people who do not want tunnels created under their cities. The problem may be our focus on land solutions. That problem could potentially be solved if we put a tunnel below the ocean floor close to the coast. We suggest three options to put the tunnels on the beaches, on rail rights-of-ways, or under the ocean floor using existing technologies as demonstrated by the Chunnel train between Paris and London.

These options will only disrupt people when they are under construction. If the soil is right (geologists must determine this), they may be quicker and cheaper to build because there is no need to battle municipal and citizen lawsuits to block the tunnel "in my town." The methods of building tunnels under the ocean floor are well proven through the research and experiences building the French/English channel tunnel.

We present this for your consideration as another

candidate which could allow earlier construction, that continues to make the train systems viable, and it is less likely to arouse public ire or opposition.

We thank you for your time and attention,

CALIFORNIA INFRASTRUCTURE INSTITUTE

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CC Mario.Orso, SANDAG CEO

California Infrastructure Institute
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SANDAG
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San Diego, CA 92101

CANDIDATE SOLUTIONS FOR THE LOSSAN CORRIDOR

Something must be done to keep the LOSSAN Corridor operational as the cliffs are falling from time to time, interfering with train operations.

The proposals we are aware of are all seeking a way to take the rail system inland tunneling under an existing coastal city to reach the 5 freeway right-of-way. There are other land-based proposals, but the existing rail proposals seem to be the most practical as it will allow continued use of existing train systems. That proposal is estimated to cost $4 billion. There is also opposition in the communities that will have to remove some houses to mitigate the noise and vibrations of a train. Based on experiences with underground tunneling in populated areas there are usually unexpected barriers, and the cost increases.

We believe the real problem is that the rail line along the coast is not viable for the long term because of the cliffs coming down and public objections to having trains going under their cities. Despite all our ideas regarding new systems on land, there are good reasons for continuing with a train system. The existing proposals assume the various systems are staying on land in tunnels. The problem may be our focus on land solutions. The problem may be solved if we put a tunnel under beaches or under existing rail right-of ways, or under the ocean floor close to the coast,.

Potential Solutions

1. **Tunnel under the soil/sand on the beaches which are CA state property.**
   No houses are directly affected. Less likely to have owner lawsuits.
   Beaches are affected only during construction.
   We estimate this option will be the least costly.

2. **Tunnel under the current rail right-of-way.,**
   No beaches affected.

May help to shore up cliffs and provide a solid foundation for rails with fewer harmonics.

Feasibility may be affected by the cliffs, as with the current problem.

We estimate this to be the 2nd most costly

3. **Tunnel built under the ocean floor, off the coast but close to it.**

No beaches affected except, perhaps while under construction. Technology is well understood/feasible. Costs are more likely to be understood and accurate. No surprises in the soil under the water except perhaps sewer pipes which should not be difficult to move.

We estimate this is likely the most costly of the three proposals, but it is also likely to be the most acceptable to the public.

All three of these possibilities, however, are likely to be less costly and quicker to get acceptance than current proposals to tunnel under Del Mar or other cities to the 5 Freeway with all the underground issues, community lawsuits and resulting delays..

We are aware that it will be necessary for geologists to check the soil for viability to determine if each, or any, of these proposals are feasible. Engineering studies will also be necessary, but this has been done in much more difficult situations and the systems are operational and well used.

For example, the French and English built a tunnel under the English Channel (Chunnel Train) which works very well and is popular with passengers. Information is available from that experience with longer, deeper situations that had to be carefully studied. Their success indicates what we are proposing is feasible, practical and more than likely cost effective. From the Chunnel experience, technology and approximate costs are known from building a much more difficult and longer system underwater (see date on attached page).

What we are proposing for California involves three different possibilities each of which might be used in different parts of the system, or the choice might be to select one as the best overall. We could propose one long tunnel from Del Mar up to San Clemente, and depending on cost, we could also recommend two tunnels around the two places where there are existing cliff collapse issues, if that is more cost effective. There might also be areas where there are likely to be problems in the future, which could be added in using one of these approaches.

We've attached a page with some information on building the Chunnel because this is likely to be the least familiar approach, keeping in mind the difficulty and need to develop new knowledge when that was built. That is now available to us.

CALIFORNIA INFRASTRUCTUE INSTITUTE

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Chief Operaring Officer
Newberry Electric
Los Angeles, CA
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(310) 245-1350

CC: Mario Orso, SANDAG CEO

Chunnel Construction Data

Vital Statistics:
Location: Folkestone, England, and Sangatte, France
Completion Date: 1994
Cost: $21 billion

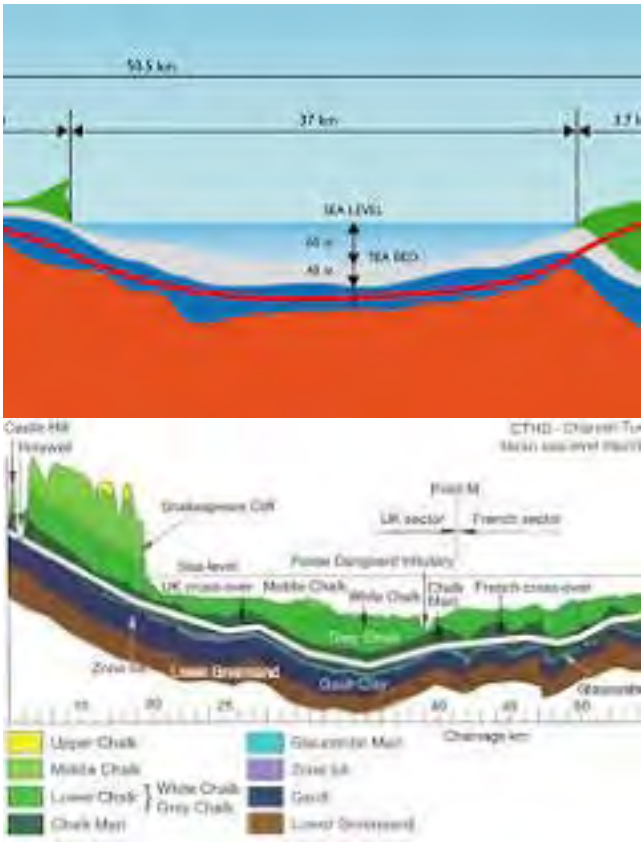
Length: 163,680 feet (31 miles)
Purpose: Railway
Setting: Underwater
Materials: Steel, concrete
Engineer(s): Transmanche Link Engineering Firm

Notes on the French/British Chunnel

How deep is the Channel Tunnel? At its deepest, the tunnel is 75 meters (246 feet) below the sea level. That's the same as 107 baguettes balancing on top of each other. The English Channel is much deeper than the tunnel, with its deepest point measuring 175 meters (574 feet) below sea level. At 37.9 kilometres (23.5 miles), it has the longest underwater section of any tunnel in the world and is the third-longest railway tunnel in the world.

The Channel Tunnel | Euro Tunnel - Eurostar

Eurostar
https://www.eurostar.com › ... › Eurostar experience



Does the channel tunnel go under the sea bed?
Yes, the Channel Tunnel is underwater, but it is also built below the sea bed, so you don't actually see the sea while you are travelling. That would be quite a unique engineering achievement! Actually all underwater transport tunnels are built like this. The tunnel is 75 metres below sea level at its deepest point.

How long are you underwater in the channel tunnel?

You are only in the underground Chunnel for about 30-35 minutes.

How deep is the Eurotunnel in miles?
At its lowest point, the tunnel is 75 metres (246 feet) below the sea bed and 115 metres (377 feet) below sea level. At 37.9 kilometres (23.5 miles), it has the longest underwater section of any tunnel in the world and is the third-longest railway tunnel in the world.

Attachments: CALII - LOSSAN Corridor - LT SANDAG (DEIR) - 25JUN25.docx
CALII - LOSSAN Corridor - Board Background - V3 - 19FEB25.docx

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From: Mike Boyle <mjcboyle@san.rr.com>
Sent: Tuesday, July 1, 2025 1:13:48 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: LOSSAN Corridor - Reasonable Alternatives per CERCLA

Sir/Madam – Please find enclosed our comments on two systems which are "reasonable alternatives" for the rail line pursuant to CERCLA. Also enclosed is a summary of our nonprofit group's background. Thank you for your consideration, Mike Boyle

California Infrastructure Institute
13482 Caminito Carmel
Del Mar, CA 92014
(619) 846-1243
mjcboyle@san.rr.com
June 19, 2025

Via UPS & Email

SANDAG
Attn: LOSSAN Comments
1011 Union Street, Suite 400
San Diego, CA 92101

RE: The LOSSAN Corridor - Reasonable Alternatives

Dear Sir/Madam:

We are a not-for-profit group that seeks to facilitate responsible change in our transportation sector as a means to address growing problems. There are two technologies which we believe are "reasonable alternatives" to consider under CEQA for long-term LOSSAN Corridor improvement. Examined in more detail in this communication are: 1) monorail system technologies for transporting passengers; and 2) a newer technology for electrified movement of freight via elevated guideways for improved safety and land use.

The growing problems these technologies address include emissions, congestion, affordability, financing, land use issues, environmental protection and more. While our state has worked hard to address the emissions which contribute to climate change, our transportation sector is responsible for nearly half of our carbon (CO2), 80% of our Nitrogen Oxide (NOx) and 90% of our fine diesel particulate matter (PM2.5) air pollution. Ironically, as our global heat levels have grown, the melting ice and expansion of water have contributed to the rise in sea levels, which in turn are one cause of the bluff failures and landslides that now threaten the stability of the LOSSAN Corridor's railroad tracks.

The environmental clock is not just ticking along our SoCal coastline in Del Mar and San Clemente where the train tracks fail. A San Diego Union Tribune article from of March 18, 2024 reports:

> "California is poised to fail to meet its ambitious greenhouse gas reduction goals by the end of the decade … Although the state has pledged to slash planet-warming emissions by 40 percent of 1990 levels by 2030, the state is not on track to meet that commitment … emissions have fallen just 11.5 percent below those of 1990 … Based on the trajectory of reductions since 2010, California won't attain the mandated goal until 2047."

As mentioned previously, the rise of sea levels in coastal Southern California has accelerated bluff erosion and increased the risk of failures and landslides. Some examples of the risks include a suspension of rail service between San Diego and Orange County for six weeks beginning April 28, 2025 to enable work to repair vulnerable segments of track. Also, there have been five Corridor rail closures between 2021 and 2024 because of the erosion and landslides in San Clemente alone.

The increase in emissions is not our region's only growing transportation problem. Another is the shortage of affordable housing in both San Diego and other coastal Southern California cities. This problem has caused many households with lower incomes to migrate away from centralized coastal cities to other locales offering a more budget-friendly living experience. In turn this has required a heavier reliance on automobiles which, along with limited public transportation options, is creating more congestion.

THE MONORAIL

The monorail is a passenger transportation system with cars which are guided, supported and ride either above or below a single beam. While monorails can operate at both underground and grade level, most operate upon an elevated guideway. At this time there are more than 60 monorails already built and in operation or under construction around the world. Some of monorail's benefits over traditional rail include: it has a minor footprint that requires less ground space; it operates upon elevated guideways eliminating collisions and reducing congestion; it is powered by electricity and creates no carbon emissions; and compared to rail it is relatively quiet during operation.

Walt Disney World's Monorail System

As mentioned previously, the rise of sea levels in coastal Southern California has accelerated bluff erosion and increased the risk of failures and landslides. Some examples of the risks include the suspension of all rail service between San Diego and Orange County for six weeks beginning April 28, 2025 in order to enable work required to repair the vulnerable segments of track. Further, there have been five closures of the rail Corridor between 2021 and 2024 due to erosion and landslides in San Clemente alone.

Currently the only long-term strategy to address the railroad's growing failures is to relocate its tracks inland under coastal cities to ensure the corridor's safety and reliability. As a result, environmental and community interests in cities like Del Mar are facing severe risks and impacts from: the double-tracking of train tunnels underneath homes and businesses; a concentration of pollution (which pose health hazards from diesel train emissions); the increase in noise and vibration; a taking of homes via eminent domain; and the risks from carrying hazardous materials in tunnels underneath homes. Additionally, the forced eminent domain will displace families, disrupt schools, accelerate taxes and destroy generational ownership of property. Construction of the tunnels alone would bring years of disruption and pollution to Del Mar and Solana Beach as well as to neighboring communities.

The Los Angeles County's Metropolitan Transportation Authority ("Metro") is presently evaluating "reasonable alternatives" for a high-quality, reliable transit service option that will connect San Fernando Valley and L.A.'s Westside. It is named the Sepulveda Transit Corridor project and a Draft Environmental Impact Report (DEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) to analyze a range of transit modes, alignments, and station

locations to address the transportation needs. A Planning and Environmental Linkages ("PEL") study is also being employed to evaluate the alternatives including monorail.

Below are several websites which have information on the monorail technology and its applications, including one for the LA SkyRail Express which has entered into a Predevelopment Agreement (PDA) with Metro for the Sepulveda Transit Corridor:

- LA SkyRail Express - https://laskyrailexpress.com/
- Alstom - https://www.alstom.com/company
- The Monorail Society - https://www.monorails.org/index.html

ELEVATED & ELECTRIFIED FREIGHT MOVEMENT SYSTEMS

The freight systems referred to regards technologies that have been researched and designed to move both semi-trailers and cargo containers upon an elevated, emission-free and electric-powered guideway constructed over existing rights-of-way (such as roads, railway and utility corridor ROWs). The freight system is designed to move cargo from seaports and border Ports of Entry (POEs) by transporters (driverless electric trucks) which are automated and powered by electric linear induction motors. The guideway segments are prefabricated and may largely be assembled from the deck of a guideway itself, enabling lower construction costs, shorter construction time and minimal disturbance for highway traffic. Like monorail, the system's benefits include: less ground space used; no at grade collisions; the lowering of congestion; and reduction in emissions and noise. Unlike the monorail, the construction and operation of a freight system may be undertaken and financed by a public-private partnership (with revenue provided to the public owner for leasing the air ROW).

The concept of this freight system was developed by Texas A&M University's Transportation Institute ("TTI") over decades. The TTI's name for its technology is the Freight Shuttle System (or "FSS") which originally was conceived of as being built and operated underground. After its initial research, TTI concluded that an underground FSS application: would be economically unfeasible; would require significant time to construct; would likely encounter unforeseen site conditions; would require significant government subsidies; and more. At that point, the

system design was modified and improved for low-impact above-ground applications. TTI has described the FSS' purpose as:

> "The Freight Shuttle System (FSS) was conceived to resolve freight transportation's most pressing needs: a dedicated system suitable for high-volume traffic between two points located less than 500 miles apart and one that ideally segregates freight from passenger traffic. This situation occurs frequently at seaports, landside ports of entry, and congested urban and rural freight corridors … FSS is designed to blend into today's intermodal network, integrating proven technologies with novel, patented designs into a new mode of transportation. The FSS transports 53- and 54-foot truck trailers and up to 45-foot ocean containers that would normally move by truck, taking them off congested roads and onto an elevated guideway built within existing highway right of way. Properly integrated into existing rail and trucking products, the system can help regional economic stakeholders improve their end-to-end transportation solution by easing the flow of freight through congested areas and traffic chokepoints and across borders. The FSS also supports a scan-in-motion technology to promote secure trade at border crossings. Scanning stations will allow for 100 percent inspection of each FSS vehicle using high-energy scanning equipment."

Another similar form of freight system is in development by Green Corridors, LLC. The Green Corridors' version is named the Intelligent Freight Transportation System ("IFTS"). The characteristics and intended benefits are similar to those previously mentioned: it operates upon an elevated guideway (improving safety and lowering congestion); is powered electrically (reducing emissions); is automated and has mechanized freight handling; can improve freight movement time and security at seaports and POEs; and more.

Green Corridors, LLC has reached an agreement with Laredo, Texas for construction, maintenance and operation of an IFTS application. A Presidential Permit, issued on June 9, 2025, formalized the agreement for application of the IFTS technology to connect a border POE from Laredo, Texas to Monterrey, Mexico by crossing the Rio Grande River. The Presidential Permit allows five years in order for implementation of the IFTS technology to be achieved.

Green Corridor IFTS

The following are websites providing more information on the freight systems that have been researched and developed by the TTI's FSS and the Green Corridor's IFTS. The issuance of a Presidential Permit to Green Corridors for a cross border application at the Laredo, Texas POE has been a significant development:

- FSS - https://tti.tamu.edu/wp-content/uploads/2016/09/FSS_handout_6.pdf
- FSS - https://policy.tti.tamu.edu/wp-content/uploads/2015/10/Freight-Shuttle.pdf
- IFTS - Green Corridors, LLC - https://greencorridors.com/
- IFTS - Green Corridors Laredo Monterrey Project Video & More- https://greencorridors.com/laredo-project/
- IFTS - Green Corridors' Presidential Permit - https://www.whitehouse.gov/presidential-actions/2025/06/presidential-permit-authorizing-green-corridors-llc-to-construct-maintain-and-operate-commercial-elevated-guideway-border-crossing-near-laredo-texas-at-the-international-boundary-between-the-us-mexico/

CONCLUSION

As mentioned earlier, issues such as the rising cost of coastal housing in San Diego (as well as in L.A. and Orange Counties) is causing movement of lower income residents to the Inland Empire. The increase in their commute time as well as the growing cost of transportation, congestion and other problems discussed highlight

the need for responsible change. The technologies discussed hold promise to not only benefit those living in coastal areas of SoCal but also our inland commuters and our SoCal ports (in San Diego, L.A. and Long Beach). The connection of our ports and the Otay Mesa border POE to the railhead in Colton could significantly address many of the issues that are discussed above.

In conclusion, we believe that both the monorail and freight system technologies discussed offer not only the opportunity to address serious transportation issues facing Del Mar, San Clemente and the LOSSAN Corridor, but to further initiate a wider look at their potential to reduce the serious impacts upon state, country and the world such as:

1. Improving air quality - Electric power makes both monorail and the freight system sustainable and environmentally friendly;
2. Reducing maintenance – Increasing transit ridership and reducing our truck-induced infrastructure damage lowers road "wear & tear";
3. Improving safety - Automated vehicles operating on elevated guideways above roads can lower the risk of accidents;
4. Reducing congestion – Lowering auto, truck and train usage can increase availability of existing highway space;
5. Lowering construction impacts - Prefabricated guideways with a low footprint installed from the top of their decks can cause minimal interruption for traffic.

We appreciate your consideration of the two technologies discussed and look forward to further addressing our transportation related issues.

Very Truly Yours,

California Infrastructure Institute ("CALII")

Enclosure

cc: Mario Orso, SANDAG CEO
Maria Rodriguez-Molina, SANDAG Dir. Mega Proj., Border & Goods Mov.
Lesa Heebner, SANDAG Chair & Mayor of Solana Beach
Terry Gaasterland, Mayor of Del Mar

CALIFORNIA INFRASTRUCTURE INSTITUTE

NONPROFIT CALII BOARD MEMBERS & TECHNICAL SUPPORT

CALII is a 501(c)(3) non-profit corporation formed by a group of concerned and interested private citizens having diverse and relevant professional qualifications. It was formed as a non-partisan, independent, objective and technologically agnostic catalyst for collaboration between government, business and academia. The goal is for CALII to give voice to objective information and reason that will move our society toward needed innovation and change. Our Board members' efforts are conducted on a pro-bono basis. None of them have a financial stake in the outcome of CALII's projects or recommendations.

James A. Kelly, Chairman of the Board

Jim retired as the Senior Vice President of Transmission and Distribution for Southern California Edison, charged with operating & maintaining a 50,000 square mile electrical grid. He held other posts with Edison, including Vice President of Engineering and Vice President of Regulatory Compliance & Environmental Affairs. Since his retirement, Jim has served on a number of corporate boards in the energy space, as CEO of an energy storage company, and as an advisor to utilities, utility suppliers and government agencies.

Dr. Catherine Burke

Catie is an Associate Professor Emerita of the University of Southern California who, in addition to being both an accomplished lecturer and author on organization and systems design as well as leadership and management, has advised national and local government and is an advocate of innovating to resolve problems and improve our urban, freight and inter-city mobility.

Michael F. Boyle, Secretary – Treasurer

Mike retired from the practice of law as a partner with the San Diego firm of Higgs, Fletcher & Mack after decades representing design professionals, contractors, public/private entities and others on diverse construction projects. Mike has also served as a reserve officer with the U.S. Army's Corps of Engineers, an instructor for continuing legal education, chair of SANDAG's ITOC (Independent Taxpayer Oversight Committee) and on other community boards.

Everett L. (Lin) Midkiff, Community Member providing Technical Support

Lin has 45 years of systems engineering experience in the aerospace industry, serving in various roles on military, national security, and civil space programs. At The Aerospace Corporation, a Federally Funded Research and Development Center (FFRDC), he focused on civil and commercial technology applications in areas including alternative energy and advanced transportation systems. Since 2000 he has conducted private consulting engagements for in-flight entertainment and data communications services for clients including Boeing and Thales Aerospace, as well as project formulation support for interplanetary space exploration initiatives at NASA's Jet Propulsion Laboratory.

From: Carolyn Krammer <carolnoceanside@cs.com>
Sent: Wednesday, June 25, 2025 10:31:26 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG, **we do not support** the Del Mar Double Track Reinforced Alternative. This would mean certain doom for the bluffs and beaches that over a million people per year love and frequent very often. We totally support your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch.
We need to preserve and protect what remains of our natural bluffs. By continuing to armor this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources.

Beach replenishment is not durable over the long-term with the current situation and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, we urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. The tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

Carolyn Krammer, Chairperson
Citizens for the Preservation of Parks & Beaches
Oceanside, CA

Attachments: COALITION UPDATED NOP SUBMISSION OF NORTHERN YELLOW LINE ROUTE 6.23.25.pdf

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From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Sunday, June 22, 2025 1:30 PM
To: maria.rodriguez@sdcounty.ca.gov; Keith Greer <Keith.Greer@sandag.org>; Danny Veeh <Danny.Veeh@sandag.org>
Subject: Formal NOP Response to the LOSSAN Rail Alignment Project from the "Coalition for Safer Trains"

Dear Maria, Keith, and Danny,

Subject: Formal submission Response to the LOSSAN Rail Alignment Project from the Coalition for Safer Trains:

Please find attached the Formal Submission from the "Coalition for Safer Trains", in Response to the LOSSAN Rail Alignment NOP, June 22nd, 2025. We thank you for your efforts, and the opportunity to work with your team to create an alignment with the least impact to our communities. Please feel free to reach out to us with any questions.

Kind Regards,

Angelina Neglia
Coalition for Safer Trains
Angelina Neglia
Healthcare/Educational Advocate
angie.neglia@gmail.com
(858) 945 8827
CALTASH 2024 Recipient, Advocating for People with Disabilities
2024 Nominee, Senator Blakespear's "Women Who Inspire"

COALITION FOR SAFER TRAINS

June 23, 2025

Dear SANDAG:

Re: Citizens' Comment on Updated May 15, 2025 Notice of Preparation and Submission of Alternative Rail Realignment EIR Study Route: "Northern Yellow Line."

I. PRELIMINARY STATEMENT

The Coalition for Safer Trains ("Coalition") is a grassroots organization of concerned residents who own homes or businesses in the immediate geographic areas of SANDAG's currently proposed study routes for rail realignment, all of which pose substantial adverse impacts to the community.

There is, however, a realignment route that greatly minimizes the adverse impact of realignment to the hosting communities and businesses while enhancing rail service, that has the support of residents. It is shown in this letter and is referred to as the **Northern Yellow Line**. SANDAG's CEO Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings where the Board voted on proposed study routes and later approved the minutes from prior meetings, that he was **"committed"** to study this route in the Environmental Impact Report, citing lack of sufficient time to develop the route as the reason that it was not formally part of the recommended routes by the time of the SANDAG Board voting meeting. We rely on his stated commitment and look forward to the inclusion of the **Northern Yellow Line** in the EIR.

The NOP's stated Project Goal ("to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN corridor") is fatally flawed and short sighted because it prioritizes speed and operations of the rail stakeholders over avoiding adverse impacts to the community. The appropriate Project Goal would be *to avoid and minimize adverse impacts to the communities hosting the realignment while enhancing rail transportation*. In general, the three proposed routes that SANDAG approved for study that are not on the Del Mar Bluffs would force a government take-over of homes by eminent domain or bore a double-track tunnel directly under our homes or run the trains so close to homes so as to destroy the quality of living for the residents and greatly devalue their homes. These routes would also place air-polluting portals proximal to homes, businesses and the coast. The fourth option, the "double-track-the Bluffs" option as well as the mis-named "no-build" option would destroy the Del Mar Bluffs and Del Mar beaches.

The City of Del Mar is the stakeholder most profoundly affected by the realignment, both with respect to the enormous disruption that will be caused by years-long construction and by the drastic consequences of the realignment. The burdens that accompany the benefits from realignment should be shared by stakeholders who are receiving the benefits. The need for realignment has been caused by natural forces, not any action of Del Mar. Because the realignment is designed to benefit several stakeholders - the Fairgrounds (taxpayer funded special

events platform), Solana Beach (retains its station), NCTD, BNSF, AMTRAK, COASTER, SPRINTER and all of San Diego (double-track rail service) - its adverse consequences must not fall solely or disproportionately on Del Mar, and the selection of a route that minimizes community and environmental impacts must be chosen over high speed in a densely populated community.

II. NOP HISTORY AND CITIZEN SUBMISSION OF THE NORTHERN YELLOW LINE FOR EIR STUDY

SANDAG published its first Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Rail Realignment Project on June 4, 2024. The NOP proposed the study of three realignment routes: Route A (a tunnel route around the Fairgrounds), Route B (a Crest Canyon tunnel route under Del Mar residential housing), and Route C (a Camino Del Mar tunnel route under Del Mar's main street).

All three routes presaged severe adverse effects to homes and businesses of the hosting community and transparently favored rail stakeholder interests in hyper-train speed through a densely populated community over avoiding adverse community impacts. In over 1500 public and institutional comments, all three routes received scathing criticism. When new SANDAG executive management stepped in, CEO Mario Orso commissioned a "Value Analysis" which articulated, as a shared project objective, minimizing adverse impacts to the communities surrounding the realignment. Unfortunately, notwithstanding repeated criticism of the Crest Canyon and Camino Del Mar routes during the Value Analysis and prior community outreach meetings, at its conclusion, SANDAG engineers recommended the study of slightly modified versions of those two highly criticized routes borrowed from the original NOP, hoping to maximize speed. SANDAG engineers also recommended an additional route that would avoid portals and tunnels under residences (the San Dieguito Bridge to I-5 route), but which routes the tracks close to homes and businesses and through the protected San Dieguito Lagoon. Finally, SANDAG's staff recommended for study a new route option that would double-track the deteriorating Del Mar Bluffs and will study a so-called "no build" option, which would, despite the name, require perpetual building and shoring of the failing bluffs, costing billions of dollars in funding over decades, continue to block access to the coast, and will destroy Del Mar's beaches. The CA Coastal Commission promptly opposed the two bluff routes.[1]

Finding all five alternatives alarmingly unsatisfactory, citizens met with engineers to formulate an alternative, the **Northern Yellow Line**, a simplified concept that essentially would move SANDAG's San Dieguito Bridge to I-5 alternative route (SANDAG's yellow route) approximately 600 ft. further north. The **Northern Yellow Line** would eliminate: (1) tunneling under neighborhoods; (2) concentrated-pollution spewing portals near the coast, homes or Fairgrounds; (3) costly infrastructure needed to ward off flooding (sea level rise, underground water rising), required by the other routes, (4) eminent domain of homes and businesses; and (5) the danger of road grade crossings (which was the number 1 goal articulated by SANDAG).

The following chart shows the **Northern Yellow Line** superimposed onto SANDAG's staff's May 15, 2025 map shown in its NOP of the four alternative routes:

[1] See: February 27, 2025 letter of Wesley Horn, Senior Environmental Scientist, Energy, Ocean Resources and Federal Consistency Division, California Coastal Commission, to the SANDAG Board of Directors.

Figure 3. Four Project Alternative Alignments

Citizens proposed the Northern Yellow Line route in public comments to SANDAG executive leadership and realignment engineers at a Del Mar City Council meeting and SANDAG Board meetings and in writing to SANDAG board members. At the February 28, 2025 meeting of the SANDAG Board where Board members were scheduled to vote on the route recommendations, after hearing public comment, Board Member Bruce Ehlers specifically questioned why the Northern Yellow Line route proposed by Del Mar citizens was not on the recommended study list. Board members Rebecca Jones, Kevin Shin and Jack Fisher asked questions pertaining to concerns about eminent domain of homes and businesses and tunneling under the entire town of Del Mar. SANDAG CEO Mario Orso responded that he was "committed" to studying the Northern Yellow Line route in the EIR, alluding to insufficient time for his engineers to have pre-studied it to add it to the study recommendations for the vote. Having received Mr. Orso's commitment, the Board moved forward to vote. We citizens therefore anticipate that the EIR *will include* the study of the Northern Yellow Line to the same degree of detail and with the same objectivity accorded the other routes.

III. Coalition submission of the "Northern Yellow Line."

In response to the updated NOP, the Coalition submits for study in the EIR, the **Northern Yellow Line** rail route that would be located north of SANDAG'S San Dieguito Bridge to I-5 alternative (depicted as the "yellow route" on the May 15, 2025 NOP) and connect to Interstate-5. The **Northern Yellow Line** is a modification of SANDAG's yellow line route, and one that meets the stated project goal of maintaining and enhancing rail operation. It also retains the Fairgrounds special events platform and the Solana Beach and Sorrento Valley train stations, removes the tracks off the eroding bluffs, preserves the San Dieguito Lagoon and offers the opportunity to restore the Los

Penasquitos Lagoon. **More importantly, the Northern Yellow Line would not take homes from residents or destroy businesses by eminent domain or cause further damage to beaches, coastal bluffs, lagoons and canyons. This proposed route will minimize negative effects and adverse impacts to neighborhoods, businesses and the environment both during construction (which could last for more than a decade) and for decades after. This route will not interfere with evacuation routes for residents in case of emergencies which include fire, flood and earthquake. Mario Orso has conveyed to the Coalition for Safer Trains, The Northern Yellow Line route could be a few seconds slower due to the curve and lower speed pulling out of the Fairgrounds Event Platform, but they can make this up in other parts of the 351-mile LOSSAN Corridor.**

Northern Yellow Line

The Northern Yellow Line, traveling southward, is described in summary as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the **Northern Yellow Line** bridge would turn east and travel along the southern-most edge of the Fairgrounds property west of Jimmy Durante Boulevard, utilizing a 100-foot easement[2], rising in elevation until it reaches Jimmy Durante Blvd. It then would continue east above Jimmy Durante Blvd on an elevated bridge.

[2] https://www.delmar.ca.us/DocumentCenter/View/9375/Item-13---Living-Levee
On page 10 of 31 - "Place 10-foot wide pedestrian path on top of living levee - within existing 100-foot public easement for new westerly trail connection between Fairgrounds and Coast to Crest Trail"

The bridge then would continue eastward along the southern edge of the Fairgrounds property (just north of the San Dieguito Lagoon) utilizing the empty dirt at the southern edge of the Golf Driving range, (instead of taking resident's homes), until it turns and heads south to cross the lagoon, just west of the I-5. The **Northern Yellow Line** then would continue south tunneling under the I-5, emerging at the knoll south of Carmel Valley Road in San Diego. The **Northern Yellow Line** has many advantages that SANDAG's San Dieguito Bridge to I-5 "yellow line" on the May 15, 2025 NOP and the other study routes lack.

The proposed **Northern Yellow Line** would provide the following advantages.

1. **No negative impact on ANY homes or businesses.**
2. **Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.**
3. **Places no air-polluting portals near homes, near the coast or near the Fairgrounds.**
4. **Bores no tunnels under or near homes.**
5. **Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an easement for which compensation can be paid to the Fairgrounds without displacing families.**
6. **No negative impact on the City of Solana Beach.**
7. **Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.**
8. **Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.**
9. **Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.**
10. **Is expected to cost considerably less than other routes that require tunneling and eminent domain of homes and businesses.**
11. **Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delay.**

IV. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO SANDAG'S PROPOSED SAN DIEGUITO BRIDGE TO I-5 ALIGNMENT

SANDAG's San Dieguito Drive Bridge to I-5 alignment or SANDAG's "Yellow Line Route" shown on the May 15, 2025 NOP has substantial adverse community effects that the **Northern Yellow Line** would avoid:

1. The San Dieguito Drive Bridge to I-5 alignment would adversely impact over 60 homes and businesses (including Del Mar Blueprint, and View Point Brewery) on San Dieguito Drive and Racetrack View Drive because the elevated train would run proximal to homes and businesses. This would result in either eminent domain taking of property or virtual elimination of property value due to proximity of the train to the neighborhood.
2. In contrast, the **Northern Yellow Line** would move the trajectory of the SANDAG Yellow Line Route approximately 600 ft. to the north. The route would utilize a small fraction of the Fairgrounds 370-acre property at its southernmost boundary. Once the route crosses Jimmy Durante Blvd., it would run north of the San Dieguito Lagoon utilizing undeveloped land at the southern edge of the golf driving range.
3. The coast, the City of Del Mar and the Fairgrounds would all benefit from not having air-polluting portals proximal to the coast and residential neighborhoods that are a feature of the Camino Del Mar and the Crest Canyon routes. Instead, the portals would be located in the transportation corridor adjacent to the I-5.
4. The **Northern Yellow Line** is environmentally superior to SANDAG's yellow route because the yellow route travels in the lagoon and the Northern Yellow Line travels north of the Lagoon.

5. It is intuitively and demonstrably obvious that the **Northern Yellow Line** is far superior to SANDAG's San Dieguito Drive Bridge to I-5 alignment which involves serious negative impact to 60 plus residences and businesses. The **Northern Yellow Line** also involves negligible adverse impacts to the Fairgrounds, which benefits from a taxpayer-funded special events platform as part of the realignment.

V. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CAMINO DEL MAR ROUTE

The **Northern Yellow Line** would be far superior to the Camino Del Mar Route because:

1. The portion of the Del Mar community close to the Torrey Pines Road portal option associated with the Camino Del Mar route is densely populated. It includes the 126 condominiums of Del Mar Woods, the 97 apartments of Los Arboles, and numerous single-family homes proximal to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA:
    - **a)** **Air Quality** will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of toxic fumes and pollution from **diesel output** and other concentrated **Greenhouse Gas Emissions** spewed from the ventilation systems close to their homes.
    - **b)** Virtually continuous **Noise** of the ventilation systems and both **Noise and Vibration** of continuous freight and passenger trains descending and traveling right under their homes.
    - **c)** Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - **d)** **Weight Issues under the porous Del Mar hillside for Freight and Military Trains** carrying heavy freight such as Abrams 1 Tanks which weigh over **70 tons each**. The military carries fully loaded trains longer than the city of Del Mar carrying these tanks and support vehicles. We know SANDAG is taking boring samples throughout the hillside, but due to the porous nature of the Torrey Sandstone these boring samples would need to be literally taken every 10 feet from north to south in the hillside and at different depths. Based on research done by the Coalition for Safer Trains and other sources, there are no other tunnels built carrying freight or military trains under porous Torrey Sandstone.
    - **e)** Continuous **Noise** of trains entering and exiting the portal.
    - **f)** Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[3]
    - **g)** The risks of carrying **Hazardous Waste** transported under their homes.

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[3] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children
https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

h) The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2022 alone).

i) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.

2. In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    a) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades. Homes left next to any portals or located above a tunnel in a shallow area, will have to disclose this information if they try to sell their home. The long-term effects of this destruction will lower the resident's largest asset, their home, and also prove challenging to retain or obtain house insurance plans.
    b) The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to the Torrey Pines Beach.
    c) Elimination of pedestrian and bicycle paths during construction.
    d) The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    e) Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    f) Delivery of **Emergency Public Services** will be impeded or blocked.
    g) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    h) The loss of **additional square meters of environmentally sensitive lagoon acreage** with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon. This increased infrastructure will impact tidal patterns bringing more sand into the lagoon, impacting water flow, wildlife and the need for more sand dredging, costing millions of dollars.

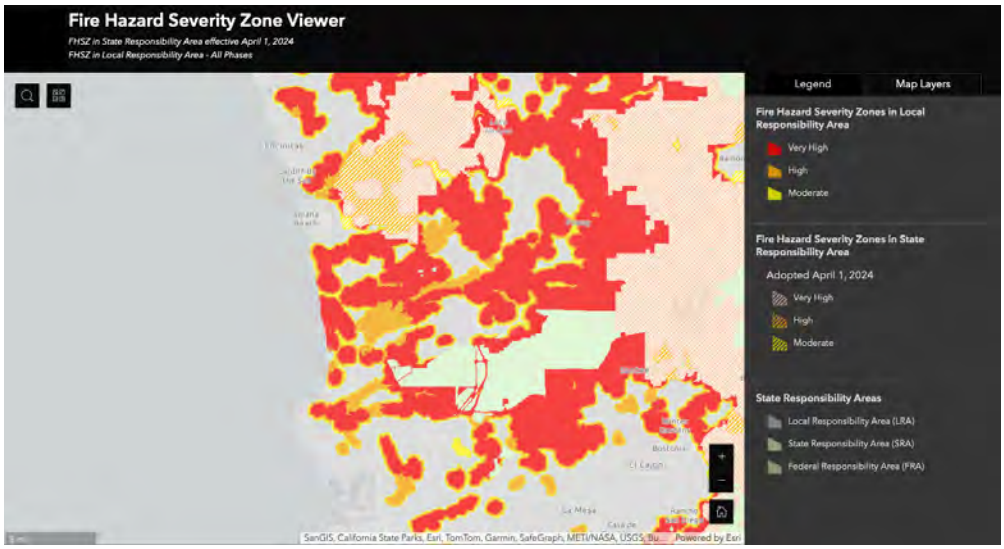
3. The Camino Del Mar route would tunnel under Del Mar's main street. As a result, the amount of disruption and destruction to Del Mar businesses in the construction process would be **continuous and extreme**. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city.
4. A double- track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    a) Virtually continuous **Noise and Vibration** of continuous freight and passenger trains traveling underground next to their homes
    b) Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans and anxiety.
    c) The risks of carrying **Hazardous Waste** near their homes
    d) The **Hazard** risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).

e) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
f) Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
g) Potential hydrology issues (sinkholes, drainage etc.) with constructing the tunnel horizontally at the bottom of the porous hillside which would reroute water flowing down the hill.

VI. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CREST CANYON ROUTE

The Crest Canyon alternative would cause all of the same ill-effects listed above as the Camino Del Mar route, only more directly and on more homes.

1. The northern portal construction and operation would inflict the **maximum** negative impact on Del Mar, its businesses, the Fairgrounds and residents. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is **certain**.
2. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.
3. The Fairgrounds would also be negatively impacted by the ventilation of concentrated diesel pollution not far from the Fairgrounds.
4. The Fire Department and other First Responders will be severely impeded in trying to reach Del Mar residents in an emergency (fire, health incident, flood, earthquake, etc.) because those services are located north of the construction area for the North Portal and tunnel entrance. Below is the latest Fire Hazard Severity Report just released from the Fire Department showing Del Mar in the highest fire risk zone.



VII. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO DOUBLE TRACKING ON THE BLUFFS

The Northern Yellow Line is far superior to SANDAG Staff's Double-Track-the-Bluffs route. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double-track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the Bluffs and beach at the expense of the public. The almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed our coast for 50 years. **According to SANDAG**, double-tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:"

> **"If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."**

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law *does not preempt* state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023, available at:

file:///C:/Users/18584/Downloads/51509%20(17).pdf

The **Northern Yellow Line** would provide the means for removing the tracks from the Bluffs while inflicting the least adverse consequences to the community and environment.

VIII. CONCLUSION

The Rail Realignment Project Goal is fatally flawed. It should be to avoid adverse effects to the communities while enhancing rail service. SANDAG's selection of study routes demonstrates a clear favoritism of rail stakeholder interests to the exclusion of the interests of the community. Residents have been pleased thus far by the appearance of engagement with the communities, but sorely disappointed in

the implementation of the input of the community most affected. Tunnelling under Del Mar has been widely and strenuously opposed but remains the most prominent alternative in SANDAG's study recommendations. SANDAG has been quick to point to its community outreach but has virtually ignored the results of that outreach to Del Mar, and the public outcry from Del Mar residents. It has also ignored the admonishments of the Coastal Commission by adding double-tracking the bluffs to the study routes.

We ask that SANDAG comply with its obligation to not just reach out to the public regarding the plan to study alternative feasible rail realignment routes in the EIR, but to actually *implement* proposals from the public to study and select a rail realignment that enhances rail service and has the least adverse impact to the communities called on to bear its consequences. As noted above, at the SANDAG Board meeting where its members voted on the staff recommendations for EIR study, Mr. Orso publicly assured the Board and residents who attended, that he was **"committed"** to studying, in the EIR, the **Northern Yellow Line**, a citizen formulated route that has the least adverse impact to the rail hosting community. We look forward to seeing a complete and objective study of the **Northern Yellow Line** in the EIR.

Respectfully submitted,

COALITION FOR SAFER TRAINS,

By:

Angelina Neglia

Cc: SANDAG Board of Directors
SANDAG CEO Mario Orso
SANDAG Realignment Project team
Congressman Mike Levin
Senator Catherine Blakespear
Del Mar City Council

Attachments: COALITION UPDATED NOP SUBMISSION OF NORTHERN YELLOW LINE ROUTE 6.23.25.pdf

From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Sunday, June 22, 2025 1:10 PM
To: Mario Orso <Mario.Orso@SANDAG.org>; Dawn Vettese <dawn.vettese@sandag.org>; Amberlynn Deaton <amberlynn.deaton@sandag.org>
Subject: Formal NOP Response, Submission of 351 LOSSAN Rail Alignment from the Coalition for Safer Trains

Dear Mario, Dawn Vettese and Amberlynn Deaton,

Please find attached the Formal Submission from the "Coalition for Safer Trains", in Response to the LOSSAN Rail Alignment NOP, June 22nd, 2025. We thank you for your efforts, and the opportunity to work with your team to create an alignment with the least impact to our communities. Please feel free to reach out to us with any questions.

Kind Regards,

Angelina Neglia
Coalition for Safer Trains
Angelina Neglia
Healthcare/Educational Advocate
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CALTASH 2024 Recipient, Advocating for People with Disabilities
2024 Nominee, Senator Blakespear's "Women Who Inspire"

COALITION FOR SAFER TRAINS

June 23, 2025

Dear SANDAG:

Re: Citizens' Comment on Updated May 15, 2025 Notice of Preparation and Submission of Alternative Rail Realignment EIR Study Route: "Northern Yellow Line."

I. PRELIMINARY STATEMENT

The Coalition for Safer Trains ("Coalition") is a grassroots organization of concerned residents who own homes or businesses in the immediate geographic areas of SANDAG's currently proposed study routes for rail realignment, all of which pose substantial adverse impacts to the community.

There is, however, a realignment route that greatly minimizes the adverse impact of realignment to the hosting communities and businesses while enhancing rail service, that has the support of residents. It is shown in this letter and is referred to as the **Northern Yellow Line**. SANDAG's CEO Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings where the Board voted on proposed study routes and later approved the minutes from prior meetings, that he was **"committed"** to study this route in the Environmental Impact Report, citing lack of sufficient time to develop the route as the reason that it was not formally part of the recommended routes by the time of the SANDAG Board voting meeting. We rely on his stated commitment and look forward to the inclusion of the **Northern Yellow Line** in the EIR.

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The City of Del Mar is the stakeholder most profoundly affected by the realignment, both with respect to the enormous disruption that will be caused by years-long construction and by the drastic consequences of the realignment. The burdens that accompany the benefits from realignment should be shared by stakeholders who are receiving the benefits. The need for realignment has been caused by natural forces, not any action of Del Mar. Because the realignment is designed to benefit several stakeholders - the Fairgrounds (taxpayer funded special

events platform), Solana Beach (retains its station), NCTD, BNSF, AMTRAK, COASTER, SPRINTER and all of San Diego (double-track rail service) - its adverse consequences must not fall solely or disproportionately on Del Mar, and the selection of a route that minimizes community and environmental impacts must be chosen over high speed in a densely populated community.

II. NOP HISTORY AND CITIZEN SUBMISSION OF THE NORTHERN YELLOW LINE FOR EIR STUDY

SANDAG published its first Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Rail Realignment Project on June 4, 2024. The NOP proposed the study of three realignment routes: Route A (a tunnel route around the Fairgrounds), Route B (a Crest Canyon tunnel route under Del Mar residential housing), and Route C (a Camino Del Mar tunnel route under Del Mar's main street).

All three routes presaged severe adverse effects to homes and businesses of the hosting community and transparently favored rail stakeholder interests in hyper-train speed through a densely populated community over avoiding adverse community impacts. In over 1500 public and institutional comments, all three routes received scathing criticism. When new SANDAG executive management stepped in, CEO Mario Orso commissioned a "Value Analysis" which articulated, as a shared project objective, minimizing adverse impacts to the communities surrounding the realignment. Unfortunately, notwithstanding repeated criticism of the Crest Canyon and Camino Del Mar routes during the Value Analysis and prior community outreach meetings, at its conclusion, SANDAG engineers recommended the study of slightly modified versions of those two highly criticized routes borrowed from the original NOP, hoping to maximize speed. SANDAG engineers also recommended an additional route that would avoid portals and tunnels under residences (the San Dieguito Bridge to I-5 route), but which routes the tracks close to homes and businesses and through the protected San Dieguito Lagoon. Finally, SANDAG's staff recommended for study a new route option that would double-track the deteriorating Del Mar Bluffs and will study a so-called "no build" option, which would, despite the name, require perpetual building and shoring of the failing bluffs, costing billions of dollars in funding over decades, continue to block access to the coast, and will destroy Del Mar's beaches. The CA Coastal Commission promptly opposed the two bluff routes.[1]

Finding all five alternatives alarmingly unsatisfactory, citizens met with engineers to formulate an alternative, the **Northern Yellow Line**, a simplified concept that essentially would move SANDAG's San Dieguito Bridge to I-5 alternative route (SANDAG's yellow route) approximately 600 ft. further north. The **Northern Yellow Line** would eliminate: (1) tunneling under neighborhoods; (2) concentrated-pollution spewing portals near the coast, homes or Fairgrounds; (3) costly infrastructure needed to ward off flooding (sea level rise, underground water rising), required by the other routes, (4) eminent domain of homes and businesses; and (5) the danger of road grade crossings (which was the number 1 goal articulated by SANDAG).

The following chart shows the **Northern Yellow Line** superimposed onto SANDAG's staff's May 15, 2025 map shown in its NOP of the four alternative routes:

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Citizens proposed the Northern Yellow Line route in public comments to SANDAG executive leadership and realignment engineers at a Del Mar City Council meeting and SANDAG Board meetings and in writing to SANDAG board members. At the February 28, 2025 meeting of the SANDAG Board where Board members were scheduled to vote on the route recommendations, after hearing public comment, Board Member Bruce Ehlers specifically questioned why the Northern Yellow Line route proposed by Del Mar citizens was not on the recommended study list. Board members Rebecca Jones, Kevin Shin and Jack Fisher asked questions pertaining to concerns about eminent domain of homes and businesses and tunneling under the entire town of Del Mar. SANDAG CEO Mario Orso responded that he was "committed" to studying the Northern Yellow Line route in the EIR, alluding to insufficient time for his engineers to have pre-studied it to add it to the study recommendations for the vote. Having received Mr. Orso's commitment, the Board moved forward to vote. We citizens therefore anticipate that the EIR *will include* the study of the Northern Yellow Line to the same degree of detail and with the same objectivity accorded the other routes.

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Penasquitos Lagoon. **More importantly, the Northern Yellow Line would not take homes from residents or destroy businesses by eminent domain or cause further damage to beaches, coastal bluffs, lagoons and canyons. This proposed route will minimize negative effects and adverse impacts to neighborhoods, businesses and the environment both during construction (which could last for more than a decade) and for decades after. This route will not interfere with evacuation routes for residents in case of emergencies which include fire, flood and earthquake. Mario Orso has conveyed to the Coalition for Safer Trains, The Northern Yellow Line route could be a few seconds slower due to the curve and lower speed pulling out of the Fairgrounds Event Platform, but they can make this up in other parts of the 351-mile LOSSAN Corridor.**

Northern Yellow Line

The Northern Yellow Line, traveling southward, is described in summary as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the **Northern Yellow Line** bridge would turn east and travel along the southern-most edge of the Fairgrounds property west of Jimmy Durante Boulevard, utilizing a 100-foot easement[2], rising in elevation until it reaches Jimmy Durante Blvd. It then would continue east above Jimmy Durante Blvd on an elevated bridge.

[2] https://www.delmar.ca.us/DocumentCenter/View/9375/Item-13---Living-Levee
On page 10 of 31 - "Place 10-foot wide pedestrian path on top of living levee - within existing 100-foot public easement for new westerly trail connection between Fairgrounds and Coast to Crest Trail"

The bridge then would continue eastward along the southern edge of the Fairgrounds property (just north of the San Dieguito Lagoon) utilizing the empty dirt at the southern edge of the Golf Driving range, (instead of taking resident's homes), until it turns and heads south to cross the lagoon, just west of the I-5. The **Northern Yellow Line** then would continue south tunneling under the I-5, emerging at the knoll south of Carmel Valley Road in San Diego. The **Northern Yellow Line** has many advantages that SANDAG's San Dieguito Bridge to I-5 "yellow line" on the May 15, 2025 NOP and the other study routes lack.

The proposed **Northern Yellow Line** would provide the following advantages.

1. **No negative impact on ANY homes or businesses.**
2. **Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.**
3. **Places no air-polluting portals near homes, near the coast or near the Fairgrounds.**
4. **Bores no tunnels under or near homes.**
5. **Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an easement for which compensation can be paid to the Fairgrounds without displacing families.**
6. **No negative impact on the City of Solana Beach.**
7. **Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.**
8. **Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.**
9. **Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.**
10. **Is expected to cost considerably less than other routes that require tunneling and eminent domain of homes and businesses.**
11. **Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delay.**

IV. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO SANDAG'S PROPOSED SAN DIEGUITO BRIDGE TO I-5 ALIGNMENT

SANDAG's San Dieguito Drive Bridge to I-5 alignment or SANDAG's "Yellow Line Route" shown on the May 15, 2025 NOP has substantial adverse community effects that the **Northern Yellow Line** would avoid:

1. The San Dieguito Drive Bridge to I-5 alignment would adversely impact over 60 homes and businesses (including Del Mar Blueprint, and View Point Brewery) on San Dieguito Drive and Racetrack View Drive because the elevated train would run proximal to homes and businesses. This would result in either eminent domain taking of property or virtual elimination of property value due to proximity of the train to the neighborhood.
2. In contrast, the **Northern Yellow Line** would move the trajectory of the SANDAG Yellow Line Route approximately 600 ft. to the north. The route would utilize a small fraction of the Fairgrounds 370-acre property at its southernmost boundary. Once the route crosses Jimmy Durante Blvd., it would run north of the San Dieguito Lagoon utilizing undeveloped land at the southern edge of the golf driving range.
3. The coast, the City of Del Mar and the Fairgrounds would all benefit from not having air-polluting portals proximal to the coast and residential neighborhoods that are a feature of the Camino Del Mar and the Crest Canyon routes. Instead, the portals would be located in the transportation corridor adjacent to the I-5.
4. The **Northern Yellow Line** is environmentally superior to SANDAG's yellow route because the yellow route travels in the lagoon and the Northern Yellow Line travels north of the Lagoon.

5. It is intuitively and demonstrably obvious that the **Northern Yellow Line** is far superior to SANDAG's San Dieguito Drive Bridge to I-5 alignment which involves serious negative impact to 60 plus residences and businesses. The **Northern Yellow Line** also involves negligible adverse impacts to the Fairgrounds, which benefits from a taxpayer-funded special events platform as part of the realignment.

V. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CAMINO DEL MAR ROUTE

The **Northern Yellow Line** would be far superior to the Camino Del Mar Route because:

1. The portion of the Del Mar community close to the Torrey Pines Road portal option associated with the Camino Del Mar route is densely populated. It includes the 126 condominiums of Del Mar Woods, the 97 apartments of Los Arboles, and numerous single-family homes proximal to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA:
    - **a)** **Air Quality** will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of toxic fumes and pollution from **diesel output** and other concentrated **Greenhouse Gas Emissions** spewed from the ventilation systems close to their homes.
    - **b)** Virtually continuous **Noise** of the ventilation systems and both **Noise and Vibration** of continuous freight and passenger trains descending and traveling right under their homes.
    - **c)** Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - **d)** **Weight Issues under the porous Del Mar hillside for Freight and Military Trains** carrying heavy freight such as Abrams 1 Tanks which weigh over **70 tons each**. The military carries fully loaded trains longer than the city of Del Mar carrying these tanks and support vehicles. We know SANDAG is taking boring samples throughout the hillside, but due to the porous nature of the Torrey Sandstone these boring samples would need to be literally taken every 10 feet from north to south in the hillside and at different depths. Based on research done by the Coalition for Safer Trains and other sources, there are no other tunnels built carrying freight or military trains under porous Torrey Sandstone.
    - **e)** Continuous **Noise** of trains entering and exiting the portal.
    - **f)** Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[3]
    - **g)** The risks of carrying **Hazardous Waste** transported under their homes.

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[3] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children
https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

h) The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2022 alone).

i) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.

2. In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    a) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades. Homes left next to any portals or located above a tunnel in a shallow area, will have to disclose this information if they try to sell their home. The long-term effects of this destruction will lower the resident's largest asset, their home, and also prove challenging to retain or obtain house insurance plans.
    b) The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to the Torrey Pines Beach.
    c) Elimination of pedestrian and bicycle paths during construction.
    d) The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    e) Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    f) Delivery of **Emergency Public Services** will be impeded or blocked.
    g) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    h) The loss of **additional square meters of environmentally sensitive lagoon acreage** with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon. This increased infrastructure will impact tidal patterns bringing more sand into the lagoon, impacting water flow, wildlife and the need for more sand dredging, costing millions of dollars.

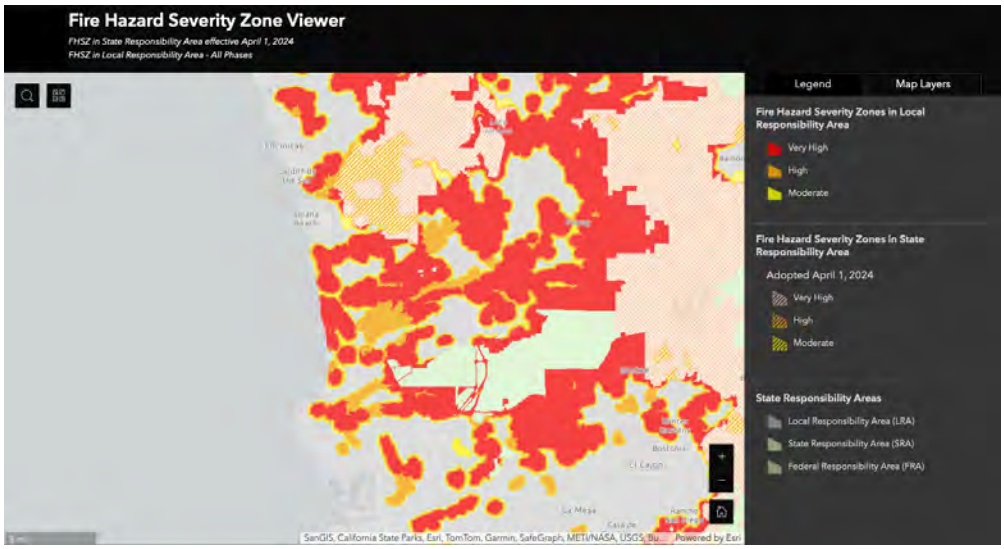
3. The Camino Del Mar route would tunnel under Del Mar's main street. As a result, the amount of disruption and destruction to Del Mar businesses in the construction process would be **continuous and extreme**. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city.
4. A double- track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    a) Virtually continuous **Noise and Vibration** of continuous freight and passenger trains traveling underground next to their homes
    b) Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans and anxiety.
    c) The risks of carrying **Hazardous Waste** near their homes
    d) The **Hazard** risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).

e) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
f) Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
g) Potential hydrology issues (sinkholes, drainage etc.) with constructing the tunnel horizontally at the bottom of the porous hillside which would reroute water flowing down the hill.

VI. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CREST CANYON ROUTE

The Crest Canyon alternative would cause all of the same ill-effects listed above as the Camino Del Mar route, only more directly and on more homes.

1. The northern portal construction and operation would inflict the **maximum** negative impact on Del Mar, its businesses, the Fairgrounds and residents. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is **certain**.
2. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.
3. The Fairgrounds would also be negatively impacted by the ventilation of concentrated diesel pollution not far from the Fairgrounds.
4. The Fire Department and other First Responders will be severely impeded in trying to reach Del Mar residents in an emergency (fire, health incident, flood, earthquake, etc.) because those services are located north of the construction area for the North Portal and tunnel entrance. Below is the latest Fire Hazard Severity Report just released from the Fire Department showing Del Mar in the highest fire risk zone.



VII. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO DOUBLE TRACKING ON THE BLUFFS

The Northern Yellow Line is far superior to SANDAG Staff's Double-Track-the-Bluffs route. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double-track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the Bluffs and beach at the expense of the public. The almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed our coast for 50 years. **According to SANDAG**, double-tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:"

> **"If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."**

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law *does not preempt* state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023, available at:

file:///C:/Users/18584/Downloads/51509%20(17).pdf

The **Northern Yellow Line** would provide the means for removing the tracks from the Bluffs while inflicting the least adverse consequences to the community and environment.

VIII. CONCLUSION

The Rail Realignment Project Goal is fatally flawed. It should be to avoid adverse effects to the communities while enhancing rail service. SANDAG's selection of study routes demonstrates a clear favoritism of rail stakeholder interests to the exclusion of the interests of the community. Residents have been pleased thus far by the appearance of engagement with the communities, but sorely disappointed in

the implementation of the input of the community most affected. Tunnelling under Del Mar has been widely and strenuously opposed but remains the most prominent alternative in SANDAG's study recommendations. SANDAG has been quick to point to its community outreach but has virtually ignored the results of that outreach to Del Mar, and the public outcry from Del Mar residents. It has also ignored the admonishments of the Coastal Commission by adding double-tracking the bluffs to the study routes.

We ask that SANDAG comply with its obligation to not just reach out to the public regarding the plan to study alternative feasible rail realignment routes in the EIR, but to actually *implement* proposals from the public to study and select a rail realignment that enhances rail service and has the least adverse impact to the communities called on to bear its consequences. As noted above, at the SANDAG Board meeting where its members voted on the staff recommendations for EIR study, Mr. Orso publicly assured the Board and residents who attended, that he was **"committed"** to studying, in the EIR, the **Northern Yellow Line**, a citizen formulated route that has the least adverse impact to the rail hosting community. We look forward to seeing a complete and objective study of the **Northern Yellow Line** in the EIR.

Respectfully submitted,

COALITION FOR SAFER TRAINS,

By:

Angelina Neglia

Cc: SANDAG Board of Directors
SANDAG CEO Mario Orso
SANDAG Realignment Project team
Congressman Mike Levin
Senator Catherine Blakespear
Del Mar City Council

Attachments: COALITION UPDATED NOP SUBMISSION OF NORTHERN YELLOW LINE ROUTE 6.23.25.pdf

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From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Sunday, June 22, 2025 1:14 PM
To: Courtney Ruby <courtney.ruby@sandag.org>; Anthony Ray <aray@arjis.org>; kelly.mikail@sandag.org; Grace Miño <grace.mino@sandag.org>; Elaine Richardson <elaine.richardson@sandag.org>
Subject: Formal response to the NOP for the LOSSAN Rail Alignment from the "Coalition for Safer Trains"

Dear Courtney, Aray, Kelly, Grace and Elaine,

Please find attached the Formal Submission from the "Coalition for Safer Trains", in Response to the LOSSAN Rail Alignment NOP, June 22nd, 2025. We thank you for your efforts, and the opportunity to work with your team to create an alignment with the least impact to our communities. Please feel free to reach out to us with any questions.

Kind Regards,

Angelina Neglia
Coalition for Safer Trains
Angelina Neglia
Healthcare/Educational Advocate
angie.neglia@gmail.com
(858) 945 8827
CALTASH 2024 Recipient, Advocating for People with Disabilities
2024 Nominee, Senator Blakespear's "Women Who Inspire"

COALITION FOR SAFER TRAINS

June 23, 2025

Dear SANDAG:

Re: Citizens' Comment on Updated May 15, 2025 Notice of Preparation and Submission of Alternative Rail Realignment EIR Study Route: "Northern Yellow Line."

I. PRELIMINARY STATEMENT

The Coalition for Safer Trains ("Coalition") is a grassroots organization of concerned residents who own homes or businesses in the immediate geographic areas of SANDAG's currently proposed study routes for rail realignment, all of which pose substantial adverse impacts to the community.

There is, however, a realignment route that greatly minimizes the adverse impact of realignment to the hosting communities and businesses while enhancing rail service, that has the support of residents. It is shown in this letter and is referred to as the **Northern Yellow Line**. SANDAG's CEO Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings where the Board voted on proposed study routes and later approved the minutes from prior meetings, that he was **"committed"** to study this route in the Environmental Impact Report, citing lack of sufficient time to develop the route as the reason that it was not formally part of the recommended routes by the time of the SANDAG Board voting meeting. We rely on his stated commitment and look forward to the inclusion of the **Northern Yellow Line** in the EIR.

The NOP's stated Project Goal ("to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN corridor") is fatally flawed and short sighted because it prioritizes speed and operations of the rail stakeholders over avoiding adverse impacts to the community. The appropriate Project Goal would be *to avoid and minimize adverse impacts to the communities hosting the realignment while enhancing rail transportation*. In general, the three proposed routes that SANDAG approved for study that are not on the Del Mar Bluffs would force a government take-over of homes by eminent domain or bore a double-track tunnel directly under our homes or run the trains so close to homes so as to destroy the quality of living for the residents and greatly devalue their homes. These routes would also place air-polluting portals proximal to homes, businesses and the coast. The fourth option, the "double-track-the Bluffs" option as well as the mis-named "no-build" option would destroy the Del Mar Bluffs and Del Mar beaches.

The City of Del Mar is the stakeholder most profoundly affected by the realignment, both with respect to the enormous disruption that will be caused by years-long construction and by the drastic consequences of the realignment. The burdens that accompany the benefits from realignment should be shared by stakeholders who are receiving the benefits. The need for realignment has been caused by natural forces, not any action of Del Mar. Because the realignment is designed to benefit several stakeholders - the Fairgrounds (taxpayer funded special

events platform), Solana Beach (retains its station), NCTD, BNSF, AMTRAK, COASTER, SPRINTER and all of San Diego (double-track rail service) - its adverse consequences must not fall solely or disproportionately on Del Mar, and the selection of a route that minimizes community and environmental impacts must be chosen over high speed in a densely populated community.

II. NOP HISTORY AND CITIZEN SUBMISSION OF THE NORTHERN YELLOW LINE FOR EIR STUDY

SANDAG published its first Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Rail Realignment Project on June 4, 2024. The NOP proposed the study of three realignment routes: Route A (a tunnel route around the Fairgrounds), Route B (a Crest Canyon tunnel route under Del Mar residential housing), and Route C (a Camino Del Mar tunnel route under Del Mar's main street).

All three routes presaged severe adverse effects to homes and businesses of the hosting community and transparently favored rail stakeholder interests in hyper-train speed through a densely populated community over avoiding adverse community impacts. In over 1500 public and institutional comments, all three routes received scathing criticism. When new SANDAG executive management stepped in, CEO Mario Orso commissioned a "Value Analysis" which articulated, as a shared project objective, minimizing adverse impacts to the communities surrounding the realignment. Unfortunately, notwithstanding repeated criticism of the Crest Canyon and Camino Del Mar routes during the Value Analysis and prior community outreach meetings, at its conclusion, SANDAG engineers recommended the study of slightly modified versions of those two highly criticized routes borrowed from the original NOP, hoping to maximize speed. SANDAG engineers also recommended an additional route that would avoid portals and tunnels under residences (the San Dieguito Bridge to I-5 route), but which routes the tracks close to homes and businesses and through the protected San Dieguito Lagoon. Finally, SANDAG's staff recommended for study a new route option that would double-track the deteriorating Del Mar Bluffs and will study a so-called "no build" option, which would, despite the name, require perpetual building and shoring of the failing bluffs, costing billions of dollars in funding over decades, continue to block access to the coast, and will destroy Del Mar's beaches. The CA Coastal Commission promptly opposed the two bluff routes.[1]

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The following chart shows the **Northern Yellow Line** superimposed onto SANDAG's staff's May 15, 2025 map shown in its NOP of the four alternative routes:

[1] See: February 27, 2025 letter of Wesley Horn, Senior Environmental Scientist, Energy, Ocean Resources and Federal Consistency Division, California Coastal Commission, to the SANDAG Board of Directors.

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Penasquitos Lagoon. **More importantly, the Northern Yellow Line would not take homes from residents or destroy businesses by eminent domain or cause further damage to beaches, coastal bluffs, lagoons and canyons. This proposed route will minimize negative effects and adverse impacts to neighborhoods, businesses and the environment both during construction (which could last for more than a decade) and for decades after. This route will not interfere with evacuation routes for residents in case of emergencies which include fire, flood and earthquake. Mario Orso has conveyed to the Coalition for Safer Trains, The Northern Yellow Line route could be a few seconds slower due to the curve and lower speed pulling out of the Fairgrounds Event Platform, but they can make this up in other parts of the 351-mile LOSSAN Corridor.**

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From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the **Northern Yellow Line** bridge would turn east and travel along the southern-most edge of the Fairgrounds property west of Jimmy Durante Boulevard, utilizing a 100-foot easement[2], rising in elevation until it reaches Jimmy Durante Blvd. It then would continue east above Jimmy Durante Blvd on an elevated bridge.

[2] https://www.delmar.ca.us/DocumentCenter/View/9375/Item-13---Living-Levee
On page 10 of 31 - "Place 10-foot wide pedestrian path on top of living levee - within existing 100-foot public easement for new westerly trail connection between Fairgrounds and Coast to Crest Trail"

The bridge then would continue eastward along the southern edge of the Fairgrounds property (just north of the San Dieguito Lagoon) utilizing the empty dirt at the southern edge of the Golf Driving range, (instead of taking resident's homes), until it turns and heads south to cross the lagoon, just west of the I-5. The **Northern Yellow Line** then would continue south tunneling under the I-5, emerging at the knoll south of Carmel Valley Road in San Diego. The **Northern Yellow Line** has many advantages that SANDAG's San Dieguito Bridge to I-5 "yellow line" on the May 15, 2025 NOP and the other study routes lack.

The proposed **Northern Yellow Line** would provide the following advantages.

1. **No negative impact on ANY homes or businesses.**
2. **Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.**
3. **Places no air-polluting portals near homes, near the coast or near the Fairgrounds.**
4. **Bores no tunnels under or near homes.**
5. **Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an easement for which compensation can be paid to the Fairgrounds without displacing families.**
6. **No negative impact on the City of Solana Beach.**
7. **Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.**
8. **Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.**
9. **Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.**
10. **Is expected to cost considerably less than other routes that require tunneling and eminent domain of homes and businesses.**
11. **Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delay.**

IV. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO SANDAG'S PROPOSED SAN DIEGUITO BRIDGE TO I-5 ALIGNMENT

SANDAG's San Dieguito Drive Bridge to I-5 alignment or SANDAG's "Yellow Line Route" shown on the May 15, 2025 NOP has substantial adverse community effects that the **Northern Yellow Line** would avoid:

1. The San Dieguito Drive Bridge to I-5 alignment would adversely impact over 60 homes and businesses (including Del Mar Blueprint, and View Point Brewery) on San Dieguito Drive and Racetrack View Drive because the elevated train would run proximal to homes and businesses. This would result in either eminent domain taking of property or virtual elimination of property value due to proximity of the train to the neighborhood.
2. In contrast, the **Northern Yellow Line** would move the trajectory of the SANDAG Yellow Line Route approximately 600 ft. to the north. The route would utilize a small fraction of the Fairgrounds 370-acre property at its southernmost boundary. Once the route crosses Jimmy Durante Blvd., it would run north of the San Dieguito Lagoon utilizing undeveloped land at the southern edge of the golf driving range.
3. The coast, the City of Del Mar and the Fairgrounds would all benefit from not having air-polluting portals proximal to the coast and residential neighborhoods that are a feature of the Camino Del Mar and the Crest Canyon routes. Instead, the portals would be located in the transportation corridor adjacent to the I-5.
4. The **Northern Yellow Line** is environmentally superior to SANDAG's yellow route because the yellow route travels in the lagoon and the Northern Yellow Line travels north of the Lagoon.

5. It is intuitively and demonstrably obvious that the **Northern Yellow Line** is far superior to SANDAG's San Dieguito Drive Bridge to I-5 alignment which involves serious negative impact to 60 plus residences and businesses. The **Northern Yellow Line** also involves negligible adverse impacts to the Fairgrounds, which benefits from a taxpayer-funded special events platform as part of the realignment.

V. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CAMINO DEL MAR ROUTE

The **Northern Yellow Line** would be far superior to the Camino Del Mar Route because:

1. The portion of the Del Mar community close to the Torrey Pines Road portal option associated with the Camino Del Mar route is densely populated. It includes the 126 condominiums of Del Mar Woods, the 97 apartments of Los Arboles, and numerous single-family homes proximal to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA:
    - **a)** **Air Quality** will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of toxic fumes and pollution from **diesel output** and other concentrated **Greenhouse Gas Emissions** spewed from the ventilation systems close to their homes.
    - **b)** Virtually continuous **Noise** of the ventilation systems and both **Noise and Vibration** of continuous freight and passenger trains descending and traveling right under their homes.
    - **c)** Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - **d)** **Weight Issues under the porous Del Mar hillside for Freight and Military Trains** carrying heavy freight such as Abrams 1 Tanks which weigh over **70 tons each**. The military carries fully loaded trains longer than the city of Del Mar carrying these tanks and support vehicles. We know SANDAG is taking boring samples throughout the hillside, but due to the porous nature of the Torrey Sandstone these boring samples would need to be literally taken every 10 feet from north to south in the hillside and at different depths. Based on research done by the Coalition for Safer Trains and other sources, there are no other tunnels built carrying freight or military trains under porous Torrey Sandstone.
    - **e)** Continuous **Noise** of trains entering and exiting the portal.
    - **f)** Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[3]
    - **g)** The risks of carrying **Hazardous Waste** transported under their homes.

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[3] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children
https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

h) The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2022 alone).

i) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.

2. In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    a) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades. Homes left next to any portals or located above a tunnel in a shallow area, will have to disclose this information if they try to sell their home. The long-term effects of this destruction will lower the resident's largest asset, their home, and also prove challenging to retain or obtain house insurance plans.
    b) The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to the Torrey Pines Beach.
    c) Elimination of pedestrian and bicycle paths during construction.
    d) The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    e) Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    f) Delivery of **Emergency Public Services** will be impeded or blocked.
    g) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    h) The loss of **additional square meters of environmentally sensitive lagoon acreage** with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon. This increased infrastructure will impact tidal patterns bringing more sand into the lagoon, impacting water flow, wildlife and the need for more sand dredging, costing millions of dollars.

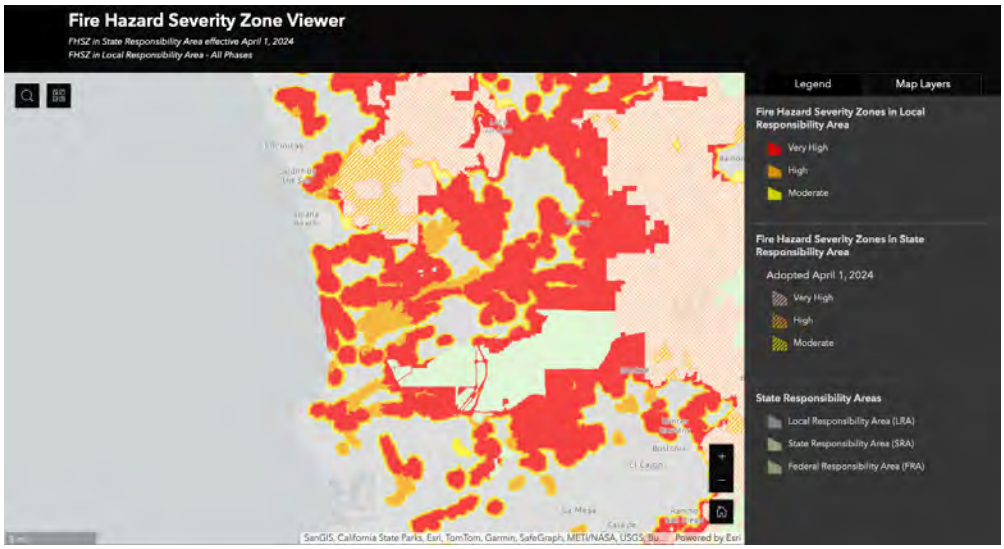
3. The Camino Del Mar route would tunnel under Del Mar's main street. As a result, the amount of disruption and destruction to Del Mar businesses in the construction process would be **continuous and extreme**. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city.
4. A double- track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    a) Virtually continuous **Noise and Vibration** of continuous freight and passenger trains traveling underground next to their homes
    b) Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans and anxiety.
    c) The risks of carrying **Hazardous Waste** near their homes
    d) The **Hazard** risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).

e) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
f) Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
g) Potential hydrology issues (sinkholes, drainage etc.) with constructing the tunnel horizontally at the bottom of the porous hillside which would reroute water flowing down the hill.

VI. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CREST CANYON ROUTE

The Crest Canyon alternative would cause all of the same ill-effects listed above as the Camino Del Mar route, only more directly and on more homes.

1. The northern portal construction and operation would inflict the **maximum** negative impact on Del Mar, its businesses, the Fairgrounds and residents. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is **certain**.
2. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.
3. The Fairgrounds would also be negatively impacted by the ventilation of concentrated diesel pollution not far from the Fairgrounds.
4. The Fire Department and other First Responders will be severely impeded in trying to reach Del Mar residents in an emergency (fire, health incident, flood, earthquake, etc.) because those services are located north of the construction area for the North Portal and tunnel entrance. Below is the latest Fire Hazard Severity Report just released from the Fire Department showing Del Mar in the highest fire risk zone.



VII. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO DOUBLE TRACKING ON THE BLUFFS

The Northern Yellow Line is far superior to SANDAG Staff's Double-Track-the-Bluffs route. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double-track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the Bluffs and beach at the expense of the public. The almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed our coast for 50 years. **According to SANDAG**, double-tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:"

> **"If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."**

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law *does not preempt* state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023, available at:

file:///C:/Users/18584/Downloads/51509%20(17).pdf

The **Northern Yellow Line** would provide the means for removing the tracks from the Bluffs while inflicting the least adverse consequences to the community and environment.

VIII. CONCLUSION

The Rail Realignment Project Goal is fatally flawed. It should be to avoid adverse effects to the communities while enhancing rail service. SANDAG's selection of study routes demonstrates a clear favoritism of rail stakeholder interests to the exclusion of the interests of the community. Residents have been pleased thus far by the appearance of engagement with the communities, but sorely disappointed in

the implementation of the input of the community most affected. Tunnelling under Del Mar has been widely and strenuously opposed but remains the most prominent alternative in SANDAG's study recommendations. SANDAG has been quick to point to its community outreach but has virtually ignored the results of that outreach to Del Mar, and the public outcry from Del Mar residents. It has also ignored the admonishments of the Coastal Commission by adding double-tracking the bluffs to the study routes.

We ask that SANDAG comply with its obligation to not just reach out to the public regarding the plan to study alternative feasible rail realignment routes in the EIR, but to actually *implement* proposals from the public to study and select a rail realignment that enhances rail service and has the least adverse impact to the communities called on to bear its consequences. As noted above, at the SANDAG Board meeting where its members voted on the staff recommendations for EIR study, Mr. Orso publicly assured the Board and residents who attended, that he was **"committed"** to studying, in the EIR, the **Northern Yellow Line**, a citizen formulated route that has the least adverse impact to the rail hosting community. We look forward to seeing a complete and objective study of the **Northern Yellow Line** in the EIR.

Respectfully submitted,

COALITION FOR SAFER TRAINS,

By:

Angelina Neglia

Cc: SANDAG Board of Directors
SANDAG CEO Mario Orso
SANDAG Realignment Project team
Congressman Mike Levin
Senator Catherine Blakespear
Del Mar City Council

Attachments: COALITION UPDATED NOP SUBMISSION OF NORTHERN YELLOW LINE ROUTE 6.23.25.pdf

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From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Monday, June 23, 2025 7:37:24 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: "SDLRR Project NOP" Formal Submission Response to the LOSSAN Rail Alignment NOP from the Coalition for Safer Trains

Please find the attached document, the formal submission response from the Coalition for Safer Trains for the LOSSAN Rail Alignment Project.

Please confirm that you received this document.

Kind Regards

Angelina Neglia
Coalition for Safer Trains
Angelina Neglia
Healthcare/Educational Advocate
angie.neglia@gmail.com
(858) 945 8827
CALTASH 2024 Recipient, Advocating for People with Disabilities
2024 Nominee, Senator Blakespear's "Women Who Inspire"

COALITION FOR SAFER TRAINS

June 23, 2025

Dear SANDAG:

Re: Citizens' Comment on Updated May 15, 2025 Notice of Preparation and Submission of Alternative Rail Realignment EIR Study Route: "Northern Yellow Line."

I. PRELIMINARY STATEMENT

The Coalition for Safer Trains ("Coalition") is a grassroots organization of concerned residents who own homes or businesses in the immediate geographic areas of SANDAG's currently proposed study routes for rail realignment, all of which pose substantial adverse impacts to the community.

There is, however, a realignment route that greatly minimizes the adverse impact of realignment to the hosting communities and businesses while enhancing rail service, that has the support of residents. It is shown in this letter and is referred to as the **Northern Yellow Line**. SANDAG's CEO Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings where the Board voted on proposed study routes and later approved the minutes from prior meetings, that he was **"committed"** to study this route in the Environmental Impact Report, citing lack of sufficient time to develop the route as the reason that it was not formally part of the recommended routes by the time of the SANDAG Board voting meeting. We rely on his stated commitment and look forward to the inclusion of the **Northern Yellow Line** in the EIR.

The NOP's stated Project Goal ("to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN corridor") is fatally flawed and short sighted because it prioritizes speed and operations of the rail stakeholders over avoiding adverse impacts to the community. The appropriate Project Goal would be *to avoid and minimize adverse impacts to the communities hosting the realignment while enhancing rail transportation*. In general, the three proposed routes that SANDAG approved for study that are not on the Del Mar Bluffs would force a government take-over of homes by eminent domain or bore a double-track tunnel directly under our homes or run the trains so close to homes so as to destroy the quality of living for the residents and greatly devalue their homes. These routes would also place air-polluting portals proximal to homes, businesses and the coast. The fourth option, the "double-track-the Bluffs" option as well as the mis-named "no-build" option would destroy the Del Mar Bluffs and Del Mar beaches.

The City of Del Mar is the stakeholder most profoundly affected by the realignment, both with respect to the enormous disruption that will be caused by years-long construction and by the drastic consequences of the realignment. The burdens that accompany the benefits from realignment should be shared by stakeholders who are receiving the benefits. The need for realignment has been caused by natural forces, not any action of Del Mar. Because the realignment is designed to benefit several stakeholders - the Fairgrounds (taxpayer funded special

events platform), Solana Beach (retains its station), NCTD, BNSF, AMTRAK, COASTER, SPRINTER and all of San Diego (double-track rail service) - its adverse consequences must not fall solely or disproportionately on Del Mar, and the selection of a route that minimizes community and environmental impacts must be chosen over high speed in a densely populated community.

II. NOP HISTORY AND CITIZEN SUBMISSION OF THE NORTHERN YELLOW LINE FOR EIR STUDY

SANDAG published its first Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Rail Realignment Project on June 4, 2024. The NOP proposed the study of three realignment routes: Route A (a tunnel route around the Fairgrounds), Route B (a Crest Canyon tunnel route under Del Mar residential housing), and Route C (a Camino Del Mar tunnel route under Del Mar's main street).

All three routes presaged severe adverse effects to homes and businesses of the hosting community and transparently favored rail stakeholder interests in hyper-train speed through a densely populated community over avoiding adverse community impacts. In over 1500 public and institutional comments, all three routes received scathing criticism. When new SANDAG executive management stepped in, CEO Mario Orso commissioned a "Value Analysis" which articulated, as a shared project objective, minimizing adverse impacts to the communities surrounding the realignment. Unfortunately, notwithstanding repeated criticism of the Crest Canyon and Camino Del Mar routes during the Value Analysis and prior community outreach meetings, at its conclusion, SANDAG engineers recommended the study of slightly modified versions of those two highly criticized routes borrowed from the original NOP, hoping to maximize speed. SANDAG engineers also recommended an additional route that would avoid portals and tunnels under residences (the San Dieguito Bridge to I-5 route), but which routes the tracks close to homes and businesses and through the protected San Dieguito Lagoon. Finally, SANDAG's staff recommended for study a new route option that would double-track the deteriorating Del Mar Bluffs and will study a so-called "no build" option, which would, despite the name, require perpetual building and shoring of the failing bluffs, costing billions of dollars in funding over decades, continue to block access to the coast, and will destroy Del Mar's beaches. The CA Coastal Commission promptly opposed the two bluff routes.[1]

Finding all five alternatives alarmingly unsatisfactory, citizens met with engineers to formulate an alternative, the **Northern Yellow Line**, a simplified concept that essentially would move SANDAG's San Dieguito Bridge to I-5 alternative route (SANDAG's yellow route) approximately 600 ft. further north. The **Northern Yellow Line** would eliminate: (1) tunneling under neighborhoods; (2) concentrated-pollution spewing portals near the coast, homes or Fairgrounds; (3) costly infrastructure needed to ward off flooding (sea level rise, underground water rising), required by the other routes, (4) eminent domain of homes and businesses; and (5) the danger of road grade crossings (which was the number 1 goal articulated by SANDAG).

The following chart shows the **Northern Yellow Line** superimposed onto SANDAG's staff's May 15, 2025 map shown in its NOP of the four alternative routes:

[1] See: February 27, 2025 letter of Wesley Horn, Senior Environmental Scientist, Energy, Ocean Resources and Federal Consistency Division, California Coastal Commission, to the SANDAG Board of Directors.

Figure 3. Four Project Alternative Alignments

Citizens proposed the Northern Yellow Line route in public comments to SANDAG executive leadership and realignment engineers at a Del Mar City Council meeting and SANDAG Board meetings and in writing to SANDAG board members. At the February 28, 2025 meeting of the SANDAG Board where Board members were scheduled to vote on the route recommendations, after hearing public comment, Board Member Bruce Ehlers specifically questioned why the Northern Yellow Line route proposed by Del Mar citizens was not on the recommended study list. Board members Rebecca Jones, Kevin Shin and Jack Fisher asked questions pertaining to concerns about eminent domain of homes and businesses and tunneling under the entire town of Del Mar. SANDAG CEO Mario Orso responded that he was "committed" to studying the Northern Yellow Line route in the EIR, alluding to insufficient time for his engineers to have pre-studied it to add it to the study recommendations for the vote. Having received Mr. Orso's commitment, the Board moved forward to vote. We citizens therefore anticipate that the EIR *will include* the study of the Northern Yellow Line to the same degree of detail and with the same objectivity accorded the other routes.

III. Coalition submission of the "Northern Yellow Line."

In response to the updated NOP, the Coalition submits for study in the EIR, the **Northern Yellow Line** rail route that would be located north of SANDAG'S San Dieguito Bridge to I-5 alternative (depicted as the "yellow route" on the May 15, 2025 NOP) and connect to Interstate-5. The **Northern Yellow Line** is a modification of SANDAG's yellow line route, and one that meets the stated project goal of maintaining and enhancing rail operation. It also retains the Fairgrounds special events platform and the Solana Beach and Sorrento Valley train stations, removes the tracks off the eroding bluffs, preserves the San Dieguito Lagoon and offers the opportunity to restore the Los

Penasquitos Lagoon. **More importantly, the Northern Yellow Line would not take homes from residents or destroy businesses by eminent domain or cause further damage to beaches, coastal bluffs, lagoons and canyons. This proposed route will minimize negative effects and adverse impacts to neighborhoods, businesses and the environment both during construction (which could last for more than a decade) and for decades after. This route will not interfere with evacuation routes for residents in case of emergencies which include fire, flood and earthquake. Mario Orso has conveyed to the Coalition for Safer Trains, The Northern Yellow Line route could be a few seconds slower due to the curve and lower speed pulling out of the Fairgrounds Event Platform, but they can make this up in other parts of the 351-mile LOSSAN Corridor.**

Northern Yellow Line

The Northern Yellow Line, traveling southward, is described in summary as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the **Northern Yellow Line** bridge would turn east and travel along the southern-most edge of the Fairgrounds property west of Jimmy Durante Boulevard, utilizing a 100-foot easement[2], rising in elevation until it reaches Jimmy Durante Blvd. It then would continue east above Jimmy Durante Blvd on an elevated bridge.

[2] https://www.delmar.ca.us/DocumentCenter/View/9375/Item-13---Living-Levee
On page 10 of 31 - "Place 10-foot wide pedestrian path on top of living levee - within existing 100-foot public easement for new westerly trail connection between Fairgrounds and Coast to Crest Trail"

The bridge then would continue eastward along the southern edge of the Fairgrounds property (just north of the San Dieguito Lagoon) utilizing the empty dirt at the southern edge of the Golf Driving range, (instead of taking resident's homes), until it turns and heads south to cross the lagoon, just west of the I-5. The **Northern Yellow Line** then would continue south tunneling under the I-5, emerging at the knoll south of Carmel Valley Road in San Diego. The **Northern Yellow Line** has many advantages that SANDAG's San Dieguito Bridge to I-5 "yellow line" on the May 15, 2025 NOP and the other study routes lack.

The proposed **Northern Yellow Line** would provide the following advantages.

1. **No negative impact on ANY homes or businesses.**
2. **Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.**
3. **Places no air-polluting portals near homes, near the coast or near the Fairgrounds.**
4. **Bores no tunnels under or near homes.**
5. **Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an easement for which compensation can be paid to the Fairgrounds without displacing families.**
6. **No negative impact on the City of Solana Beach.**
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8. **Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.**
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10. **Is expected to cost considerably less than other routes that require tunneling and eminent domain of homes and businesses.**
11. **Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delay.**

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2. In contrast, the **Northern Yellow Line** would move the trajectory of the SANDAG Yellow Line Route approximately 600 ft. to the north. The route would utilize a small fraction of the Fairgrounds 370-acre property at its southernmost boundary. Once the route crosses Jimmy Durante Blvd., it would run north of the San Dieguito Lagoon utilizing undeveloped land at the southern edge of the golf driving range.
3. The coast, the City of Del Mar and the Fairgrounds would all benefit from not having air-polluting portals proximal to the coast and residential neighborhoods that are a feature of the Camino Del Mar and the Crest Canyon routes. Instead, the portals would be located in the transportation corridor adjacent to the I-5.
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5. It is intuitively and demonstrably obvious that the **Northern Yellow Line** is far superior to SANDAG's San Dieguito Drive Bridge to I-5 alignment which involves serious negative impact to 60 plus residences and businesses. The **Northern Yellow Line** also involves negligible adverse impacts to the Fairgrounds, which benefits from a taxpayer-funded special events platform as part of the realignment.

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The **Northern Yellow Line** would be far superior to the Camino Del Mar Route because:

1. The portion of the Del Mar community close to the Torrey Pines Road portal option associated with the Camino Del Mar route is densely populated. It includes the 126 condominiums of Del Mar Woods, the 97 apartments of Los Arboles, and numerous single-family homes proximal to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA:
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    - **b)** Virtually continuous **Noise** of the ventilation systems and both **Noise and Vibration** of continuous freight and passenger trains descending and traveling right under their homes.
    - **c)** Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - **d)** **Weight Issues under the porous Del Mar hillside for Freight and Military Trains** carrying heavy freight such as Abrams 1 Tanks which weigh over **70 tons each**. The military carries fully loaded trains longer than the city of Del Mar carrying these tanks and support vehicles. We know SANDAG is taking boring samples throughout the hillside, but due to the porous nature of the Torrey Sandstone these boring samples would need to be literally taken every 10 feet from north to south in the hillside and at different depths. Based on research done by the Coalition for Safer Trains and other sources, there are no other tunnels built carrying freight or military trains under porous Torrey Sandstone.
    - **e)** Continuous **Noise** of trains entering and exiting the portal.
    - **f)** Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[3]
    - **g)** The risks of carrying **Hazardous Waste** transported under their homes.

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[3] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children
https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

h) The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2022 alone).

i) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.

2. In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    a) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades. Homes left next to any portals or located above a tunnel in a shallow area, will have to disclose this information if they try to sell their home. The long-term effects of this destruction will lower the resident's largest asset, their home, and also prove challenging to retain or obtain house insurance plans.
    b) The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to the Torrey Pines Beach.
    c) Elimination of pedestrian and bicycle paths during construction.
    d) The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    e) Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    f) Delivery of **Emergency Public Services** will be impeded or blocked.
    g) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    h) The loss of **additional square meters of environmentally sensitive lagoon acreage** with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon. This increased infrastructure will impact tidal patterns bringing more sand into the lagoon, impacting water flow, wildlife and the need for more sand dredging, costing millions of dollars.

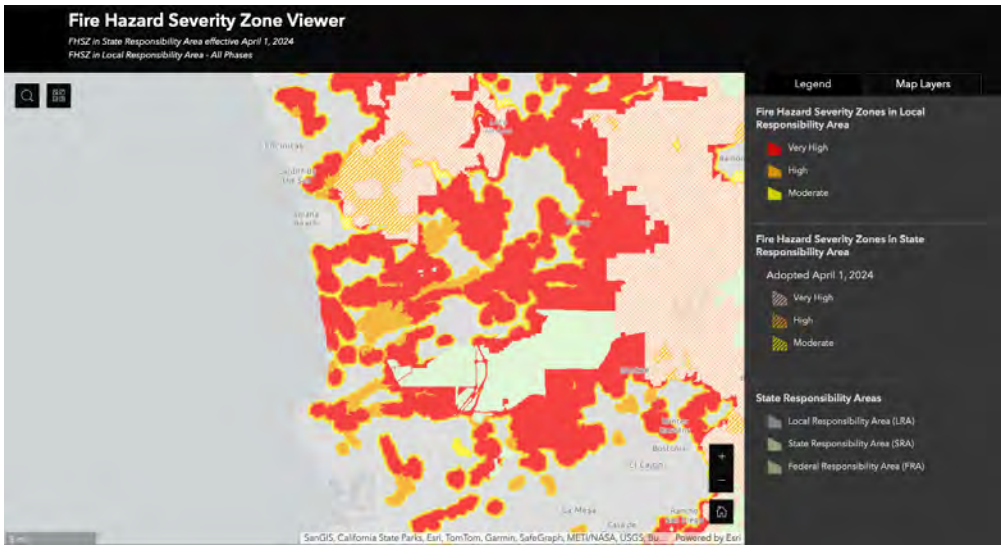
3. The Camino Del Mar route would tunnel under Del Mar's main street. As a result, the amount of disruption and destruction to Del Mar businesses in the construction process would be **continuous and extreme**. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city.
4. A double- track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    a) Virtually continuous **Noise and Vibration** of continuous freight and passenger trains traveling underground next to their homes
    b) Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans and anxiety.
    c) The risks of carrying **Hazardous Waste** near their homes
    d) The **Hazard** risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).

e) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
f) Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
g) Potential hydrology issues (sinkholes, drainage etc.) with constructing the tunnel horizontally at the bottom of the porous hillside which would reroute water flowing down the hill.

VI. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CREST CANYON ROUTE

The Crest Canyon alternative would cause all of the same ill-effects listed above as the Camino Del Mar route, only more directly and on more homes.

1. The northern portal construction and operation would inflict the **maximum** negative impact on Del Mar, its businesses, the Fairgrounds and residents. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is **certain**.
2. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.
3. The Fairgrounds would also be negatively impacted by the ventilation of concentrated diesel pollution not far from the Fairgrounds.
4. The Fire Department and other First Responders will be severely impeded in trying to reach Del Mar residents in an emergency (fire, health incident, flood, earthquake, etc.) because those services are located north of the construction area for the North Portal and tunnel entrance. Below is the latest Fire Hazard Severity Report just released from the Fire Department showing Del Mar in the highest fire risk zone.



VII. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO DOUBLE TRACKING ON THE BLUFFS

The Northern Yellow Line is far superior to SANDAG Staff's Double-Track-the-Bluffs route. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double-track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the Bluffs and beach at the expense of the public. The almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed our coast for 50 years. **According to SANDAG**, double-tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:"

> **"If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."**

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law *does not preempt* state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023, available at:

file:///C:/Users/18584/Downloads/51509%20(17).pdf

The **Northern Yellow Line** would provide the means for removing the tracks from the Bluffs while inflicting the least adverse consequences to the community and environment.

VIII. CONCLUSION

The Rail Realignment Project Goal is fatally flawed. It should be to avoid adverse effects to the communities while enhancing rail service. SANDAG's selection of study routes demonstrates a clear favoritism of rail stakeholder interests to the exclusion of the interests of the community. Residents have been pleased thus far by the appearance of engagement with the communities, but sorely disappointed in

the implementation of the input of the community most affected. Tunnelling under Del Mar has been widely and strenuously opposed but remains the most prominent alternative in SANDAG's study recommendations. SANDAG has been quick to point to its community outreach but has virtually ignored the results of that outreach to Del Mar, and the public outcry from Del Mar residents. It has also ignored the admonishments of the Coastal Commission by adding double-tracking the bluffs to the study routes.

We ask that SANDAG comply with its obligation to not just reach out to the public regarding the plan to study alternative feasible rail realignment routes in the EIR, but to actually *implement* proposals from the public to study and select a rail realignment that enhances rail service and has the least adverse impact to the communities called on to bear its consequences. As noted above, at the SANDAG Board meeting where its members voted on the staff recommendations for EIR study, Mr. Orso publicly assured the Board and residents who attended, that he was **"committed"** to studying, in the EIR, the **Northern Yellow Line**, a citizen formulated route that has the least adverse impact to the rail hosting community. We look forward to seeing a complete and objective study of the **Northern Yellow Line** in the EIR.

Respectfully submitted,

COALITION FOR SAFER TRAINS,

By:

Angelina Neglia

Cc: SANDAG Board of Directors
SANDAG CEO Mario Orso
SANDAG Realignment Project team
Congressman Mike Levin
Senator Catherine Blakespear
Del Mar City Council

Attachments: COALITION UPDATED NOP SUBMISSION OF NORTHERN YELLOW LINE ROUTE 6.23.25.pdf

From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Monday, June 23, 2025 12:33 PM
To: LOSSANcorridor <lossancorridor@sandag.org>
Subject: Formal Submission Response to the LOSSAN Rail Alignment NOP from the Coalition for Safer Trains

Please find attached the formal submission response from the Coalition for Safer Trains for the LOSSAN Rail Alignment Project.

Please confirm that you received this document.

Kind Regards

Angelina Neglia
Coalition for Safer Trains
Angelina Neglia
Healthcare/Educational Advocate
angie.neglia@gmail.com
(858) 945 8827
CALTASH 2024 Recipient, Advocating for People with Disabilities
2024 Nominee, Senator Blakespear's "Women Who Inspire"

COALITION FOR SAFER TRAINS

June 23, 2025

Dear SANDAG:

Re: Citizens' Comment on Updated May 15, 2025 Notice of Preparation and Submission of Alternative Rail Realignment EIR Study Route: "Northern Yellow Line."

I. PRELIMINARY STATEMENT

The Coalition for Safer Trains ("Coalition") is a grassroots organization of concerned residents who own homes or businesses in the immediate geographic areas of SANDAG's currently proposed study routes for rail realignment, all of which pose substantial adverse impacts to the community.

There is, however, a realignment route that greatly minimizes the adverse impact of realignment to the hosting communities and businesses while enhancing rail service, that has the support of residents. It is shown in this letter and is referred to as the **Northern Yellow Line**. SANDAG's CEO Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings where the Board voted on proposed study routes and later approved the minutes from prior meetings, that he was **"committed"** to study this route in the Environmental Impact Report, citing lack of sufficient time to develop the route as the reason that it was not formally part of the recommended routes by the time of the SANDAG Board voting meeting. We rely on his stated commitment and look forward to the inclusion of the **Northern Yellow Line** in the EIR.

The NOP's stated Project Goal ("to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN corridor") is fatally flawed and short sighted because it prioritizes speed and operations of the rail stakeholders over avoiding adverse impacts to the community. The appropriate Project Goal would be *to avoid and minimize adverse impacts to the communities hosting the realignment while enhancing rail transportation*. In general, the three proposed routes that SANDAG approved for study that are not on the Del Mar Bluffs would force a government take-over of homes by eminent domain or bore a double-track tunnel directly under our homes or run the trains so close to homes so as to destroy the quality of living for the residents and greatly devalue their homes. These routes would also place air-polluting portals proximal to homes, businesses and the coast. The fourth option, the "double-track-the Bluffs" option as well as the mis-named "no-build" option would destroy the Del Mar Bluffs and Del Mar beaches.

The City of Del Mar is the stakeholder most profoundly affected by the realignment, both with respect to the enormous disruption that will be caused by years-long construction and by the drastic consequences of the realignment. The burdens that accompany the benefits from realignment should be shared by stakeholders who are receiving the benefits. The need for realignment has been caused by natural forces, not any action of Del Mar. Because the realignment is designed to benefit several stakeholders - the Fairgrounds (taxpayer funded special

events platform), Solana Beach (retains its station), NCTD, BNSF, AMTRAK, COASTER, SPRINTER and all of San Diego (double-track rail service) - its adverse consequences must not fall solely or disproportionately on Del Mar, and the selection of a route that minimizes community and environmental impacts must be chosen over high speed in a densely populated community.

II. NOP HISTORY AND CITIZEN SUBMISSION OF THE NORTHERN YELLOW LINE FOR EIR STUDY

SANDAG published its first Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Rail Realignment Project on June 4, 2024. The NOP proposed the study of three realignment routes: Route A (a tunnel route around the Fairgrounds), Route B (a Crest Canyon tunnel route under Del Mar residential housing), and Route C (a Camino Del Mar tunnel route under Del Mar's main street).

All three routes presaged severe adverse effects to homes and businesses of the hosting community and transparently favored rail stakeholder interests in hyper-train speed through a densely populated community over avoiding adverse community impacts. In over 1500 public and institutional comments, all three routes received scathing criticism. When new SANDAG executive management stepped in, CEO Mario Orso commissioned a "Value Analysis" which articulated, as a shared project objective, minimizing adverse impacts to the communities surrounding the realignment. Unfortunately, notwithstanding repeated criticism of the Crest Canyon and Camino Del Mar routes during the Value Analysis and prior community outreach meetings, at its conclusion, SANDAG engineers recommended the study of slightly modified versions of those two highly criticized routes borrowed from the original NOP, hoping to maximize speed. SANDAG engineers also recommended an additional route that would avoid portals and tunnels under residences (the San Dieguito Bridge to I-5 route), but which routes the tracks close to homes and businesses and through the protected San Dieguito Lagoon. Finally, SANDAG's staff recommended for study a new route option that would double-track the deteriorating Del Mar Bluffs and will study a so-called "no build" option, which would, despite the name, require perpetual building and shoring of the failing bluffs, costing billions of dollars in funding over decades, continue to block access to the coast, and will destroy Del Mar's beaches. The CA Coastal Commission promptly opposed the two bluff routes.[1]

Finding all five alternatives alarmingly unsatisfactory, citizens met with engineers to formulate an alternative, the **Northern Yellow Line**, a simplified concept that essentially would move SANDAG's San Dieguito Bridge to I-5 alternative route (SANDAG's yellow route) approximately 600 ft. further north. The **Northern Yellow Line** would eliminate: (1) tunneling under neighborhoods; (2) concentrated-pollution spewing portals near the coast, homes or Fairgrounds; (3) costly infrastructure needed to ward off flooding (sea level rise, underground water rising), required by the other routes, (4) eminent domain of homes and businesses; and (5) the danger of road grade crossings (which was the number 1 goal articulated by SANDAG).

The following chart shows the **Northern Yellow Line** superimposed onto SANDAG's staff's May 15, 2025 map shown in its NOP of the four alternative routes:

[1] See: February 27, 2025 letter of Wesley Horn, Senior Environmental Scientist, Energy, Ocean Resources and Federal Consistency Division, California Coastal Commission, to the SANDAG Board of Directors.

Figure 3. Four Project Alternative Alignments

Citizens proposed the Northern Yellow Line route in public comments to SANDAG executive leadership and realignment engineers at a Del Mar City Council meeting and SANDAG Board meetings and in writing to SANDAG board members. At the February 28, 2025 meeting of the SANDAG Board where Board members were scheduled to vote on the route recommendations, after hearing public comment, Board Member Bruce Ehlers specifically questioned why the Northern Yellow Line route proposed by Del Mar citizens was not on the recommended study list. Board members Rebecca Jones, Kevin Shin and Jack Fisher asked questions pertaining to concerns about eminent domain of homes and businesses and tunneling under the entire town of Del Mar. SANDAG CEO Mario Orso responded that he was "committed" to studying the Northern Yellow Line route in the EIR, alluding to insufficient time for his engineers to have pre-studied it to add it to the study recommendations for the vote. Having received Mr. Orso's commitment, the Board moved forward to vote. We citizens therefore anticipate that the EIR *will include* the study of the Northern Yellow Line to the same degree of detail and with the same objectivity accorded the other routes.

III. Coalition submission of the "Northern Yellow Line."

In response to the updated NOP, the Coalition submits for study in the EIR, the **Northern Yellow Line** rail route that would be located north of SANDAG'S San Dieguito Bridge to I-5 alternative (depicted as the "yellow route" on the May 15, 2025 NOP) and connect to Interstate-5. The **Northern Yellow Line** is a modification of SANDAG's yellow line route, and one that meets the stated project goal of maintaining and enhancing rail operation. It also retains the Fairgrounds special events platform and the Solana Beach and Sorrento Valley train stations, removes the tracks off the eroding bluffs, preserves the San Dieguito Lagoon and offers the opportunity to restore the Los

Penasquitos Lagoon. **More importantly, the Northern Yellow Line would not take homes from residents or destroy businesses by eminent domain or cause further damage to beaches, coastal bluffs, lagoons and canyons. This proposed route will minimize negative effects and adverse impacts to neighborhoods, businesses and the environment both during construction (which could last for more than a decade) and for decades after. This route will not interfere with evacuation routes for residents in case of emergencies which include fire, flood and earthquake. Mario Orso has conveyed to the Coalition for Safer Trains, The Northern Yellow Line route could be a few seconds slower due to the curve and lower speed pulling out of the Fairgrounds Event Platform, but they can make this up in other parts of the 351-mile LOSSAN Corridor.**

Northern Yellow Line

The Northern Yellow Line, traveling southward, is described in summary as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the **Northern Yellow Line** bridge would turn east and travel along the southern-most edge of the Fairgrounds property west of Jimmy Durante Boulevard, utilizing a 100-foot easement[2], rising in elevation until it reaches Jimmy Durante Blvd. It then would continue east above Jimmy Durante Blvd on an elevated bridge.

[2] https://www.delmar.ca.us/DocumentCenter/View/9375/Item-13---Living-Levee
On page 10 of 31 - "Place 10-foot wide pedestrian path on top of living levee - within existing 100-foot public easement for new westerly trail connection between Fairgrounds and Coast to Crest Trail"

The bridge then would continue eastward along the southern edge of the Fairgrounds property (just north of the San Dieguito Lagoon) utilizing the empty dirt at the southern edge of the Golf Driving range, (instead of taking resident's homes), until it turns and heads south to cross the lagoon, just west of the I-5. The **Northern Yellow Line** then would continue south tunneling under the I-5, emerging at the knoll south of Carmel Valley Road in San Diego. The **Northern Yellow Line** has many advantages that SANDAG's San Dieguito Bridge to I-5 "yellow line" on the May 15, 2025 NOP and the other study routes lack.

The proposed **Northern Yellow Line** would provide the following advantages.

1. **No negative impact on ANY homes or businesses.**
2. **Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.**
3. **Places no air-polluting portals near homes, near the coast or near the Fairgrounds.**
4. **Bores no tunnels under or near homes.**
5. **Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an easement for which compensation can be paid to the Fairgrounds without displacing families.**
6. **No negative impact on the City of Solana Beach.**
7. **Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.**
8. **Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.**
9. **Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.**
10. **Is expected to cost considerably less than other routes that require tunneling and eminent domain of homes and businesses.**
11. **Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delay.**

IV. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO SANDAG'S PROPOSED SAN DIEGUITO BRIDGE TO I-5 ALIGNMENT

SANDAG's San Dieguito Drive Bridge to I-5 alignment or SANDAG's "Yellow Line Route" shown on the May 15, 2025 NOP has substantial adverse community effects that the **Northern Yellow Line** would avoid:

1. The San Dieguito Drive Bridge to I-5 alignment would adversely impact over 60 homes and businesses (including Del Mar Blueprint, and View Point Brewery) on San Dieguito Drive and Racetrack View Drive because the elevated train would run proximal to homes and businesses. This would result in either eminent domain taking of property or virtual elimination of property value due to proximity of the train to the neighborhood.
2. In contrast, the **Northern Yellow Line** would move the trajectory of the SANDAG Yellow Line Route approximately 600 ft. to the north. The route would utilize a small fraction of the Fairgrounds 370-acre property at its southernmost boundary. Once the route crosses Jimmy Durante Blvd., it would run north of the San Dieguito Lagoon utilizing undeveloped land at the southern edge of the golf driving range.
3. The coast, the City of Del Mar and the Fairgrounds would all benefit from not having air-polluting portals proximal to the coast and residential neighborhoods that are a feature of the Camino Del Mar and the Crest Canyon routes. Instead, the portals would be located in the transportation corridor adjacent to the I-5.
4. The **Northern Yellow Line** is environmentally superior to SANDAG's yellow route because the yellow route travels in the lagoon and the Northern Yellow Line travels north of the Lagoon.

5. It is intuitively and demonstrably obvious that the **Northern Yellow Line** is far superior to SANDAG's San Dieguito Drive Bridge to I-5 alignment which involves serious negative impact to 60 plus residences and businesses. The **Northern Yellow Line** also involves negligible adverse impacts to the Fairgrounds, which benefits from a taxpayer-funded special events platform as part of the realignment.

V. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CAMINO DEL MAR ROUTE

The **Northern Yellow Line** would be far superior to the Camino Del Mar Route because:

1. The portion of the Del Mar community close to the Torrey Pines Road portal option associated with the Camino Del Mar route is densely populated. It includes the 126 condominiums of Del Mar Woods, the 97 apartments of Los Arboles, and numerous single-family homes proximal to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA:
    - **a)** **Air Quality** will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of toxic fumes and pollution from **diesel output** and other concentrated **Greenhouse Gas Emissions** spewed from the ventilation systems close to their homes.
    - **b)** Virtually continuous **Noise** of the ventilation systems and both **Noise and Vibration** of continuous freight and passenger trains descending and traveling right under their homes.
    - **c)** Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - **d)** **Weight Issues under the porous Del Mar hillside for Freight and Military Trains** carrying heavy freight such as Abrams 1 Tanks which weigh over **70 tons each**. The military carries fully loaded trains longer than the city of Del Mar carrying these tanks and support vehicles. We know SANDAG is taking boring samples throughout the hillside, but due to the porous nature of the Torrey Sandstone these boring samples would need to be literally taken every 10 feet from north to south in the hillside and at different depths. Based on research done by the Coalition for Safer Trains and other sources, there are no other tunnels built carrying freight or military trains under porous Torrey Sandstone.
    - **e)** Continuous **Noise** of trains entering and exiting the portal.
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https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

h) The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2022 alone).

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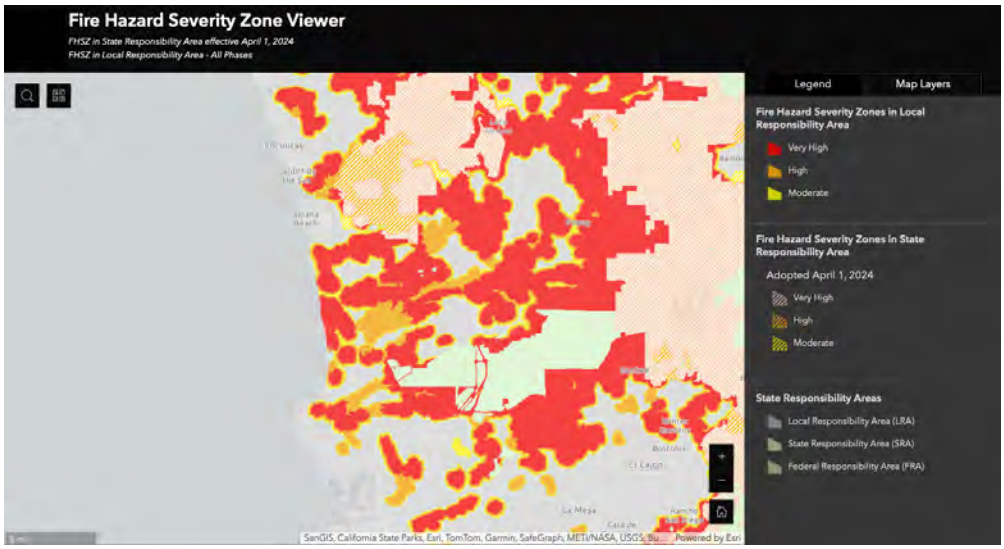
1. The northern portal construction and operation would inflict the **maximum** negative impact on Del Mar, its businesses, the Fairgrounds and residents. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is **certain**.
2. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.
3. The Fairgrounds would also be negatively impacted by the ventilation of concentrated diesel pollution not far from the Fairgrounds.
4. The Fire Department and other First Responders will be severely impeded in trying to reach Del Mar residents in an emergency (fire, health incident, flood, earthquake, etc.) because those services are located north of the construction area for the North Portal and tunnel entrance. Below is the latest Fire Hazard Severity Report just released from the Fire Department showing Del Mar in the highest fire risk zone.



VII. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO DOUBLE TRACKING ON THE BLUFFS

The Northern Yellow Line is far superior to SANDAG Staff's Double-Track-the-Bluffs route. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double-track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the Bluffs and beach at the expense of the public. The almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed our coast for 50 years. **According to SANDAG**, double-tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:"

> **"If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."**

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law *does not preempt* state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023, available at:

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The **Northern Yellow Line** would provide the means for removing the tracks from the Bluffs while inflicting the least adverse consequences to the community and environment.

VIII. CONCLUSION

The Rail Realignment Project Goal is fatally flawed. It should be to avoid adverse effects to the communities while enhancing rail service. SANDAG's selection of study routes demonstrates a clear favoritism of rail stakeholder interests to the exclusion of the interests of the community. Residents have been pleased thus far by the appearance of engagement with the communities, but sorely disappointed in

the implementation of the input of the community most affected. Tunnelling under Del Mar has been widely and strenuously opposed but remains the most prominent alternative in SANDAG's study recommendations. SANDAG has been quick to point to its community outreach but has virtually ignored the results of that outreach to Del Mar, and the public outcry from Del Mar residents. It has also ignored the admonishments of the Coastal Commission by adding double-tracking the bluffs to the study routes.

We ask that SANDAG comply with its obligation to not just reach out to the public regarding the plan to study alternative feasible rail realignment routes in the EIR, but to actually *implement* proposals from the public to study and select a rail realignment that enhances rail service and has the least adverse impact to the communities called on to bear its consequences. As noted above, at the SANDAG Board meeting where its members voted on the staff recommendations for EIR study, Mr. Orso publicly assured the Board and residents who attended, that he was **"committed"** to studying, in the EIR, the **Northern Yellow Line**, a citizen formulated route that has the least adverse impact to the rail hosting community. We look forward to seeing a complete and objective study of the **Northern Yellow Line** in the EIR.

Respectfully submitted,

COALITION FOR SAFER TRAINS,

By:

Angelina Neglia

Cc: SANDAG Board of Directors
SANDAG CEO Mario Orso
SANDAG Realignment Project team
Congressman Mike Levin
Senator Catherine Blakespear
Del Mar City Council

Attachments: COALITION UPDATED NOP SUBMISSION OF NORTHERN YELLOW LINE ROUTE 6.23.25.pdf

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From: Clerk of the Board <clerkoftheboard@sandag.org>
Sent: Tuesday, June 24, 2025 6:07:08 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Fw: Formal Submission Response to the NOP LOSSAN Rail Alignment Project from the "Coalition for Safer Trains"

From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Sunday, June 22, 2025 1:25 PM
To: Clerk of the Board <clerkoftheboard@sandag.org>
Subject: Formal Submission Response to the NOP LOSSAN Rail Alignment Project from the "Coalition for Safer Trains"

Dear Clerk of the Board for SANDAG Projects:

Subject: Formal submission Response to the LOSSAN Rail Alignment Project from the Coalition for Safer Trains:

Please find attached the Formal Submission from the "Coalition for Safer Trains", in Response to the LOSSAN Rail Alignment NOP, June 22nd, 2025. We thank you for your efforts, and the opportunity to work with your team to create an alignment with the least impact to our communities. Please feel free to reach out to us with any questions.

Kind Regards,

Angelina Neglia
Coalition for Safer Trains

Angelina Neglia
Healthcare/Educational Advocate
angie.neglia@gmail.com
(858) 945 8827
CALTASH 2024 Recipient, Advocating for People with Disabilities
2024 Nominee, Senator Blakespear's "Women Who Inspire"

COALITION FOR SAFER TRAINS

June 23, 2025

Dear SANDAG:

Re: Citizens' Comment on Updated May 15, 2025 Notice of Preparation and Submission of Alternative Rail Realignment EIR Study Route: "Northern Yellow Line."

I. PRELIMINARY STATEMENT

The Coalition for Safer Trains ("Coalition") is a grassroots organization of concerned residents who own homes or businesses in the immediate geographic areas of SANDAG's currently proposed study routes for rail realignment, all of which pose substantial adverse impacts to the community.

There is, however, a realignment route that greatly minimizes the adverse impact of realignment to the hosting communities and businesses while enhancing rail service, that has the support of residents. It is shown in this letter and is referred to as the **Northern Yellow Line**. SANDAG's CEO Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings where the Board voted on proposed study routes and later approved the minutes from prior meetings, that he was **"committed"** to study this route in the Environmental Impact Report, citing lack of sufficient time to develop the route as the reason that it was not formally part of the recommended routes by the time of the SANDAG Board voting meeting. We rely on his stated commitment and look forward to the inclusion of the **Northern Yellow Line** in the EIR.

The NOP's stated Project Goal ("to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN corridor") is fatally flawed and short sighted because it prioritizes speed and operations of the rail stakeholders over avoiding adverse impacts to the community. The appropriate Project Goal would be *to avoid and minimize adverse impacts to the communities hosting the realignment while enhancing rail transportation*. In general, the three proposed routes that SANDAG approved for study that are not on the Del Mar Bluffs would force a government take-over of homes by eminent domain or bore a double-track tunnel directly under our homes or run the trains so close to homes so as to destroy the quality of living for the residents and greatly devalue their homes. These routes would also place air-polluting portals proximal to homes, businesses and the coast. The fourth option, the "double-track-the Bluffs" option as well as the mis-named "no-build" option would destroy the Del Mar Bluffs and Del Mar beaches.

The City of Del Mar is the stakeholder most profoundly affected by the realignment, both with respect to the enormous disruption that will be caused by years-long construction and by the drastic consequences of the realignment. The burdens that accompany the benefits from realignment should be shared by stakeholders who are receiving the benefits. The need for realignment has been caused by natural forces, not any action of Del Mar. Because the realignment is designed to benefit several stakeholders - the Fairgrounds (taxpayer funded special

events platform), Solana Beach (retains its station), NCTD, BNSF, AMTRAK, COASTER, SPRINTER and all of San Diego (double-track rail service) - its adverse consequences must not fall solely or disproportionately on Del Mar, and the selection of a route that minimizes community and environmental impacts must be chosen over high speed in a densely populated community.

II. NOP HISTORY AND CITIZEN SUBMISSION OF THE NORTHERN YELLOW LINE FOR EIR STUDY

SANDAG published its first Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") for the Rail Realignment Project on June 4, 2024. The NOP proposed the study of three realignment routes: Route A (a tunnel route around the Fairgrounds), Route B (a Crest Canyon tunnel route under Del Mar residential housing), and Route C (a Camino Del Mar tunnel route under Del Mar's main street).

All three routes presaged severe adverse effects to homes and businesses of the hosting community and transparently favored rail stakeholder interests in hyper-train speed through a densely populated community over avoiding adverse community impacts. In over 1500 public and institutional comments, all three routes received scathing criticism. When new SANDAG executive management stepped in, CEO Mario Orso commissioned a "Value Analysis" which articulated, as a shared project objective, minimizing adverse impacts to the communities surrounding the realignment. Unfortunately, notwithstanding repeated criticism of the Crest Canyon and Camino Del Mar routes during the Value Analysis and prior community outreach meetings, at its conclusion, SANDAG engineers recommended the study of slightly modified versions of those two highly criticized routes borrowed from the original NOP, hoping to maximize speed. SANDAG engineers also recommended an additional route that would avoid portals and tunnels under residences (the San Dieguito Bridge to I-5 route), but which routes the tracks close to homes and businesses and through the protected San Dieguito Lagoon. Finally, SANDAG's staff recommended for study a new route option that would double-track the deteriorating Del Mar Bluffs and will study a so-called "no build" option, which would, despite the name, require perpetual building and shoring of the failing bluffs, costing billions of dollars in funding over decades, continue to block access to the coast, and will destroy Del Mar's beaches. The CA Coastal Commission promptly opposed the two bluff routes.[1]

Finding all five alternatives alarmingly unsatisfactory, citizens met with engineers to formulate an alternative, the **Northern Yellow Line**, a simplified concept that essentially would move SANDAG's San Dieguito Bridge to I-5 alternative route (SANDAG's yellow route) approximately 600 ft. further north. The **Northern Yellow Line** would eliminate: (1) tunneling under neighborhoods; (2) concentrated-pollution spewing portals near the coast, homes or Fairgrounds; (3) costly infrastructure needed to ward off flooding (sea level rise, underground water rising), required by the other routes, (4) eminent domain of homes and businesses; and (5) the danger of road grade crossings (which was the number 1 goal articulated by SANDAG).

The following chart shows the **Northern Yellow Line** superimposed onto SANDAG's staff's May 15, 2025 map shown in its NOP of the four alternative routes:

[1] See: February 27, 2025 letter of Wesley Horn, Senior Environmental Scientist, Energy, Ocean Resources and Federal Consistency Division, California Coastal Commission, to the SANDAG Board of Directors.

Figure 3. Four Project Alternative Alignments

Citizens proposed the Northern Yellow Line route in public comments to SANDAG executive leadership and realignment engineers at a Del Mar City Council meeting and SANDAG Board meetings and in writing to SANDAG board members. At the February 28, 2025 meeting of the SANDAG Board where Board members were scheduled to vote on the route recommendations, after hearing public comment, Board Member Bruce Ehlers specifically questioned why the Northern Yellow Line route proposed by Del Mar citizens was not on the recommended study list. Board members Rebecca Jones, Kevin Shin and Jack Fisher asked questions pertaining to concerns about eminent domain of homes and businesses and tunneling under the entire town of Del Mar. SANDAG CEO Mario Orso responded that he was "committed" to studying the Northern Yellow Line route in the EIR, alluding to insufficient time for his engineers to have pre-studied it to add it to the study recommendations for the vote. Having received Mr. Orso's commitment, the Board moved forward to vote. We citizens therefore anticipate that the EIR *will include* the study of the Northern Yellow Line to the same degree of detail and with the same objectivity accorded the other routes.

III. Coalition submission of the "Northern Yellow Line."

In response to the updated NOP, the Coalition submits for study in the EIR, the **Northern Yellow Line** rail route that would be located north of SANDAG'S San Dieguito Bridge to I-5 alternative (depicted as the "yellow route" on the May 15, 2025 NOP) and connect to Interstate-5. The **Northern Yellow Line** is a modification of SANDAG's yellow line route, and one that meets the stated project goal of maintaining and enhancing rail operation. It also retains the Fairgrounds special events platform and the Solana Beach and Sorrento Valley train stations, removes the tracks off the eroding bluffs, preserves the San Dieguito Lagoon and offers the opportunity to restore the Los

Penasquitos Lagoon. **More importantly, the Northern Yellow Line would not take homes from residents or destroy businesses by eminent domain or cause further damage to beaches, coastal bluffs, lagoons and canyons. This proposed route will minimize negative effects and adverse impacts to neighborhoods, businesses and the environment both during construction (which could last for more than a decade) and for decades after. This route will not interfere with evacuation routes for residents in case of emergencies which include fire, flood and earthquake. Mario Orso has conveyed to the Coalition for Safer Trains, The Northern Yellow Line route could be a few seconds slower due to the curve and lower speed pulling out of the Fairgrounds Event Platform, but they can make this up in other parts of the 351-mile LOSSAN Corridor.**

Northern Yellow Line

The Northern Yellow Line, traveling southward, is described in summary as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the **Northern Yellow Line** bridge would turn east and travel along the southern-most edge of the Fairgrounds property west of Jimmy Durante Boulevard, utilizing a 100-foot easement[2], rising in elevation until it reaches Jimmy Durante Blvd. It then would continue east above Jimmy Durante Blvd on an elevated bridge.

[2] https://www.delmar.ca.us/DocumentCenter/View/9375/Item-13---Living-Levee
On page 10 of 31 - "Place 10-foot wide pedestrian path on top of living levee - within existing 100-foot public easement for new westerly trail connection between Fairgrounds and Coast to Crest Trail"

The bridge then would continue eastward along the southern edge of the Fairgrounds property (just north of the San Dieguito Lagoon) utilizing the empty dirt at the southern edge of the Golf Driving range, (instead of taking resident's homes), until it turns and heads south to cross the lagoon, just west of the I-5. The **Northern Yellow Line** then would continue south tunneling under the I-5, emerging at the knoll south of Carmel Valley Road in San Diego. The **Northern Yellow Line** has many advantages that SANDAG's San Dieguito Bridge to I-5 "yellow line" on the May 15, 2025 NOP and the other study routes lack.

The proposed **Northern Yellow Line** would provide the following advantages.

1. **No negative impact on ANY homes or businesses.**
2. **Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.**
3. **Places no air-polluting portals near homes, near the coast or near the Fairgrounds.**
4. **Bores no tunnels under or near homes.**
5. **Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an easement for which compensation can be paid to the Fairgrounds without displacing families.**
6. **No negative impact on the City of Solana Beach.**
7. **Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.**
8. **Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.**
9. **Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.**
10. **Is expected to cost considerably less than other routes that require tunneling and eminent domain of homes and businesses.**
11. **Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delay.**

IV. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO SANDAG'S PROPOSED SAN DIEGUITO BRIDGE TO I-5 ALIGNMENT

SANDAG's San Dieguito Drive Bridge to I-5 alignment or SANDAG's "Yellow Line Route" shown on the May 15, 2025 NOP has substantial adverse community effects that the **Northern Yellow Line** would avoid:

1. The San Dieguito Drive Bridge to I-5 alignment would adversely impact over 60 homes and businesses (including Del Mar Blueprint, and View Point Brewery) on San Dieguito Drive and Racetrack View Drive because the elevated train would run proximal to homes and businesses. This would result in either eminent domain taking of property or virtual elimination of property value due to proximity of the train to the neighborhood.
2. In contrast, the **Northern Yellow Line** would move the trajectory of the SANDAG Yellow Line Route approximately 600 ft. to the north. The route would utilize a small fraction of the Fairgrounds 370-acre property at its southernmost boundary. Once the route crosses Jimmy Durante Blvd., it would run north of the San Dieguito Lagoon utilizing undeveloped land at the southern edge of the golf driving range.
3. The coast, the City of Del Mar and the Fairgrounds would all benefit from not having air-polluting portals proximal to the coast and residential neighborhoods that are a feature of the Camino Del Mar and the Crest Canyon routes. Instead, the portals would be located in the transportation corridor adjacent to the I-5.
4. The **Northern Yellow Line** is environmentally superior to SANDAG's yellow route because the yellow route travels in the lagoon and the Northern Yellow Line travels north of the Lagoon.

5. It is intuitively and demonstrably obvious that the **Northern Yellow Line** is far superior to SANDAG's San Dieguito Drive Bridge to I-5 alignment which involves serious negative impact to 60 plus residences and businesses. The **Northern Yellow Line** also involves negligible adverse impacts to the Fairgrounds, which benefits from a taxpayer-funded special events platform as part of the realignment.

V. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CAMINO DEL MAR ROUTE

The **Northern Yellow Line** would be far superior to the Camino Del Mar Route because:

1. The portion of the Del Mar community close to the Torrey Pines Road portal option associated with the Camino Del Mar route is densely populated. It includes the 126 condominiums of Del Mar Woods, the 97 apartments of Los Arboles, and numerous single-family homes proximal to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA:
    - **a)** **Air Quality** will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of toxic fumes and pollution from **diesel output** and other concentrated **Greenhouse Gas Emissions** spewed from the ventilation systems close to their homes.
    - **b)** Virtually continuous **Noise** of the ventilation systems and both **Noise and Vibration** of continuous freight and passenger trains descending and traveling right under their homes.
    - **c)** Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - **d)** **Weight Issues under the porous Del Mar hillside for Freight and Military Trains** carrying heavy freight such as Abrams 1 Tanks which weigh over **70 tons each**. The military carries fully loaded trains longer than the city of Del Mar carrying these tanks and support vehicles. We know SANDAG is taking boring samples throughout the hillside, but due to the porous nature of the Torrey Sandstone these boring samples would need to be literally taken every 10 feet from north to south in the hillside and at different depths. Based on research done by the Coalition for Safer Trains and other sources, there are no other tunnels built carrying freight or military trains under porous Torrey Sandstone.
    - **e)** Continuous **Noise** of trains entering and exiting the portal.
    - **f)** Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[3]
    - **g)** The risks of carrying **Hazardous Waste** transported under their homes.

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[3] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children
https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

h) The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2022 alone).

i) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.

2. In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    a) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades. Homes left next to any portals or located above a tunnel in a shallow area, will have to disclose this information if they try to sell their home. The long-term effects of this destruction will lower the resident's largest asset, their home, and also prove challenging to retain or obtain house insurance plans.
    b) The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to the Torrey Pines Beach.
    c) Elimination of pedestrian and bicycle paths during construction.
    d) The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    e) Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    f) Delivery of **Emergency Public Services** will be impeded or blocked.
    g) Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    h) The loss of **additional square meters of environmentally sensitive lagoon acreage** with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon. This increased infrastructure will impact tidal patterns bringing more sand into the lagoon, impacting water flow, wildlife and the need for more sand dredging, costing millions of dollars.

3. The Camino Del Mar route would tunnel under Del Mar's main street. As a result, the amount of disruption and destruction to Del Mar businesses in the construction process would be **continuous and extreme**. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city.
4. A double- track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    a) Virtually continuous **Noise and Vibration** of continuous freight and passenger trains traveling underground next to their homes
    b) Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans and anxiety.
    c) The risks of carrying **Hazardous Waste** near their homes
    d) The **Hazard** risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).

e) Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
f) Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
g) Potential hydrology issues (sinkholes, drainage etc.) with constructing the tunnel horizontally at the bottom of the porous hillside which would reroute water flowing down the hill.

VI. THE NORTHERN YELLOW LINE IS FAR SUPERIOR TO THE CREST CANYON ROUTE

The Crest Canyon alternative would cause all of the same ill-effects listed above as the Camino Del Mar route, only more directly and on more homes.

1. The northern portal construction and operation would inflict the **maximum** negative impact on Del Mar, its businesses, the Fairgrounds and residents. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is **certain**.
2. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.
3. The Fairgrounds would also be negatively impacted by the ventilation of concentrated diesel pollution not far from the Fairgrounds.
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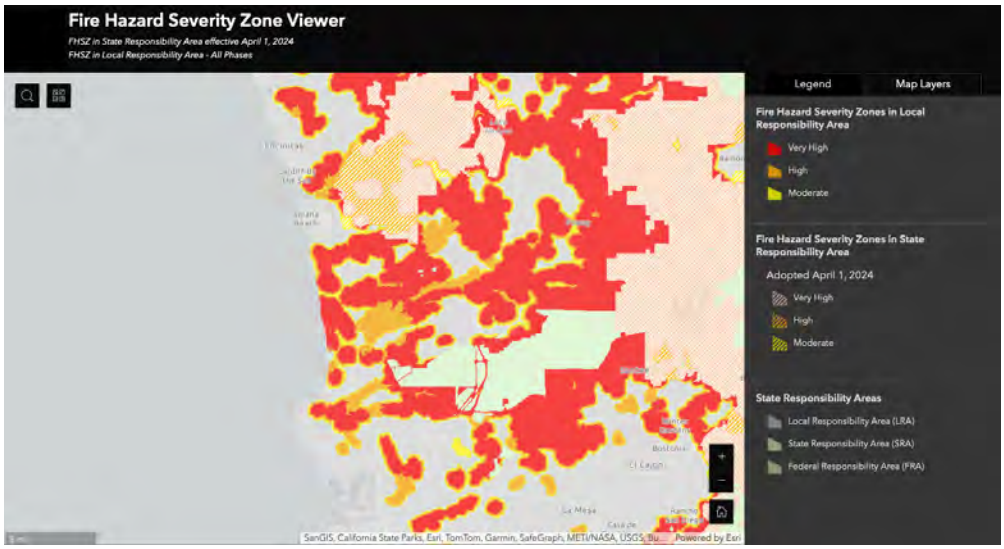

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Respectfully submitted,

COALITION FOR SAFER TRAINS,

By:

Angelina Neglia

Cc: SANDAG Board of Directors
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Attachments: A Neglia NOP June 2025 response.pdf

From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Friday, June 27, 2025 10:19:40 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Submission from Angelina Neglia, Coalition for Safer Trains "SDLRR Project NOP"

Please find attached a second submission response from the Coalition for Safer Trains for the LOSSAN Rail alignment.

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June 27th, 2025

To the LOSSAN Rail NOP Project Team,

Please find further formal comments from the Coalition for Safer Trains, in response to the SANDAG NOP for the LOSSAN Rail Project. We would like these questions and comments addressed in writing.

1. **Weight and Vibration of Freight trains carrying military cargo and hazardous waste and chemicals under a densely populated town:**

Heavy Freight and Military Trains: After exhaustive research there is no known freight train tunnel carrying an entire train of Abrams 1 tanks that runs through Torrey Sandstone in a densely populated town. After more research there is no new tunnel construction to put a high-speed passenger train, or tunnels under a densely populated town. There is no tunnel construction under Torrey Sandstone.

Torrey Sandstone is a type of Eocene-age sandstone found along coastal cliffs in San Diego County, especially near Torrey Pines State Natural Reserve. It appears in coastal bluffs and canyons. It's relatively fragile and porous, not ideal for tunnel stability unless heavily reinforced.

2. **Freight train Infrastructure in San Diego Area**:

The Coaster and Feight rail line (operated by BNSF for freight) runs along the coast. Each Abrams tank weighs about 70 tons. A trainload of them can be transported by military flatcars (well cars or heavy-duty flatcars), usually via dedicated military rail corridors. These routes are almost always routed through low density industrial areas, not through tunnels under populated cities, for both security and safety reasons.

Conclusion: There is no freight tunnel know to run through Torrey Sandstone in a densely populated area that carries a full train of Abrams tanks. Most heavy military rail traffic avoids densely populated tunnel routes due to weight, clearance, and risk factors. No Abrams tank trains can use this route through Del Mar either on the bluffs or through a tunnel under Del mar, due to the fragile and highly erosion-prone concern about landslides and bluff collapses.

Military trains carrying Abrams 1 tanks (up to 70 tons per tank) as in other parts of the Country, use a heavy freight line which goes inland with secure staging yards and access to military bases. Marin Corps Base Bamp Pendleton and Marine Corps Air Station Miramar, utilize logistics hubs in Barstow or San Bernadino. There is no strategic reason to move tanks through a coastal tourist corridor. If a tunnel is ever built through or under Del Mar, it would not be rated for transporting dozens of 70-ton tanks due to the eroding cliffs, porous fragile nature of the hillside, and visible to the public. These heavy military trains need to use inland routes with proper clearance, security, space and structural integrity.

This equipment should be utilizing the I-15 Corridor to do north south, then use connectors to go east and west to get to the military bases. Take the threat and risk away from the communities instead of placing it under them. This should be seriously considered in the Regional Plan as well.

3. **Boring Locations:**

We see the Boring locations signs being places around Del Mar, now, and wonder why there are no Boring Signs going up for the Northern Yellow Line as committed to by SANDAG? During our presentations at the SANDAG Board meetings, Scoping

Meetings, and separate meetings with SANDAG (Mario and Mario) the Project committed to include the Northern Yellow Line to the same depth as the other NOP rail alignments in the EIR study. Please provide the status of when those boring signs will be placed for the Northern Yellow Line, so it can be studied as agreed to the same extent and depth as the other routes in the NOP.

4. **Vibration Studies Comments and Questions:**

Here are observations and questions regarding the vibration survey study, dated July 9 2021, where Helix Environmental Planning Inc. conducted a review of the Del Mar Bluffs Stabilization Project #5 Vibration Survey technical memorandum provided by Entech Consulting Group for the Del Mar Bluffs Stabilization 5 Project. The Coalition for Safer Trains would like to understand the findings regarding the deficiencies of the vibration study that SANDAG/NCTD performed at the end of 11th and the end of Sea Cliff immediately east of the bluff above the tracks below.

Based on these findings we are concerned with all studies done regarding noise, vibration, boring and environmental, so please respond to these questions so we can increase transparency and trust. Please supply all studies done during the July 2025 LOSSAN Rail Alignment NOP EIR period to the Coalition for Safer Trains for our review to increase trust and transparency.

We want to make sure that vibration studies, done by SANDAG and their consultants in the Del Mar Hillside, bluffs and lagoons for this LOSSAN Rail Alignment Project (NOP dated, July 2025) are well done, transparent, thorough, and accurate.

Please respond to our comments and questions;

1. **The data for location 2 is incomplete and inconsistent. The freight trains are missing entirely at location 2.** Location 2 is 11th St.

2. **The Long HZ is noted as >100 for all trains which is an unlikely measurement.** **Was the instrument not working for this measurement?**

3. **The data times for locations 1 and 2 both end in 8's and 3's indicated 15 sec intervals. Location 3 timepoints end in 7's and 2's also indicating 15 sec intervals. It is highly unlikely that locations 1 and 2 have identical 15 second intervals through each minute and that location 3 is offset by just one second.** There is an artifact here. What is the source?

4. **The measurements for the freight trains are just two trains at location 1 and location 2. Both were north bound. Usually, an experiment measures at least in triplicate and at separate times (dates).** This experiment measured just two freight trains on one night.

5. **We know from experience that the freight trains on the bluff vary significantly. Some are very heavy and have significantly more vibration than the other trains. Some are empty and make noise but no vibration. Empty trains usually are going south but sometimes north.** One night of measurement with two trains is a highly incomplete sample for freight. How heavy and how long were the two freight trains?

6. **Why do the different locations have missing trains that were observed at other locations?** For example, the Amtrak train just after midnight is missing from some location data and present in other location data.

7. **The maps show the wrong site for location 3.** Location 3 is alley south of 6th St.

8. **Why are there outlier measurements for all freight trains?** How are outliers handled in the data processing to calculate PPV and Lv?

9. **With the 15 sec interval, Coaster trains and Amtrak trains may be measured at begins or ends of pass-bys. They take about 20 seconds to pass. So, two successive 15 sec timestamps may or may not hit the peak of**

the train. The long measurement interval compared to pass-by time will create under-sampling and lead to artificially low observed values. Another artifact.

10. **Why do the freight trains have highly variable measurement profile shapes from one location to the next on the graphs with Hz on the x-axis? Is this due to topography? What is the source of the change in Hz profile for the same train from site to site?**

5. **Safety of the Tracks:**
   SANDAG's goals for this project is safety of the community, eliminate road grade crossings, health of the community, eliminate toxic pollution and speed.
   See the chart below which is all of the Incidents and Deaths that have happened on the tracks since 2015 in our communities, due to road grade crossings. The tracks go through the middle of all the communities, from Oceanside going south. Now that SANDAG will double track them, this increases the risk for our communities. One death is too many.

   If SANDAG transitions and move the tracks (in phases) at Oceanside (which is right next to the I-5) over to the I-5 to utilize the transportation corridor south then these deaths and incidents are preventable. By eliminating these road grade crossings in our communities, this will bring safety to the community.

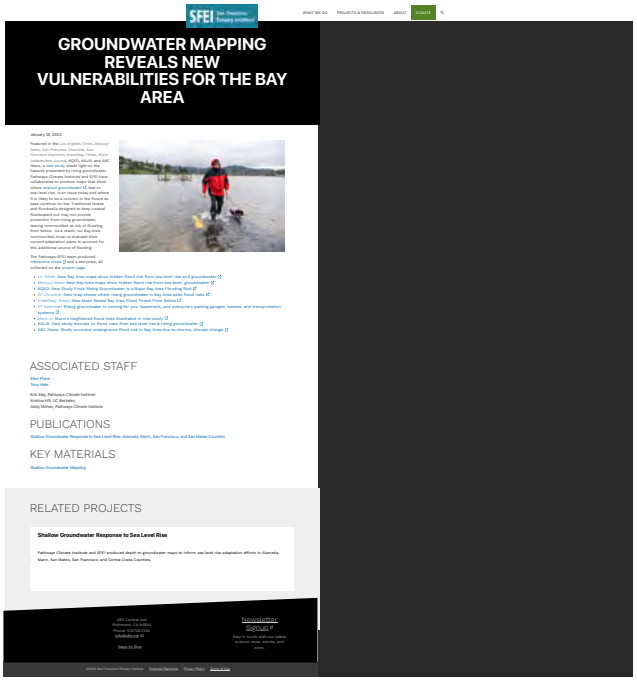
   By moving the tracks out of the communities and down the I-5 for passenger and I-15 for freight and Sprinter:
   - **a.** Move the risk of derailment, explosion, out of the communities
   - **b.** Move the toxic pollution out of the communities
   - **c.** Be able to transition and utilize Electric and even Autonomous options for rail's future. (Due to the fragile topography of the Torrey Sandstone bluffs and hillside and dense community, it isn't an option to build bigger

tunnels to allow for electrification. This infrastructure which will last 100 years for diesel trains is a dinosaur. This is not a prudent way to spend billions of dollars for future infrastructure.

6. **Floodplain and Under Groundwater:**

   The SANDAG Rail alignments (Bluffs, Camino Del Mar, and Crest Canyon) all would travel south off the new Trestle Bridge running along the tracks on a berm into the North Portal. This entire area is in the floodplain, and is also subject to groundwater rising due to increased tide patters and increased storm activity and water run-off. As the portal and tracks will be in the floodplain, the portal will require flood gates, the Cut and Cover Tunnel will be sitting in a U Structure which will disrupt and redirect water running down the hillside.

   The infrastructure sitting in the floodplain will require more dollars for maintenance over 100 years which should be added to any cost benefit analysis. This is also the same for the Bluff option. Band-aiding and shoring up the bluffs for 100 years (which will destroy their integrity and weaken them) to run the tracks on the eroding bluffs is not a viable option, given we cannot stop the erosion or climate changing or water draining down the hillside through the bluffs which also contributes to the erosion.



7. As part of a real cohesive transit plan for future generations should connect commuters all over San Diego SANDAG. SANDAG should consider more east west connectors for rail. Are residents in Fallbrook, really going to drive all the way to the coast to take the train south to San Diego to work? We know the I-15, I-5 and I-805 are all clogged starting at 2pm every day in every direction. Adding a lane can only take us so far.

Section	Location	Date of Incident
MP 112.5 - 114.5,	Mission Rd./N. Pacific St. (MP 114.5)(027574T),	2/4/15
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	3/5/15
MP 240.1 - 245.0,	Coast Blvd. (244.09)(026834F),	3/12/15
MP 260.1 - 267.7,	San Clemente Canyon Creek Bridge 3 (MP 259.5),	5/9/15
BNSF,		6/10/15
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	8/12/15
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	9/29/15
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	10/5/15
MP 225.1 - 230.0,	CP Carl (MP 229.4),	11/12/15
MP 114.6 - 116.5,	Marcos St. Ped (MP 115.9)(934296G),	2/9/16

MP 230.1 - 235.0,	Palomar Airport Rd. Overpass Bridge (MP 232.2),	5/12/16
MP 230.1 - 235.0,	Batiquitos Lagoon Bridge (MP 234.8),	6/2/16
MP 118.5 - 119.2,	Rancheros Dr. (MP 118.8)(027581D),	6/4/16
MP 235.1 - 240.0,	D St. (MP 237.87)(026829J),	9/5/16
MP 240.1 - 245.0,	Del Mar Bluffs (MP 244.2-245.5),	9/24/16
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	10/29/16
MP 240.1 - 245.0,	Coast Blvd. (244.09)(026834F),	11/29/16
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	1/26/17
MP 225.1 - 230.0,	CP Longboard (MP 228.4),	2/14/17
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	2/22/17
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	3/15/17
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	3/31/17
MP 225.1 - 230.0,	CP Carl (MP 229.4),	4/3/17
MP 116.6 - 118.4,	Bike Trail Crossing #1 (MP 116.70)(943873B) ,	5/16/17
MP 225.1 - 230.0,	Oceanside Blvd. (MP 227.25),	5/28/17
MP 225.1 - 230.0,	Wisconsin Ave. (MP 226.84),	5/31/17
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	6/22/17
MP 225.1 - 230.0,	CP East Brook (MP 225.3),	6/25/17
MP 240.1 - 245.0,	Coast Blvd. (244.09)(026834F),	7/7/17
MP 235.1 - 240.0,	CP Swami (MP 238.04),	8/8/17
MP 240.1 - 245.0,	Del Mar Bluffs (MP 244.2-245.5),	11/15/17
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	11/19/17
C2 Station - Carlsbad Village,		12/17/17
MP 245.1 - 250.0,	CP Torrey (MP 247.83),	2/11/18
MP 230.1 - 235.0,	Agua Hedionda Bridge (MP 230.6),	3/19/18
MP 240.1 - 245.0,	Coast Blvd. (244.09)(026834F),	4/8/18
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	4/24/18
MP 245.1 - 250.0,	CP Pines (MP 249.8),	5/5/18
MP 235.1 - 240.0,	CP Swami (MP 238.04),	5/10/18
MP 235.1 - 240.0,	E St. (MP 237.96)(026830D),	5/15/18
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	5/23/18
MP 260.1 - 267.7,	CP Convair (MP 265.19),	6/1/18
MP 240.1 - 245.0,	Lomas Santa Fe Overpass Bridge (MP 241.9),	6/4/18
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	7/13/18
MP 225.1 - 230.0,	Oceanside Harbor Dr. Overpass Bridge (MP 225.2),	7/22/18
C3 Station - Poinsettia,		7/23/18
MP 260.1 - 267.7,	Hawthorne Street (MP 266.93)(026866L),	7/26/18

MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	8/15/18
MP 235.1 - 240.0,	CP Swami (MP 238.04),	12/29/18
MP 240.1 - 245.0,	Del Mar Bluffs (MP 244.2-245.5),	1/18/19
C2 Station - Carlsbad Village,		2/2/19
MP 230.1 - 235.0,	Tamarack Ave. (MP 230.09)(026822L),	2/27/19
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	3/21/19
MP 225.1 - 230.0,	Oceanside Blvd. (MP 227.25),	4/16/19
MP 225.1 - 230.0,	Wisconsin Ave. (MP 226.84),	4/18/19
MP 235.1 - 240.0,	CP Swami (MP 238.04),	4/23/19
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	5/18/19
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	5/29/19
MP 225.1 - 230.0,	Carlsbad Village Dr. (MP 229.29)(026821E),	5/30/19
MP 225.1 - 230.0,	Grand Ave. (MP 229.2)(026820X),	9/26/19
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	10/30/19
MP 260.1 - 267.7,	Taylor Street (MP 264.25)(026852D),	11/14/19
MP 207.4 - 210.0,	County Line (MP 207.4),	11/22/19
MP 225.1 - 230.0,	Mission Ave. (MP 226.22)(027062B),	12/8/19
MP 235.1 - 240.0,	CP Swami (MP 238.04),	12/12/19
MP 260.1 - 267.7,	CP Cudahy (MP 262.25),	1/2/20
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	2/18/20
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	2/29/20
MP 255.1 - 260.0,	Rose Creek (MP 258.0)(967110H),	5/30/20
MP 225.1 - 230.0,	Grand Ave. (MP 229.2)(026820X),	6/15/20
MP 207.4 - 210.0,	County Line (MP 207.4),	9/18/20
C7 Station - Old Town,		10/2/20
C2 Station - Carlsbad Village,		11/19/20
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	1/10/21
MP 260.1 - 267.7,	Noell Street (MP 265.35)(026856F),	1/28/21
MP 235.1 - 240.0,	Chesterfield Dr. (MP 239.86)(026849V),	2/15/21
MP 119.3 - 120.4,	N. Andreason Dr. (MP 120.4)(027593X),	2/17/21
C7 Station - Old Town,		4/15/21
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	6/4/21
MP 225.1 - 230.0,	Oceanside Blvd. (MP 227.25),	7/17/21
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	7/18/21
MP 225.1 - 230.0,	Carlsbad Village Dr. (MP 229.29)(026821E),	7/26/21
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	10/20/21
MP 225.1 - 230.0,	Carlsbad Village Dr. (MP 229.29)(026821E),	11/15/21
MP 260.1 - 267.7,	Sea World Dr/Tecolote Rd. Overpass Bridge (MP 263.1),	11/19/21

MP 240.1 - 245.0,	Del Mar Bluffs (MP 244.2-245.5),	12/6/21
C7 Station - Old Town,		1/1/22
MP 225.1 - 230.0,	Surfrider Way (MP 225.94)(026813M),	1/18/22
MP 225.1 - 230.0,	Loma Alta Creek Bridge (MP 227.7),	2/18/22
MP 235.1 - 240.0,	La Costa Ave. Overpass Bridge (MP 235.1),	4/8/22
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	4/30/22
MP 245.1 - 250.0,	Sorrento Valley Blvd. (MP 249.07)(026838H),	5/22/22
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	5/22/22
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	6/9/22
MP 109.3 - 111.4 ,	Main St. (MP 109.3)(925051S),	6/9/22
MP 119.3 - 120.4,	Enterprise St. (MP 119.9)(027590C),	1/18/23
MP 230.1 - 235.0,	Tamarack Ave. (MP 230.09)(026822L),	4/2/23
MP 230.1 - 235.0,	Agua Hedionda Bridge (MP 230.6),	4/11/23
MP 255.1 - 260.0,	CP Morena (MP 260.51),	4/24/23
MP 260.1 - 267.7,	Clairemont Ave. Overpass Bridge (MP 261.7),	5/24/23
MP 260.1 - 267.7,	Taylor Street (MP 264.25)(026852D),	7/11/23
MP 235.1 - 240.0,	Chesterfield Dr. (MP 239.86)(026849V),	7/13/23
MP 260.1 - 267.7,		8/16/23
MP 260.1 - 267.7,	Washington Street (MP 265.57)(026857M),	9/3/23
MP 260.1 - 267.7,		9/4/23
MP 260.1 - 267.7,	Grape Street (MP 267.0)(026867T),	9/13/23
MP 260.1 - 267.7,	Noell Street (MP 265.35)(026856F),	11/29/23
MP 245.1 - 250.0,	CP Torrey (MP 247.83),	1/11/24
MP 260.1 - 267.7,	Sassafras Street (MP 266.08)(026859B),	1/11/24
MP 235.1 - 240.0,		1/13/24
C2 Station - Carlsbad Village,		1/15/24
MP 210.1 - 219.9,		2/3/24
MP 109.3 - 111.4 ,	Main St. (MP 109.3)(925051S),	2/4/24
MP 235.1 - 240.0,	Chesterfield Dr. (MP 239.86)(026849V),	2/10/24
MP 109.3 - 111.4 ,	Main St. (MP 109.3)(925051S),	2/29/24
MP 225.1 - 230.0,		3/5/24
MP 245.1 - 250.0,	McGonigle Rd. Underpass Bridge (MP 246.0),	3/17/24
MP 235.1 - 240.0,	Encinitas Blvd. Underpass Bridge (MP 237.7),	4/10/24
MP 260.1 - 267.7,	Taylor Street (MP 264.25)(026852D),	4/18/24
MP 235.1 - 240.0,		5/4/24
BNSF,		5/8/24
MP 230.1 - 235.0,		6/7/24
MP 260.1 - 267.7,		6/8/24
MP 245.1 - 250.0,	Sorrento Valley Blvd. (MP 249.07)(026838H),	6/14/24

MP 230.1 - 235.0,		6/15/24
MP 225.1 - 230.0,	Carlsbad Blvd. Overpass Bridge (MP 228.9),	8/12/24
MP 235.1 - 240.0,		9/2/24
MP 225.1 - 230.0,	Cassidy St. (MP 227.98)(026818W),	9/14/24
MP 260.1 - 267.7,		9/20/24
MP 245.1 - 250.0,		10/23/24
MP 225.1 - 230.0,	Carlsbad Village Dr. (MP 229.29)(026821E),	10/27/24
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	11/5/24
MP 225.1 - 230.0,	Mission Ave. (MP 226.22)(027062B),	12/15/24
MP 260.1 - 267.7,	CP Cudahy (MP 262.25),	12/20/24
MP 225.1 - 230.0,		1/14/25
MP 260.1 - 267.7,	Palm Street (MP 266.38)(026861C),	2/13/25
MP 260.1 - 267.7,	Palm Street (MP 266.38)(026861C),	2/25/25
MP 119.3 - 120.4,	Enterprise St. (MP 119.9)(027590C),	3/4/25
MP 225.1 - 230.0,	CP Shell (MP 225.9),	3/12/25
MP 260.1 - 267.7,	Taylor Street (MP 264.25)(026852D),	3/17/25
MP 240.1 - 245.0,	Hwy 101 Overpass Bridge (MP 243.7),	4/16/25
MP 235.1 - 240.0,	Leucadia Blvd. (MP 236.49)(026827V),	5/14/25

In Summary, to meet the goals SANDAG has set forth; Safety of the Community, Reduce Toxic pollutions, reduce impact on the community regarding Eminent Domain resident's homes and business, and eliminate road grade crossing, and increase resiliency of the track, SANDAG needs to seriously look at the Northern Yellow Line as the alignment proposed by the Coalition for Safer Trains meets these needs and goals.

Thank you for your consideration,

Angelina Neglia

Angelina Neglia

Attachments: June 30th SANDAG Ltr.pdf

From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Monday, June 30, 2025 3:54:50 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>; Mario Orso <Mario.Orso@SANDAG.org>; Maria Rodriguez Molina <maria.rodriguezmolina@sandag.org>; Keith Greer <Keith.Greer@sandag.org>; Danny Veeh <Danny.Veeh@sandag.org>; Sheila Garcia <Sheila.Garcia@sandag.org>
Cc: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Coalition for Safer Trains "SDLRR Project NOP"

Hello to to the LOSSAN Rail Alignment Project Team,

Please find attached our third submission letter to be included in the comments for the rail project. We appreciate the work you are doing, and please don't hesitate to contact us with questions. We have drone footage of the Northern Yellow Line we can share with you as well…

Kind Regards,
Angelina
Coalition for Safer Trains

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June 29th, 2025

Dear SANDAG LOSSAN Project Team,

Please find comments from the Coalition for Safer Trains, regarding the 2025 SANDAG NOP for the LOSSAN Rail Project, specifically in Del Mar.

In our meetings with Mario, Maria, and in discussions at the SANDAG Board Meetings, it was publicly stated more than a couple of times that SANDAG is committed to studying The Northern Yellow Line to the same depth as the other routes in the EIR Process.

1. We are seeing the Boring signs going up around Del Mar over the last couple of weeks, and have repeatedly asked your project team for a status for when the Boring signs will go up for the Northern Yellow Line? It has been two weeks, and we would like that date, to make sure it is studied to the same depth as publicly agreed.
2. When you compare the routes, the Northern Yellow line would be less susceptible to sea level rise since it is further from the coast.
3. The Northern Yellow Line would eliminate costly infrastructure needed to ward off flooding (sea level rise, underground water rising), required by the other routes.
4. The Northern Yellow Line eliminates the expense of tunnels under private property added infrastructure otherwise needed for routes below sea level rise.
5. The Northern Yellow Line is expected to cost considerably less than other routes that require MORE tunneling, litigation and delays associated with the eminent domain of homes and businesses.

6. The other routes all run under, through and near densely populated neighborhoods in Del Mar. The North Portal at Camino Del Mar and Jimmy Durante, for the Crest Canyon and Camino Del Mar routes will disproportionately destroy the north end of Del Mar for over a decade, taking homes and businesses by eminent domain and crippling tourism and access to businesses in Del Mar. The city's small businesses will not be able to last over a decade of construction and hardly any business. The city and businesses will go bankrupt as they rely on the income. This construction of the Cut and Cover Tunnel, and portal at this location will virtually cut off Del Mar's evacuation route north for fire, earthquake, landslide, Tsunami and for first responders. Detouring traffic around the construction on one lane is not enough. We have all seen the traffic going north through Del Mar when the traffic is bad on the I-5 (which is very day) trying to go north. The 101 is not a viable high traffic or emergency route.
7. The portion of the Del Mar Community very close to the Torrey Pines Road Portal option associated with the Camino Del Mar route is densely populated. It includes 126 condominiums of DMW (Del Mar Woods), the 97 apartments of Los Arboles, and numerous single-family homes proximal to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road, as well as businesses on the north and south sides of the Western end of Carmel Valley Road. DMW and Los Arboles communities have underground parking.
8. It concerns the City of Del Mar, The Coalition for Safer Trains, the residents and business owners about SANDAG undertaking the engineering of tunneling under an entire town. We understand you will use a tunnelling company, but as we have stated in our previous submissions, there are NO tunnels that have been constructed in fragile Torrey Sandstone under an entire town. We are concerned about the lack of experience or limited experience with construction of tunnels for freight trains in sandstone rather than granite. We know the tunneling company would want the job no matter what, so the project can boast of shovel ready jobs!
9. Refer to the Big Bertha TBM machine which was a massive tunnel boring machine that dug the Alaskan Way Viaduct replacement tunnel under Seattle. Even with all of the engineering project work done, on December 6th, 2013, work was halted approximately 1,083 feet (330m) into the planned 9,270 foot long (2,270 M) route because of an unexpected impediment. Even with all of the pre-engineering done by the Project Team, it struck a steel pipe and well casings used to measure ground water in 2002 Alaskan Way Viaduct. Then upon further investigation revealed that portions of the main bearing seal system were damaged, causing the bearing to overheat. Over the next two years a massive recovery pit was dug from the surface in order to access and lift the machine's cutterhead for repair and partial replacement in 2015. Bertha resumed tunnel boring on December 22, 2015 but was stopped again in early January 2016, as a sink hole formed

and concerns for public safety. Digging briefly resumed on February 23, but was halted again for maintenance and inspections before resuming full operations on April 29. The cost overruns are estimated at $223 M stemming from the two-year delay. It took over 86 tons of reinforcing plates to get Bertha ready to bore again. Seattle's beleaguered boring behemoth clawed its way into daylight, leaving a 1.7-mile tunnel behind it. Bertha was stuck under Seattle for 4 years. It sat motionless under Seattle for two years. The machine was 326 feet long and weighed 6,700 short tons (6,100t). The machine itself cost $80 Million and was owned by Seattle Tunnel Partners (STP), the project contractors. This would have been a reputable tunnel builder, yet they were unaware of the pipes. This tunnel is about the same length of bored tunnel SANDAG is proposing. Del Mar cannot take this risk.
Source: https://www.seattlebusinessmag.com/policy-regulations/who-killed-bertha-why-seattle-tunnel-disaster-isnt-what-it-seems-and-why-wsdot-making/#:~:text=Sometime%20during%20the%20midnight%20shift,it%20high%20above%20the%20ground.

10. If the tunnel Portal is below Carmel Valley Road, as is proposed in the reissued NOP, there won't be loss of aesthetics going from north to south. The Portal will not be visible from this perspective. The visual impact will be from the south driving into Del Mar from TP State Beach looking North.
11. This route will result in the loss of much of the aesthetic benefits of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to Torrey Pines Beach. Why destroy our beautiful coastline and town, when there is a less impactful route, the Northern Yellow Line.
12. The risk of the bored tunnel for the CDM route being so close to the slope of Anderson Canyon, a slope that has previously collapsed, potentially impacting CDM above (homes).

As SANDAG moves forward with the LOSSAN Rail Realignment Project, please include the Northern Yellow Line, as publicly committed to. If SANDAG is truly representing the tax paying people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in the transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line is the most acceptable route for the double track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment is in consideration. This could be considered the first phase of moving the rail

down the I-5 Transportation Corridor from Oceanside to downtown San Diego. Also, in the route cost benefit analysis, please include both present and future dollar estimates, and cost per rider.

Sincerely,

Angelina Neglia
Coalition for Safer Trains

Cc: Senator Catherine Blakespear
Diana Kutlow, Senior District Representative, Office of Senator Catherine Blakespear
Alex Davis, LOSSAN Principal Consultant to Senator Blakespear
Jim Desmond, San Diego County Board of Supervisors
Janelle Kellman, Democratic Candidate for California Lieutenant Governor in 2026
Congressman Mike Levin
Kyle Krahel-Frolander, Deputy Chief of Staff & District Director for Congressman Levin

Attachments: June 30th SANDAG Ltr.pdf

From: Angelina Neglia <angie.neglia@gmail.com>
Sent: Monday, June 30, 2025 8:55 AM
To: LOSSAN Comments <LOSSANcomments@sandag.org>; Mario Orso <Mario.Orso@SANDAG.org>; Maria Rodriguez Molina <maria.rodriguezmolina@sandag.org>; Keith Greer <Keith.Greer@sandag.org>; Danny Veeh <Danny.Veeh@sandag.org>; Sheila Garcia <Sheila.Garcia@sandag.org>
Cc: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Coalition for Safer Trains "SDLRR Project NOP"

Hello to to the LOSSAN Rail Alignment Project Team,

Please find attached our third submission letter to be included in the comments for the rail project. We appreciate the work you are doing, and please don't hesitate to contact us with questions. We have drone footage of the Northern Yellow Line we can share with you as well...

Kind Regards,
Angelina
Coalition for Safer Trains

Angelina Neglia
Healthcare/Educational Advocate
angie.neglia@gmail.com
(858) 945 8827
CALTASH 2024 Recipient, Advocating for People with Disabilities
2024 Nominee, Senator Blakespear's "Women Who Inspire"

www.safertrain.org

Angelina Neglia

1955 Seaview Avenue

Del Mar, CA. 92014

Angie.neglia@gmail.com

(858) 945 8827

June 29th, 2025

Dear SANDAG LOSSAN Project Team,

Please find comments from the Coalition for Safer Trains, regarding the 2025 SANDAG NOP for the LOSSAN Rail Project, specifically in Del Mar.

In our meetings with Mario, Maria, and in discussions at the SANDAG Board Meetings, it was publicly stated more than a couple of times that SANDAG is committed to studying The Northern Yellow Line to the same depth as the other routes in the EIR Process.

1. We are seeing the Boring signs going up around Del Mar over the last couple of weeks, and have repeatedly asked your project team for a status for when the Boring signs will go up for the Northern Yellow Line? It has been two weeks, and we would like that date, to make sure it is studied to the same depth as publicly agreed.
2. When you compare the routes, the Northern Yellow line would be less susceptible to sea level rise since it is further from the coast.
3. The Northern Yellow Line would eliminate costly infrastructure needed to ward off flooding (sea level rise, underground water rising), required by the other routes.
4. The Northern Yellow Line eliminates the expense of tunnels under private property added infrastructure otherwise needed for routes below sea level rise.
5. The Northern Yellow Line is expected to cost considerably less than other routes that require MORE tunneling, litigation and delays associated with the eminent domain of homes and businesses.

6. The other routes all run under, through and near densely populated neighborhoods in Del Mar. The North Portal at Camino Del Mar and Jimmy Durante, for the Crest Canyon and Camino Del Mar routes will disproportionately destroy the north end of Del Mar for over a decade, taking homes and businesses by eminent domain and crippling tourism and access to businesses in Del Mar. The city's small businesses will not be able to last over a decade of construction and hardly any business. The city and businesses will go bankrupt as they rely on the income. This construction of the Cut and Cover Tunnel, and portal at this location will virtually cut off Del Mar's evacuation route north for fire, earthquake, landslide, Tsunami and for first responders. Detouring traffic around the construction on one lane is not enough. We have all seen the traffic going north through Del Mar when the traffic is bad on the I-5 (which is very day) trying to go north. The 101 is not a viable high traffic or emergency route.
7. The portion of the Del Mar Community very close to the Torrey Pines Road Portal option associated with the Camino Del Mar route is densely populated. It includes 126 condominiums of DMW (Del Mar Woods), the 97 apartments of Los Arboles, and numerous single-family homes proximal to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road, as well as businesses on the north and south sides of the Western end of Carmel Valley Road. DMW and Los Arboles communities have underground parking.
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and concerns for public safety. Digging briefly resumed on February 23, but was halted again for maintenance and inspections before resuming full operations on April 29. The cost overruns are estimated at $223 M stemming from the two-year delay. It took over 86 tons of reinforcing plates to get Bertha ready to bore again. Seattle's beleaguered boring behemoth clawed its way into daylight, leaving a 1.7-mile tunnel behind it. Bertha was stuck under Seattle for 4 years. It sat motionless under Seattle for two years. The machine was 326 feet long and weighed 6,700 short tons (6,100t). The machine itself cost $80 Million and was owned by Seattle Tunnel Partners (STP), the project contractors. This would have been a reputable tunnel builder, yet they were unaware of the pipes. This tunnel is about the same length of bored tunnel SANDAG is proposing. Del Mar cannot take this risk.
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Sincerely,

Angelina Neglia
Coalition for Safer Trains

Cc: Senator Catherine Blakespear
Diana Kutlow, Senior District Representative, Office of Senator Catherine Blakespear
Alex Davis, LOSSAN Principal Consultant to Senator Blakespear
Jim Desmond, San Diego County Board of Supervisors
Janelle Kellman, Democratic Candidate for California Lieutenant Governor in 2026
Congressman Mike Levin
Kyle Krahel-Frolander, Deputy Chief of Staff & District Director for Congressman Levin

Attachments: image001.png
image002.png
image003.png
image004.png

From: Marco Gonzalez <marco@coastlawgroup.com>
Sent: Friday, June 20, 2025 7:29:39 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Mike Seiber <mseiber@kitchell.com>
Subject: LOSSAN Rail Realignment Updated Notice of Preparation of Draft EIR - Comments of Watermark DM, L.P.

Re: LOSSAN Rail Realignment Updated Notice of Preparation of Draft EIR

Coast Law Group LLP represents Watermark DM, L.P. owner of the 2.37- acre property at the Southeast corner of Jimmy Durante Blvd. and San Dieguito Drive in the City of Del Mar (APNs:
299-100-47-00, 299-100-48-00). My client's property is the site of the fully entitled, but as-of-yet unbuilt, Watermark Apartment Project. The project includes construction of a new 4-story 132,894 sq.ft. multi-family residential development totaling 50 units (10 of which are deed-restricted affordable rentals). Entitlements efforts, including both City of Del Mar and Coastal Commission approvals, took more than ten years to complete, and final grading and building permit applications are in process with permits expected from the City of Del Mar later this summer or early fall.

The Watermark Project, with its deed-restricted low and very low-income affordable units, is critical to the City's compliance with its Regional Housing Needs Assessment allocation.

I am writing to express serious concerns regarding the potential environmental and community impacts associated with the **"San Dieguito Bridge to I-5 Alternative Alignment"** which would bring the rail corridor in close proximity to the intersection of Jimmy Durante Boulevard and San Dieguito Drive, where the Watermark Project is proposed. The proposed alignment raises a number of important concerns, including:

1. Noise, Vibration, and Air Quality Impacts
The construction and long-term operation of a rail corridor near a dense residential development will likely result in increased noise levels, groundborne vibration, and diminished air quality. These impacts could severely affect the health, well-being, and quality of life for future residents of the Watermark Project, as well as nearby homes.

2. Traffic and Access Disruptions
Jimmy Durante Boulevard is a critical access route for Del Mar residents, particularly during peak hours and special events at the Fairgrounds. Construction staging or long-term infrastructure near this corridor could create bottlenecks or restrict access, negatively affecting emergency response times, commute patterns, and local businesses.

3. Visual and Aesthetic Impacts
Rail infrastructure introduced near the San Dieguito Lagoon and adjacent residential zones would alter the scenic and natural character of the area. According to SANDAG's information, bridges and tracks just east of Jimmy Durante (and the roundabout) **will exceed 35' above existing grade, and increase to over 56'** above existing grade as the rail continues east. These heights will obliterate views and view corridors in direct conflict with the City of Del Mar's view policies. Scenic views, whether of the Pacific Ocean, nearby lagoons, canyons, the community and its landscapes and urban forest character, or other scenic vistas, produce a variety of significant and tangible benefits for residents, property owners and visitors. Scenic views provide inspiring vistas, encourage distinct and creative architecture, and contribute to the economic value and comfortable enjoyment of real property within the City of Del Mar

4. Environmental Sensitivity and Lagoon Proximity
The project area sits adjacent to the **San Dieguito River Park and Lagoon ecosystem**, which provides essential habitat for sensitive species and supports ongoing restoration efforts. Increased construction activity and permanent infrastructure could disrupt these sensitive habitats through runoff, erosion, or habitat fragmentation.

5. Land Use Compatibility
Placing major infrastructure so close to a medium-density residential project is a poor land use fit. Introducing a major rail corridor at this intersection is incompatible with the City of Del Mar's long-standing planning objectives, which aim to preserve its unique residential character while supporting smart, sustainable growth.

6. Alternative places Watermark Project in Jeopardy
The Watermark Project has taken **more than a decade** to secure approvals from the City of Del Mar and CA Coastal Commission. No new multifamily project has been developed in Del Mar for 40+ years. There is significant value in these entitlements which have **an expiration date in 18 months**. Consideration of the "yellow line route" would jeopardize entitlements by creating **significant uncertainty to the project's underwriting** making it extremely difficult to secure financing (because of the inability to

forecast accurate rents, impact of losing protected views, reduced rents during disruptions, etc.).

Further, the Project was designed to benefit from: (i) protected lagoon and ocean views; (ii) quiet, oversized outdoor living spaces with views; (iii) a clubhouse (with indoor/outdoor fitness and BBQ areas) oriented towards ocean and lagoon views; and (iv) high-end architecture designed with timeless, agrarian-inspired themes found in Del Mar's North Commercial area. The proposed overhead yellow line route would radically alter the residential experience, and thus the value, of the Watermark Project. Simply put, project rental rates will be significantly reduced given the change to the character of the entire project.

Request for Consideration

We respectfully urge SANDAG to:

- **Be very clear,** of all the staff-recommended alignments, this "yellow line route" is the **most costly of all alternatives** considered;
- **Consider Rail Operation and Maintenance Challenges** with this alignment, including: (i) curves proposed at the south end of the future San Dieguito Bridge; (ii) maintenance for the aerial structure, which would be approximately one mile in length and up to 55 feet in height; and (iii) increased travel times;
- **Fully disclose negative impacts** to existing businesses along San Dieguito Road and Jimmy Durante Blvd given the change of character of this area, modified access, and visibility concerns;
- **Extensively evaluate the cumulative and site-specific impacts** of this alternative on nearby housing, including the proposed Watermark project;
- **Prioritize those alternatives** that either avoid the San Dieguito Drive corridor altogether or tunnel deeper to reduce surface-level disruption;
- **Include focused outreach** to nearby property owners, developers, and tenants who may be directly affected by this alignment; and,
- Ensure the **Draft EIR includes a full assessment** of localized traffic, safety, and environmental risks specific to this intersection and the surrounding natural habitats.

Please do not hesitate to contact me with any questions.

-Marco Gonzalez
Attorney for Watermark DM, L.P.

Marco A. Gonzalez
(he/him)
Managing Partner
Phone: (760) 942-8505 x102
Direct Line: (760) 942-9870
Coast Law Group LLP
1140 S Coast Hwy. 101
Encinitas, CA 92024

Attachments: image001.png
DMTC Letter to SANDAG Re LOSSAN Comments 063025.pdf

From: Chris Jaczko <chrisj@dmtc.com>
Sent: Monday, June 30, 2025 11:44:02 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Josh Rubinstein <josh@dmtc.com>; Chris Jaczko <chrisj@dmtc.com>; Lucy Myers <lucy@dmtc.com>
Subject: LOSSAN SDLRR Project Comments (Del Mar Thoroughbred Club)

Dear LOSSAN SDLRR Project Team:

On behalf of the Del Mar Thoroughbred Club, please see attached letter regarding the above subject.

Regards,
Chris Jaczko for Josh Rubinstein

Chris Jaczko
General Counsel and Corporate Secretary
Del Mar Thoroughbred Club
2260 Jimmy Durante Blvd. Del Mar, CA 92014-0700
T: 858.792.4290 | E: chrisj@dmtc.com

July 18 - Sept 7, 2025
Oct 30 - Nov 30, 2025
Home of the 2025 Breeders' Cup

Josh Rubinstein
President

June 30, 2025

VIA EMAIL – *lossancorridor@sandag.org*

SANDAG
ATTN: LOSSAN Comments
1011 Union Street, Suite 400
San Diego, CA 92101

Re: Updated Notice of Preparation (NOP) Comments for the Preparation of a Draft Environmental Impact Report (EIR) for the San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project

Dear Sir/Madam:

Del Mar Thoroughbred Club (DMTC) wishes to take this opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project).

DMTC is the operator of live thoroughbred horse racing at the Del Mar Fairgrounds pursuant to the 2011 Del Mar Race Track Operating Agreement, as amended (the "Operating Agreement"), entered into by and between DMTC and the State Race Track Leasing Commission (SRTLC) acting on behalf of the 22nd District Agricultural Association (22nd DAA).

DMTC operates two annual live thoroughbred horse race meets at the Del Mar Fairgrounds, both of which are highly successful and profitable for the 22nd DAA. DMTC's summer race meet typically consists of eight to nine weeks of racing between mid-July and early-September and its fall race meet consists of four weeks of racing in November. DMTC has operated live thoroughbred horse racing at the Del Mar Fairgrounds under operating agreements with the STRLC and the 22nd DAA since 1970 and is considered one of the preeminent operators of live horse racing in the United States and throughout the world. Del Mar is likewise considered one of the horse racing industry's crown jewels, both in terms of the success of DMTC's operations and Del Mar's record as one of the safest race tracks in the United States.

DMTC's reputation for excellence has led to Del Mar being selected to host the Breeders' Cup World Championships in 2017, 2021, 2024 and again this year for an unprecedented second consecutive year. The Breeders' Cup brings racing's top race horses from all over the world and draws an international crowd to Del Mar. It has been estimated that each Breeders' Cup held at Del Mar generates as much as $300 million in positive economic impact to San Diego and the surrounding area.

DMTC recognizes the regional impact and need for the LOSSAN SDLRR project as well as the imperative to identify and consider reasonable alternatives that are feasible for the future of the LOSSAN Corridor in San Diego County. However, we are concerned about any potential alternative that negatively impacts any property integral to the events and activities at the Del Mar Fairgrounds, including horse racing.

As we understand it, there has been some mention of a "more northerly design concept" which would impact the Fairgrounds. We join in the comments filed by the 22nd DAA objecting to any discussion of this "more northerly design concept" and we urge SANDAG to remove the "more northerly design concept" from any further consideration.

It is our understanding that any discussion about a "more northerly design concept" has been ambiguous at best. That flaw makes understanding the actual impacts of any such concept impossible. We nonetheless believe that any concept that impacts the operations and activities at the Fairgrounds necessarily impacts and, indeed, jeopardizes our horse racing operations.

As an initial matter, DMTC has reviewed the comments to the NOP provided by the 22nd DAA as well as the analysis the 22nd DAA requested to be undertaken as part of any EIR SANDAG conducts related to the proposed Project. DMTC agrees with and adopts all those comments and requests for analysis, including, without limitation, the requests for analysis regarding:

- Air Quality
- Biology
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards
- Hydrology and Water Quality
- Land Use
- Noise
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Cumulative Impacts

P.O. Box 700 • Del Mar, CA 92014-0700 • 858-755-1141
e: josh@dmtc.com • http://www.delmarracing.com

Further, as we commented last year with respect to what was then called the Project's Alternative A, we have several concerns about any concept that would entail construction and operation of any route in, near, or through the Fairgrounds. DMTC's specific concerns raised last year apply equally now. They include the following issues:

Noise

DMTC is concerned about the significant and detrimental impacts related to noise during both the construction and operation phases of the Project.

The need for a thorough evaluation of the effect that noise and vibration from not only construction but also from operation of the proposed Project on race horses at Del Mar cannot be overstated. It is well known that horses are a prey species that have evolved to rapidly react to potential danger. (*See e.g.*, Riva MG, Dai F, Huhtinen M, Minero M, Barbieri S, Dalla Costa E. *The Impact of Noise Anxiety on Behavior and Welfare of Horses from UK and US Owner's Perspectiv*e. ANIMALS (BASEL). 2022 May 21;12(10):1319. Doi: 10.3390/ani12101319. PMID: 35625165; PMCID: PMC9138043) Horses can perceive noise as potential danger and they are known to exhibit several anxiety behaviors as a result of noise. Such behaviors include, among others, sweating, trembling and escape attempts, which may cause severe accidents for the horse and those around them. Even without accidents noise can significantly impact horse welfare. Such impacts should be evaluated in the draft EIR to ensure that the proposed Project does not adversely impact the welfare of the horse population at Del Mar.

Land Use

DMTC is concerned that the "more northerly design concept" or any alternative impacting the Fairgrounds will conflict with DMTC's use of the Fairgrounds for horse racing. Any proposed concept must thoroughly analyze and take into account the impacts related to DMTC's thoroughbred horse racing meets, which are conducted twice each year at the Fairgrounds. And any analysis must include mitigation efforts to ensure that impact on the operations are minimized.

Any concept that would entail shutting down all operations at the Del Mar Fairgrounds during part of the construction phase of the Project, including horse racing, will have a devastating effect on DMTC and will jeopardize the survival of horse racing in San Diego as well as the entire racing industry in California.

DMTC's horse racing operations, together with the San Diego County Fair, constitute the primary sources of revenue for the 22nd DAA and the Del Mar Fairgrounds. Over the past 10 years, for example, DMTC's summer and fall race meets have generated net revenues for the 22nd DAA totaling $392 million, including $9.3 million in race-meet related net revenues in 2023. Since its inception in 1970, DMTC has contributed nearly $1 billion to local and state governments, dozens of charitable organizations and equine research. Shutting down DMTC's horse racing operations for any substantial period of time will not only cause DMTC irreparable economic harm but will also harm the 22nd DAA and the local and state governments as a result of losing DMTC's revenue contributions. A shutdown lasting seven to ten years would be catastrophic.

Horse racing at Del Mar provides a substantial number of jobs, which would be jeopardized as a result of disrupting our operations. DMTC employs approximately 3,600 people each year during its summer race meets alone. There are additional workers not employed by DMTC, but who are integral to conducting horse racing meets at Del Mar, such as trainers, jockeys, and backstretch personnel. All these people would be out of work during the period DMTC could not operate due to the Fairgrounds being closed for construction of the proposed Project. The direct economic impact on these people if racing operations were shut down for any period of time as well as the corresponding impact on the surrounding communities would be devastating.

Horse racing at Del Mar also provides significant economic benefits to the local economy. The race meets at Del Mar draw tens of thousands of fans from all over the world and boost local restaurants and hotels, among other businesses. One example of the impact racing at Del Mar is that figures have shown the typical North County San Diego hotel occupancy rate is 69.8%. That figure goes up to 86.7% during DMTC's summer meet and many local hotels see their occupancy rate exceed 90%. DMTC's fall meet likewise provides a boost to the local economy during what is normally a slower tourist season, and in years where DMTC and Del Mar have hosted the Breeders' Cup (i.e., 2017, 2021, 2024 and this coming fall), the San Diego economy has benefited significantly with people traveling from all over the world to enjoy the most prestigious multi-day event in horse racing. Indeed, it is estimated that this year's Breeders' Cup at Del Mar will result in as much as $300 million in economic benefits to the San Diego area each year.

Shutting down racing operations at the Del Mar Fairgrounds will also have a devastating effect on horse racing in California. The California horse racing industry heavily depends on continued racing operations at Del Mar in order for the industry to survive. Del Mar is one of the two largest race meets in the state of California. To lose Del Mar's economic contribution would seriously jeopardize the health and viability of the horse racing industry in California.

Because concepts such as the "more northerly design concept" are ambiguous and ill-defined, DMTC has had no opportunity to analyze the possible effects that, once construction is completed, operation of trains and the attendant effects of noise and vibration will have on its revenues. However, assuming DMTC's operations were to survive any period in which it is shut down during the construction phase, DMTC is concerned that operation of trains under or through any portion of the Fairgrounds property will negatively impact its operations as a result of the adverse effect noise and vibration from any proposed train operations will have on the welfare of race horses at Del Mar. As discussed above, it is known that the perception of potential danger for horses in general – *and especially thoroughbred horses* – negatively impacts their safety and welfare. DMTC does not know whether vibrations from train operations would have a similarly negative effect on race horses; however, it seems reasonable to assume that vibrations from train operations under or through any part of the Fairgrounds will negatively impact the safety and welfare of the horses.

DMTC's horse racing operations are integral to the ongoing success and viability of the Del Mar Fairgrounds as well as the entire horse racing industry in California. Causing DMTC's operations to shut down for any period will have a devastating and rippling effect beyond just DMTC's loss of revenue. So too will any detrimental impact on horses from noise and vibration from train operations once the Project

is completed. Accordingly, as noted above, we urge SANDAG to remove the "more northerly design concept" from any further consideration. The economic effects on racing at Del Mar that will result from any concept that impacts the Fairgrounds are too significant and could very well signal the death knell for horse racing in San Diego, if not the entire state of California. At a bare minimum, we urge SANDAG to evaluate all the economic issues affecting horse racing at Del Mar in any draft EIR.

* * * *

DMTC appreciates the opportunity to comment on the NOP for the SDLRR Project. If you have any questions about the comments contained in this letter, please do not hesitate to contact Josh Rubinstein at 858.794.1154 or via email at josh@dmtc.com.

Respectfully,

Josh Rubinstein,
President

cc: 22nd DAA

Attachments: DMWoods comment letter to amended SANDAG NOP 6-26-25 final.pdf

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From: K Lare <karen.lare@yahoo.com>
Sent: Thursday, June 26, 2025 5:33 PM
To: LOSSANcorridor <lossancorridor@sandag.org>
Cc: Senator Blakespear <senator.blakespear@outreach.senate.ca.gov>; Representative Mike Levin <ca49ml.outreach@mail.house.gov>; executivestaff@coastal.ca.gov; Dan Quirk <dquirk@delmar.ca.us>; Tracy Martinez <tmartinezrn@lapbypass.com>; Terry Gaasterland <gaasterland@gmail.com>; John Spelich <jwspelich@gmail.com>; Ron Lopezi <rlopezi@menas.com>; Cfauquet <cfauquet@gmail.com>; Linda Judd <lindadearlinda@gmail.com>; Darcy Stamler <darcy.stamler@gmail.com>; Theodore Polansky <theodorempolansky@gmail.com>; Brianna Becker <briannabecker@gmail.com>; Christian Fritze <cfritze@gmail.com>
Subject: Del Mar Woods Homeowners' Association Comments on Notice of Preparation of Draft Environmental Impact Report on Track Relocation ("NOP").

Please see attached response letter to SANDAG's May 15, 2025 NOP.

Karen Lare
President, Del Mar Woods HOA

To: **SANDAG**

At: **LOSSANcorridor@SANDAG.org**

From: **DEL MAR WOODS HOMEOWNERS' ASSOCIATION**

Date: **June 29, 2025**

Re: **SDLRR PROJECT NOP**

Del Mar Woods Homeowners' Association Comments on Notice of Preparation of Draft Environmental Impact Report on Track Relocation ("NOP").

Dear LOSSAN SANDAG PROJECT DEVELOPMENT TEAM:

The Del Mar Woods Homeowner's Association submits the following comments to the May 15, 2025, Notice of Preparation of the Draft Environmental Impact Report for the San Diego Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project) located in the cities of Del Mar, Solana Beach and San Diego, California ("NOP").

I. INTRODUCTION

Thank you for the opportunity to comment on the updated NOP for the relocation of the train tracks off the crumbling bluffs of Del Mar. This comment is submitted on behalf of the 126 families and other owner-members of Del Mar Woods Homeowners Association ("DMW"), whose physical address is 265 Stratford Court Del Mar and whose mailing address is c/o Ron Lopezi, Menas HOA Management at 7592 Metropolitan Drive Suite 401 San Diego, CA 92108. DMW reserves the right to comment further on any revised NOP, draft EIR or EIS or final EIR or EIS. DMW thanks members of the SANDAG project team for the recent outreach at the Fairgrounds and for being responsive to questions sent via e-mail to the project team by Karen Lare, the President of its HOA. We refer in our letter to the proposed routes as outlined on the included amended NOP diagram which includes both the Northern Yellow Line Route as well as the South Yellow Line Route.

Del Mar Woods Condominium Community Location

DMW is a 126-unit condominium and townhome community located in the southwest corner of Del Mar, CA. Approximately 60 condominium homes are located between the southmost portion of Camino Del Mar, in Del Mar, looking west, and the southmost portion of Stratford Court in Del Mar, and approximately 60 units are located between the southmost portion of Stratford Court and the Del Mar Bluffs where the trains currently operate. To the direct north of the DMW HOA complex is the multi-family apartment complex of Los Arboles consisting of 97 rental housing units. East of DMW are homes along the east side of Camino Del Mar. South of DMW are more homes and a quiet reserved wooded area owned by Torrey Pacific Corporation. As a result of the multi-family housing in the southwest portion of Del Mar, the area is densely populated. The multi-family units were built in the 1970's and many of the residents therein are elderly but there are also families with young children.

Figure 3. Four Project Alternative Alignments

II. PRELIMINARY STATEMENT ON NOP OF May 15, 2025

In a review of the updated NOP, the HOA was disappointed to see that the placement of the portal areas were not changed significantly from the previous NOP, and in fact despite the extensive time spent on the value analysis study, the proposed routes did not change significantly either. Of the five routes listed only three routes would relocate the trains off the bluff (despite it being the stated objective of the $300M grant being used to do the current study, while the remaining two would have it remain on the bluffs, an idea that has been rejected by the California Coastal Commission multiple times and in fact, the need to relocate the train tracks off of the bluff was called out to SANDAG by the Coastal Commission in their approvals of both of the DMB #4 and DMB#5 bluff stabilization projects.

The NOP calls out the need to decrease travel time on the train trip from Oceanside to San Diego as one of the key objectives. The HOA has spent time studying all routes and finds that the damages and negative impacts caused to the Del Mar business owners, residents and visitors by the Purple, Blue, Yellow and Green Line Routes far outweigh any increase gained by these routes over the citizen proposed Northern Yellow Line Route. The use of eminent domain and the need to tear up the town for extended periods of

construction will create an adversarial relationship between SANDAG/NCTD/BNSF/Amtrak and the community of Del Mar which includes its annual visitors, residents, business owners and homeowners.

Members of the HOA Board have attended and spoken at several of the SANDAG Board meetings and were pleased that Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings, that he was "committed" to study the Northern Yellow Line route in the Environmental Impact Report even though it is shown only in the footnotes of the document, citing lack of sufficient time to develop the route as the reason that it was not a formal part of the recommended routes. We believe Mr. Orso will be true to his words and that in fact, this alternative route will be included as a route in the EIR study for final consideration. The HOA Board appreciates that Mr. Orso has taken the time, along with his team, to listen to the community and that the senior team seems to understand the impact the community will feel with any of the other four routes (omitting the no build route).

Specific to Del Mar Woods HOA, the path of the Purple Line Route along Camino Del Mar does not truly follow Camino Del Mar and in fact takes a turn as it approaches 4th street and goes directly under Los Arboles, a four-story apartment building, home to people of all ages and income levels, and under the two-story and three-story buildings of Del Mar Woods. The NOP shows that the train route then goes under the homes to the south of Del Mar Woods and out of a portal a few hundred meters beyond the property. The train depth under Del Mar Woods is shallow given the potential risks of train derailment and subsequent explosion from the flammable materials transported on the freight and military cars.

III. COMMENTS ON THE SOUTH PORTALS

In our review of the documents provided, there is still insufficient information in the NOP to comment **fully** on the Portal Options (or on the NOP Route Options). For example, as to portals, while there is additional information and maps, the NOP lacks critical information on the exact path of the route regarding specific location, width, height of portal, or the width, depth underground and height of the tunnel, the size and location of ventilators, the location, acreage, size of ventilation related buildings referenced in SANDAG's 2023 Tunnel Analysis Report ("2023 SANDAG Report"), noise and vibration levels of construction and operation of the trains, staging area of construction or duration of construction. **Nonetheless, there is sufficient information for DMW to make initial comments.**

The South Portal Options are as follows:

Two south portal locations have been identified depending on the track alignment. The portal locations are as follows:

Torrey Pines Road Portal

This proposed portal would be located near the intersection of Carmel Valley Road and North Torrey Pines Road. The portal infrastructure would cross underneath Carmel Valley Road and potentially extend into residential and commercial properties in Del Mar.

DMW strongly objects to the "Torrey Pines Road" south portal option. The Torrey Pines Road portal option would be located near the intersection of Carmel Valley Road and Torrey Pines Road, which is at the

southern tip of Camino Del Mar and only a few hundred meters from Del Mar Woods and many other homes and businesses. A Project Objective is to **"Minimize impacts in the surrounding communities during and after construction."** This objective is of particular importance to Del Mar residents in light of the fact that while all of San Diego is said to benefit from the rail line, it is the Community of Del Mar that is being compelled to disproportionately, and almost exclusively, shoulder the burden of the realignment. The very least that SANDAG can do is to select or create portals and a route that minimizes the negative impacts to Del Mar and its residents.

Other cities benefit from rail service, but no other city is affected by the choice of the realignment route and the portals as is Del Mar (the City of San Diego would be slightly impacted by the alternate choice of the I-5 Knoll option). The selection of the Torrey Pines Road Portal would maximize negative impact to our community. Some of the reasons, among others are:

- The portion of the Del Mar community that is very close to the Torrey Pines Road portal option is densely populated. It includes the 126-condominiums of DMW, the 97 apartments of Los Arboles, and numerous single-family homes close to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA (p.9 of the NOP):
    - Air Quality will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of fumes and pollution from diesel output and other concentrated Greenhouse Gas Emissions spewed from the ventilation systems close to their homes.
    - Virtually continuous Noise of the ventilation systems and both Noise and Vibration of continuous freight and passenger trains descending and traveling right under their homes.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Continuous **Noise** of trains entering and exiting the portal.
    - Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[1]
    - The risks of carrying **Hazardous Waste** under their homes.

[1] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

    - The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
- In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    - The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to Torrey Pines State Beach.
    - Elimination of pedestrian and bicycle paths during construction.
    - The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    - Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    - The delivery of **Emergency Public Services** will be impeded or blocked.
    - Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    - All of the detriments to Del Mar's residents discussed above.
    - The loss of additional square meters of environmentally sensitive lagoon acreage with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon.

I-5 Knoll Portal

In contrast, the construction of the alternate I-5 Knoll portal would have none of the above effects. Thus, of the few study options for the South Portal offered by SANDAG in the NOP, **the I-5 Knoll is by far the better alternative with the lesser negative impacts to the community.**

IV. COMMENTS ON THE NORTH PORTAL OPTIONS

The North Portal options in the updated NOP are as follows:

Under Jimmy Durante Boulevard Portal

This proposed portal would be located north of the intersection of Camino Del Mar and Jimmy Durante Boulevard. The portal's infrastructure would cross underneath Jimmy Durante Boulevard, which would be raised. **The portal structures would potentially extend into commercial and residential properties in Del Mar.**

I-5 Racetrack View Portal

This proposed portal would be west of the I-5 Freeway close to homes located south of the fairgrounds along Racetrack View Drive. The route would be elevated along the protected San Dieguito Lagoon right along the nesting area for the Western Snowy Plover and other native species (some endangered) which was built at great expense with the restoration of the Lagoon. This route will cause issues for wildlife and untold issues for the thirty plus homes close to that portal.

The Jimmy Durante Boulevard option ("JDB") is unacceptable. **The portal construction and operation would inflict the maximum negative impact on Del Mar, its businesses and residents**. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is not "potential," it is certain. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.

The Racetrack View Portal Option is a challenge in many ways as noted above. It is located very close to the San Dieguito Lagoon, a protected wetlands, that underwent a major restoration that began in 2006 and Phase II was recently completed in 2024. This location will dramatically impact both homes and the lagoon. While it is going to move the construction further from the City center there is no entrance to this route without going through the main intersection that supports all traffic for the racetrack and fairgrounds in and out of Del Mar. This impact will be felt by both residents and visitors, and it will dramatically impact evacuation routes with heavy equipment and trucks.

V. DEL MAR WOODS' COMMENTS ON THE NOP STUDY ROUTES

Purple Line, Blue Line and South Yellow Line Routes

For many of the same reasons Del Mar Woods Homeowners' Association objects to the Torrey Pines Rd. south portal, it objects to the Purple, Blue, and South Yellow Routes.

- Regarding the Purple Line Route, which tunnels under Camino Del Mar, the amount of disruption and destruction to Del Mar businesses in the construction process would be continuous and extreme. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city. A double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on residents' homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.

    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Accelerated bluff erosion as the vibrations from the tunnel through the sandstone will cause additional cracks in the earth allowing water penetration and erosion to occur.
- Regarding the Blue Line Route, a portal right into people's homes and at an elevation to allow noise to carry across the entire area will cause irreparable harm to many. The double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of the portal and over the tunnel will be:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to and under their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.
    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.

Green Line Route

The addition of a double-tracked bluff route was not a welcome addition to the updated NOP in our view. We understand and appreciate the staff's desire to include a non-tunnel option however it does not pass even a rudimentary feasibility test.

The purpose of the study of the proposed routes is to move the tracks off the crumbling sandstone bluff not to study ways to add additional tracks to a fragile environment. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double- track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the bluffs and beach at the expense of the public. The

almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed the California coast for 50 years. According to SANDAG, double tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:" According to the Coastal Commission "If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law does not preempt state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023.

This option also requires the use of eminent domain to take private property so that the eroded thin crumbling bluffs can be expanded to the east.

Northern Yellow Line Route

The Northern Yellow Line Route is the only one that utilizes the non-populated areas of this beachside community and public lands. It allows the route to be built with the lowest impact on residents and the least impact on businesses. It would allow businesses to remain open during construction and limits the impacts to private homes by routing the train along public lands where gaining the necessary right of way would be much simpler and less expensive.

With consideration given to maintaining the horse racing and fair schedules and to strategically planning how to do the construction staging in such ways as to minimize impact to fairground operations, this route is far superior to any of the other routes in the NOP. The impact on residents in Del Mar and San Diego would be far less and it would also limit the traffic flow disruptions for residents of all of the beach communities who use the routes through Del Mar for commuting to work or school or for access to restaurants and businesses.

This route would also dramatically limit the number of lawsuits that SANDAG and NCTD will face over eminent domain and the purchasing of land access rights and would head off the foreseeable class action suits that will be brought to compensate for generations of adverse health effects if any of the other routes are selected.

In short it has the following advantages:

1. No negative impact on ANY homes or businesses.
2. Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.
3. Places no air-polluting portals near homes, near the coast or near the Fairgrounds.
4. Bores no tunnels under or near homes.
5. Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an
   easement for which compensation can be paid to the Fairgrounds without displacing families.
6. No negative impact on the City of Solana Beach.
7. Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.
8. Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.
9. Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.
10. It is expected to cost considerably less than other routes that require tunneling right under homes and eminent domain of homes and businesses.
11. Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delays.

IV. COMMENTS ON SANDAG'S RESPONSIBILITY TO DO A "NO PROJECT" ANALYSIS AND TO HAVE A COST/BENEFIT ANALYSIS PREPARED.

As part of its draft EIR, SANDAG must do a "no project" analysis. In addition, the SANDAG Board, in fulfillment of its duty of reasonable business prudence, must have an independent cost/benefit analysis prepared.

"No Project"

CEQA requires SANDAG engineers to do a "no project" analysis as an alternative. In this case, since continuing bluff instability mandates that the trains must stop operating on the bluffs, removing the tracks must proceed. If, however, after SANDAG does a cost/benefit analysis, it is determined to move forward with relocating the tracks as opposed to finding 21st Century ways to move freight and people, then the "no project" analysis really means "not this project" and would require SANDAG engineers to go back to the drawing boards.

The inescapable fact is that implementing either the Purple Line Route, Blue Line Route, South Yellow Line Route or Double Track Green Route together with the Torrey Pines Road south portal and the JDB portal or Racetrack View Portal, would destroy Del Mar, its culture, property values and economy, and is too high a price to pay in pursuit of a form of transportation that does not fit the needs of the area. **The Northern Yellow Line Route** is the only current study route that circumvents homes and businesses and does not require the use of eminent domain at least affords Del Mar a path to survive the assault of realignment, **is the only acceptable alternative.**

V. Issues Specific to Del Mar Woods

These issues for Del Mar Woods remain the same as in our earlier comment letter on the previous NOP because the most impactful route was not significantly changed. The route chosen to study (Purple Line Route) still does not make the turn to follow Camino Del Mar but instead goes directly under part of the HOA. As a 126-unit condominium and townhouse complex built in the early 1970's, Del Mar Woods was not built to withstand the types of vibrations and shaking that will come with a loaded freight train or military transport train rumbling underneath it. With the location of the complex so close to the portal for the Purple Line Route, the depth of the tunnel underneath the complex will hardly be deep enough to protect the homes and their walls and foundations from damage. As we understand from discussions with your team, the portal openings must start high enough to account for sea level rise and can only proceed down at the maximum 2% grade. Your updated NOP documents show a depth of around 100 to 120 feet below the buildings. A quick investigation says that sandstone will allow vibrations to reach these buildings on a normal day, and any type of explosion would be catastrophic.

The buildings it will go under (as shown in the updated NOP maps) are three story buildings housing families and many older residents. The path also goes under the underground car park.

While these buildings have been retrofitted recently (2018) as per California code, that code did not contemplate loaded rail cars travelling under the three-story buildings or cement underground garages. Consideration must be given to the route plan impacting this large condominium complex and your engineers must take into consideration the building materials and techniques used at that time they were built. Stresses on buildings from vibration and the human health impacts are very real.

We have requested that your project team study the soil in this specific area as part of its geological work.

Del Mar Woods objects to selection of the Purple Line Route and urges the project team to consider the impact on not only the train (speed, duration of tunnel, costs, etc.) but the impact on the quality of life for residents and the structural impacts to real property and the impact on the price of many of the owner's largest (or only) asset.

VI. Additions needed to the NOP

- Vibrational impact studies specific to the materials used in 1970 construction of homes and garages. Specifically pertaining to three story buildings and underground parking.

- Circulation during construction for densely populated areas with limited ingress and egress options both for emergency services as well as daily access
- Impacts on housing prices before, during and after construction
- Funding of a separate account to pay for on-going damage (if the Purple Route is selected) for repairs to cracked foundations and underground cement parking garages due to shaking and vibrations
- Worst case scenarios from an explosive incident in a shallow tunnel under a three-story building
- Studies of potential health risks as noted earlier in this letter
- Study of an alternative route that directly follows Camino Del Mar with its slight curves versus the straight-line route depicted today – a one second difference in time is worth preservation of homes and residents' health

Conclusion

The residents of Del Mar Woods are supportive of the work SANDAG is doing to move the railroad tracks off the eroding sandstone bluffs but it believes that SANDAG has in its current NOP only one realistic alternative which will serve the purpose of track relocation and preserve the lives and the way of life for the Del Mar Woods owners and residents. **This is the Northern Yellow Line Route.**

Many comments have been made in SANDAG meetings urging the Board to take a longer view and find a long-term solution to move the tracks not only off the Del Mar Bluffs but out of all of the densely populated coastal towns and put them along the I-5 transportation corridor. That route however, is not an option in the current NOP. We urge SANDAG staff and Board to reconsider this option during the EIR process.

Thank you for your consideration.

Very truly yours,

Karen Lare

President, Del Mar Woods Homeowners Association, Del Mar, California.

Respond to: Karen.Lare@Yahoo.com

Cc: Del Mar Woods Board of Directors

Office of U.S. Congressman Mike Levin

Office of Senator Catherine Blakespear

California Coastal Commission: Attention Dr. Katherine Hucklebridge

Del Mar City Council

Attachments: Los Arboles apts comment letter to amended SANDAG NOP 6-26-25 final.pdf

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From: Jennifer A <athensjennifer@gmail.com>
Sent: Monday, June 30, 2025 5:57 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Los Arboles Apartments response

See attached comments.

--

Jennifer Athens
(619) 606-4505
Los Arboles Apartments
858-481-9585

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Del Mar | CA 92014
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To: **SANDAG**

At: **LOSSANcorridor@SANDAG.org**

From: **Los arboles Apartments**

Date: **June 28, 2025**

Re: **SDLRR PROJECT NOP**

Los Arboles Apartments Comments on Notice of Preparation of Draft Environmental Impact Report on Track Relocation ("NOP").

Dear LOSSAN SANDAG PROJECT DEVELOPMENT TEAM:

Los Arboles apartments submits the following comments to the May 15, 2025, Notice of Preparation of the Draft Environmental Impact Report for the San Diego Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project) located in the cities of Del Mar, Solana Beach and San Diego, California ("NOP").

I. INTRODUCTION

This comment is submitted on behalf of the 97 families and the owners, whose physical address is 201 and 89 Stratford Court Del Mar CA 92104. Los Arboles apartments reserves the right to comment further on any revised NOP, draft EIR or EIS or final EIR or EIS. We refer in our letter to the proposed route as outlined on the included amended NOP diagram which includes both the Northern Yellow Line Route as well as the south yellow line route.

Los Arboles Apartments Location

Los Arboles is a 97-unit apartment complex located in the southwest corner of Del Mar, CA.
Los Arboles apartments is a mulit-family complex with elderly residents that lived at the complex for over 40 years and many famlies with children. As a result of the multi-family housing in the southwest portion of Del Mar, the area is densely populated.

Figure 3. Four Project Alternative Alignments

II. PRELIMINARY STATEMENT ON NOP OF May 15, 2025

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Property managers of Los Arboles apartments have attended several of the SANDAG Board meetings and were pleased that Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings, that he was "committed" to study the Northern Yellow Line route in the Environmental Impact Report even though it is shown only in the footnotes of the document, citing lack of sufficient time to develop the route as the reason that it was not a formal part of the recommended routes. We belive Mr. Orso will be true to his words and that in fact this alternative route will be included as a route in the EIR study for final consideration.

Los Arboles appreciates that Mr. Orso has taken the time to listen to the community.
to the community and that the senior team seems to understand the impact the community will feel with any of the other four routes (omitting the no build route).

Specific to Los Arboles apartments , the path of the Purple Line Route along Camino Del Mar does not truly follow Camino Del Mar and in fact takes a turn as it approaches fourth street and goes directly under Los Arboles, which is a four-story apartment building , home to people of all ages and income levels, and under the two-story and three-story buildings of Del Mar Woods.

The NOP shows that the train route then goes under the homes to the south of Del Mar Woods and out of a portal a few hundred meters beyond the property. The train depth under Los Arboles apartments and Del Mar Woods is shallow given the potential risks of train derailment and subsequent explosion from the flammable materials transported on the freight and military cars.

III. COMMENTS ON THE SOUTH PORTALS

In our review of the documents provided, there is still insufficient information in the NOP to comment **fully** on the Portal Options (or on the NOP Route Options). For example, as to portals, while there is additional information and maps, the NOP lacks critical information on the exact path of the route regarding specific location, width, height of portal, or the width, depth underground and height of the tunnel, the size and location of ventilators, the location, acreage, size of ventilation related buildings referenced in SANDAG's 2023 Tunnel Analysis Report ("2023 SANDAG Report"), noise and vibration levels of construction and operation of the trains, staging area of construction or duration of construction. **Nonetheless, there is sufficient information for Los Arboles apartments to make initial comments**

The South Portal Options are as follows:

Two south portal locations have been identified depending on the track alignment. The portal locations are as follows:

Torrey Pines Road Portal

This proposed portal would be located near the intersection of Carmel Valley Road and North Torrey Pines Road. The portal infrastructure would cross underneath Carmel Valley Road and potentially extend into residential and commercial properties in Del Mar.

Los Arboles strongly objects to the "Torrey Pines Road" south portal option. The Torrey Pines Road portal option would be located near the intersection of Carmel Valley Road and Torrey Pines Road, which is at the

southern tip of Camino Del Mar and only a few hundred meters from Del Mar Woods, Los Arboles apartments and many other homes and businesses. A Project Objective is to **"Minimize impacts in the surrounding communities during and after construction."** This objective is of particular importance to Del Mar residents in light of the fact that while all of San Diego is said to benefit from the rail line, it is the Community of Del Mar that is being compelled to disproportionately, and almost exclusively, shoulder the burden of the realignment. The very least that SANDAG can do is to select or create portals and a route that minimizes the negative impacts to Del Mar and its residents.

Other cities benefit from rail service, but no other city is affected by the choice of the realignment route and the portals as is Del Mar (the City of San Diego would be slightly impacted by the alternate choice of the I-5 Knoll option). The selection of the Torrey Pines Road Portal would maximize negative impact to our community. Some of the reasons, among others are:

- The portion of the Del Mar community that is very close to the Torrey Pines Road portal option is densely populated. It includes the 126-condominiums of DMW, the 97 apartments of Los Arboles, and numerous single-family homes close to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA (p.9 of the NOP):
    - Air Quality will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of fumes and pollution from diesel output and other concentrated Greenhouse Gas Emissions spewed from the ventilation systems close to their homes.
    - Virtually continuous Noise of the ventilation systems and both Noise and Vibration of continuous freight and passenger trains descending and traveling right under their homes.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Continuous **Noise** of trains entering and exiting the portal.
    - Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[1]
    - The risks of carrying **Hazardous Waste** under their homes.

[1] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

    - The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
- In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    - The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to Torrey Pines State Beach.
    - Elimination of pedestrian and bicycle paths during construction.
    - The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    - Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    - The delivery of **Emergency Public Services** will be impeded or blocked.
    - Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    - All of the detriments to Del Mar's residents discussed above.
    - The loss of additional square meters of environmentally sensitive lagoon acreage with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon.

I-5 Knoll Portal

In contrast, the construction of the alternate I-5 Knoll portal would have none of the above effects. Thus, of the few study options for the South Portal offered by SANDAG in the NOP, **the I-5 Knoll is by far the better alternative with the lesser negative impacts to the community.**

IV. COMMENTS ON THE NORTH PORTAL OPTIONS

The North Portal options in the updated NOP are as follows:

Under Jimmy Durante Boulevard Portal

This proposed portal would be located north of the intersection of Camino Del Mar and Jimmy Durante Boulevard. The portal's infrastructure would cross underneath Jimmy Durante Boulevard, which would be raised. **The portal structures would potentially extend into commercial and residential properties in Del Mar.**

I-5 Racetrack View Portal

This proposed portal would be west of the I-5 Freeway close to homes located south of the fairgrounds along Racetrack View Drive. The route would be elevated along the protected San Dieguito Lagoon right along the nesting area for the Western Snowy Plover and other native species (some endangered) which was built at great expense with the restoration of the Lagoon. This route will cause issues for wildlife and untold issues for the thirty plus homes close to that portal.

The Jimmy Durante Boulevard option ("JDB") is unacceptable. **The portal construction and operation would inflict the maximum negative impact on Del Mar, its businesses and residents**. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is not "potential," it is certain. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.

The Racetrack View Portal Option is a challenge in many ways as noted above. It is located very close to the San Dieguito Lagoon, a protected wetlands, that underwent a major restoration that began in 2006 and Phase II was recently completed in 2024. This location will dramatically impact both homes and the lagoon. While it is going to move the construction further from the City center there is no entrance to this route without going through the main intersection that supports all traffic for the racetrack and fairgrounds in and out of Del Mar. This impact will be felt by both residents and visitors, and it will dramatically impact evacuation routes with heavy equipment and trucks.

V. Los Arboles apartments COMMENTS ON THE NOP STUDY ROUTES

Purple Line, Blue Line and South Yellow Line Routes

For many of the same reasons Los Arboles apartments objects to the Torrey Pines Rd. south portal, it objects to the Purple, Blue, and South Yellow Routes .

- Regarding the Purple Line Route, which tunnels under Camino Del Mar, the amount of disruption and destruction to Del Mar businesses in the construction process would be continuous and extreme. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city. A double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on residents' homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.

    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Accelerated bluff erosion as the vibrations from the tunnel through the sandstone will cause additional cracks in the earth allowing water penetration and erosion to occur.
- Regarding the Blue Line Route, a portal right into people's homes and at an elevation to allow noise to carry across the entire area will cause irreparable harm to many. The double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of the portal and over the tunnel will be:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to and under their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.
    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.

Green Line Route

The addition of a double-tracked bluff route was not a welcome addition to the updated NOP in our view. We understand and appreciate the staff's desire to include a non-tunnel option however it does not pass even a rudimentary feasibility test.

The purpose of the study of the proposed routes is to move the tracks off the crumbling sandstone bluff not to study ways to add additional tracks to a fragile environment. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double- track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the bluffs and beach at the expense of the public. The

almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed the California coast for 50 years. According to SANDAG, double tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:" According to the Coastal Commission "If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law does not preempt state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023.

This option also requires the use of eminent domain to take private property so that the eroded thin crumbling bluffs can be expanded to the east.

Northern Yellow Line Route

The Northern Yellow Line Route is the only one that utilizes the non-populated areas of this beachside community and public lands. It allows the route to be built with the lowest impact on residents and the least impact on businesses. It would allow businesses to remain open during construction and limits the impacts to private homes by routing the train along public lands where gaining the necessary right of way would be much simpler and less expensive.

With consideration given to maintaining the horse racing and fair schedules and to strategically planning how to do the construction staging in such ways as to minimize impact to fairground operations, this route is far superior to any of the other routes in the NOP. The impact on residents in Del Mar and San Diego would be far less and it would also limit the traffic flow disruptions for residents of all of the beach communities who use the routes through Del Mar for commuting to work or school or for access to restaurants and businesses.

This route would also dramatically limit the number of lawsuits that SANDAG and NCTD will face over eminent domain and the purchasing of land access rights and would head off the foreseeable class action suits that will be brought to compensate for generations of adverse health effects if any of the other routes are selected.

In short it has the following advantages:

1. No negative impact on ANY homes or businesses.
2. Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.
3. Places no air-polluting portals near homes, near the coast or near the Fairgrounds.
4. Bores no tunnels under or near homes.
5. Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an
   easement for which compensation can be paid to the Fairgrounds without displacing families.
6. No negative impact on the City of Solana Beach.
7. Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.
8. Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.
9. Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.
10. It is expected to cost considerably less than other routes that require tunneling right under homes and eminent domain of homes and businesses.
11. Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delays.

IV. COMMENTS ON SANDAG'S RESPONSIBILITY TO DO A "NO PROJECT" ANALYSIS AND TO HAVE A COST/BENEFIT ANALYSIS PREPARED.

As part of its draft EIR, SANDAG must do a "no project" analysis. In addition, the SANDAG Board, in fulfillment of its duty of reasonable business prudence, must have an independent cost/benefit analysis prepared.

"No Project"

CEQA requires SANDAG engineers to do a "no project" analysis as an alternative. In this case, since continuing bluff instability mandates that the trains must stop operating on the bluffs, removing the tracks must proceed. If, however, after SANDAG does a cost/benefit analysis, it is determined to move forward with relocating the tracks as opposed to finding 21st Century ways to move freight and people, then the "no project" analysis really means "not this project" and would require SANDAG engineers to go back to the drawing boards.

The inescapable fact is that implementing either the Purple Line Route, Blue Line Route, South Yellow Line Route or Double Track Green Route together with the Torrey Pines Road south portal and the JDB portal or Racetrack View Portal, would destroy Del Mar, its culture, property values and economy, and is too high a price to pay in pursuit of a form of transportation that does not fit the needs of the area. **The Northern Yellow Line Route** is the only current study route that circumvents homes and businesses and does not require the use of eminent domain at least affords Del Mar a path to survive the assault of realignment, **is the only acceptable alternative.**

V. Issues Specific to Los Arboles Apartments

These issues remain the same as in our earlier comment letter on the previous NOP,because the most impactful route was not significantly changed. The route chosen to study (Purple LineRoute) still does not make the turn to follow Camino Del Mar but instead goes directly under part of Los Arboles Apartments and Del Mar woods HOA. Los Arboles is a 97-unit complex built in the early 1970's was not built to withstand the types of vibrations and shaking that will come with a loaded freight train or military transport train rumbling underneath it. With the location of the complex so close to the portal for the purple Line Route, the depth of the tunnel underneath the complex will hardly be deep enough to protect the homes and their walls and foundations from damage. As we understand from discussions with your tream the portal openings must start high enough to account for sea level rise and can only proceed down at the maximum 2% grade. Your updated NOP documents show a depth of around 100 to 120 feet below the buildings. A quick investigation says that sandstone will allow vibrations to reach these buildings on a normal day, and any type of explosion would be catastrophic. The buildings it will go under (as shown in the updated NOP maps) are three story buildings housing families and many older residents. The path also goes under the underground car park.
This complex can not sustain the loaded rail cars travelling under the four-story buildings or cement garages.
Consideration must be given to the route plan impacting this large condominium complex and your engineers must take into consideration the building materials and techniques used at that time they were built. Stresses on buildings from vibration and the human health impacts are very real.
We have requested that your project team study the soil in this specific area as part of its geological work.

Los Arboles apartments objects to selection of the Purple Line Route and urges the project team to consider the impact on not only the train (speed, duration of tunnel, costs, etc.) but the impact on the quality of life for residents and the structural impacts to real property and the impact on the price of many of the residents and the oweners of Los Arboles Apartments.

VI. Additions needed to the NOP

- Vibrational impact studies specific to the materials used in 1970 construction of homes and garages. Specifically pertaining to three story buildings and underground parking.

- Circulation during construction for densely populated areas with limited ingress and egress options both for emergency services as well as daily access
- Impacts on housing prices before, during and after construction
- Funding of a separate account to pay for on-going damage (if the Purple Route is selected) for repairs to cracked foundations and underground cement parking garages due to shaking and vibrations
- Worst case scenarios from an explosive incident in a shallow tunnel under a three-story building
- Studies of potential health risks as noted earlier in this letter
- Study of an alternative route that directly follows Camino Del Mar with its slight curves versus the straight-line route depicted today – a one second difference in time is worth preservation of homes and residents' health

Conclusion

The residents and owners of Los Arbols apartments are supportive of the work SANDAG is doing to move the railroad tracks off the eroding sandstone bluffs but it believes that SANDAG has in its current NOP only one realistic alternative which will serve the purpose of track relocation and preserve the lives and the way of life for the **This is the Norther n Yellow Line Route.**

We have emailed our comments and have voiced them at SANDAG meetings urging the Board to take a longer view and find a long-term solution to move the tracks not only off the Del Mar Bluffs but out of all of the densely populated coastal towns and put them along the I-5 transportation corridor. That route however, is not an option in the current NOP. We urge SANDAG staff and Board to reconsider this option during the EIR process.

Thank you for your time,

Very truly yours,

Jennifer Athens

Managing Owner, Del Mar, California.

Respond to:athensjennifer@gmail.com

Attachments: LPLF - 2025 NOP Comment Letter on LOSSAN Rail Realignment 4917-6435-5917 v.1.pdf

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From: Denise Ortiz <DOrtiz@sheppardmullin.com>
Sent: Wednesday, June 18, 2025 8:11:19 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: lheebner@cosb.org <lheebner@cosb.org>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; jminto@cityofsanteeca.gov <jminto@cityofsanteeca.gov>; kevin.shin@carlsbadca.gov <kevin.shin@carlsbadca.gov>; cchavez@chulavistaca.gov <cchavez@chulavistaca.gov>; jduncan@coronado.ca.us <jduncan@coronado.ca.us>; tgaasterland@delmar.ca.us <tgaasterland@delmar.ca.us>; bwells@elcajon.gov <bwells@elcajon.gov>; behlers@encinitasca.gov <behlers@encinitasca.gov>; Dane@danemwhite.com <Dane@danemwhite.com>; jack.fisher@imperialbeachca.gov <jack.fisher@imperialbeachca.gov>; marapostathis@cityoflamesa.us <marapostathis@cityoflamesa.us>; asnow@lemongrove.ca.gov <asnow@lemongrove.ca.gov>; Lmolina@nationalcityca.gov <Lmolina@nationalcityca.gov>; esanchez@oceansideca.org <esanchez@oceansideca.org>; svaus@poway.org <svaus@poway.org>; mayortoddgloria@sandiego.gov <mayortoddgloria@sandiego.gov>; rjones@san-marcos.net <rjones@san-marcos.net>; kmelendez@cityofvista.com <kmelendez@cityofvista.com>; joel.anderson@sdcounty.ca.gov <joel.anderson@sdcounty.ca.gov>; terra.lawson-remer@sdcounty.ca.gov <terra.lawson-remer@sdcounty.ca.gov>; Mario Orso <mario.orso@sandag.org>; Paloma.Aguirre@coastal.ca.gov <Paloma.Aguirre@coastal.ca.gov>; darren.smith@parks.ca.gov <darren.smith@parks.ca.gov>; mikehastings1066@gmail.com <mikehastings1066@gmail.com>; rickgulley1@icloud.com <rickgulley1@icloud.com>; lisasierraclub@gmail.com <lisasierraclub@gmail.com>; hogansierraclub@gmail.com <hogansierraclub@gmail.com>; Alison.Feinswog@mail.house.gov <Alison.Feinswog@mail.house.gov>; Scott.peters@mail.house.gov <Scott.peters@mail.house.gov>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; alex.davis@sen.ca.gov <alex.davis@sen.ca.gov>; diana.kutlow@sen.ca.gov <diana.kutlow@sen.ca.gov>; rebecca.smith2@sdcounty.ca.gov <rebecca.smith2@sdcounty.ca.gov>; DAkers@sandiego.gov <DAkers@sandiego.gov>; famaciel@sandiego.gov <famaciel@sandiego.gov>; Garcia, Government Affairs Manager <juliog@sandiego.gov>; jquintero@sandiego.gov <jquintero@sandiego.gov>; Jennifer Chavez <JChavez@sheppardmullin.com>; Barbara Machado <bmachado@sheppardmullin.com>
Subject: SDLRR Updated Notice of Preparation

Dear SANDAG LOSSAN Team:

Per Attorney Jennifer Chavez's request, please see the attached letter of today's date.

Best regards,

Denise Ortiz
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June 18, 2025

File Number: 96LX-390166

VIA E-MAIL ONLY

SANDAG
1011 Union Street, Suite 400
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Email: lossancomments@sandag.org

Re: SDLRR Updated Notice of Preparation

Dear SANDAG LOSSAN Team:

This firm represents the Los Peñasquitos Lagoon Foundation (the "Foundation"). The Foundation works with the California Department of Parks and Recreation to protect, restore, enhance, and preserve the Los Peñasquitos Lagoon ("Lagoon"), a State Marsh Natural Preserve (PRC § 5019.71) that is part of the Torrey Pines State Natural Reserve ("Reserve"). Since its establishment in 1983, the Foundation has helped lead the effort in restoring, protecting and preserving the Lagoon through stakeholder collaboration and adaptive management informed by 37 years of continuous data generated by our biological monitoring program and partnerships with universities that include the University of California, San Diego and the Scripps Institution of Oceanography. Impacts to the Lagoon caused by transportation infrastructure that includes the current railway alignment have been well documented in scientific papers, aerial imagery, reports and planning documents that include the Los Peñasquitos Lagoon Enhancement Plan and its Program level Environmental Impact Report, certified in 2020. With this in mind, the Foundation appreciates the opportunity to comment on SANDAG's Updated Notice of Preparation (NOP) of a Draft Environmental Report for the Los Angeles-San-Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project ("Project"). The Foundation further appreciates the additional public outreach and analysis that was undertaken in connection with the updated NOP for the Project.

Please consider the following comments regarding the scope and content of the environmental information to be included in the EIR.

1. Present a Single Proposed Project and Consider a Reasonable Range of Alternatives. The EIR should evaluate a single proposed project in detail, and a reasonable range of alternatives to the project that would avoid or substantially lessen the significant environmental effects of the proposed project. CEQA does not permit a lead agency to evaluate multiple alternatives without selecting a proposed project. (*Washoe Meadows Community v. Dept. of Parks & Recreation* (2017) 17 CA5th 277, 288.) The Foundation appreciates that SANDAG considered alternatives to remove the railway alignment from the Lagoon and locate it near Interstate 5, but as it moves toward the EIR stage, it needs to select a single alignment as the proposed project.

While all four alignments described in the NOP have the potential to generate impacts to coastal habitats, cultural resources, listed species, public access and viewsheds, **the Foundation supports alignments utilizing the "Knoll Near I-5" for the southern portal that currently include the "San Dieguito Bridge to I-5 Alternative Alignment" (Yellow Line) and "Under Crest Canyon Alternative Alignment" (Blue Line) and strongly opposes selection of the "Under Camino Del Mar Alternative Alignment" (Pink Line) and the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" (Green Line).**[1] Thus, the Foundation is supportive of the EIR presenting either the Yellow Line or Blue Line as the proposed project. The Pink Line and Green Line would perpetuate and exacerbate significant and unmitigable impacts to the Lagoon and should not be carried forward for further consideration. Both the Pink Line and Green Line should be treated as alternatives "considered but rejected." The Foundation also encourages SANDAG to consider additional alternatives that would avoid or minimize impacts to sensitive coastal resources.

2. The Project Objectives Should Prioritize Restoration and Enhancement of Coastal Resources Impaired by Railway Infrastructure. The Foundation is pleased to see that one of the objectives of the Project was revised to "avoid and/or minimize negative effects, ***and where possible enhance*** biological . . . wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places." The Foundation fully supports that one of the primary, fundamental objectives of the Project is to support the restoration and enhancement of Los Peñasquitos Lagoon, a State Marsh Natural Preserve, to meet this stated objective.[2] Therefore, the Project should proceed in a manner that restores the decades of damage the existing rail alignment has caused to Los Peñasquitos Lagoon. The current location of the tracks through the center of the Lagoon would never be considered in a *de novo* application. The placement of the southern portal at the Knoll Near I-5 with the Yellow Line or Blue Line would remove the railroad tracks and berm bisecting the Lagoon and provide an opportunity to correct the unintended consequences of the railway alignment's role in contributing to the degradation of the Lagoon that includes its listing on the Clean Water Act's Section 303(d) list of impaired waterbodies for sediment/siltation due to the existing railway berm that has reduced the Lagoon's tidal prism by cutting off tidal channels and impounded sediment-laden stormwater runoff in the upper Lagoon since 1925.[3] **The Foundation encourages SANDAG to study and carry forward a proposed project that will maximize**

[1] For ease of discussion, this letter will refer to the "San Dieguito Bridge to I-5 Alternative Alignment" as the "Yellow Line"; the "Under Crest Canyon Alternative Alignment" as the "Blue Line"; the "Under Camino Del Mar Alternative Alignment" as the "Pink Line"; and the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" as the "Green Line". This is consistent NOP Figure 3 and the terminology used at the NOP Scoping Meeting presentation on May 29.

[2] See "San Diego LOSSAN Rail Realignment Project Update", NOP PowerPoint presentation prepared by SANDAG, slide 6.

[3] See Cole and Wahl. 2000. A Late Holocene Paleoecological Record from Torrey Pines State Reserve, California. Quaternary Research 53, 341-351; ESA. 2018. Los Peñasquitos Lagoon Enhancement Plan. Prepared for Los Peñasquitos Lagoon Foundation.

restoration and enhancement of coastal resources impaired by railway infrastructure to meet the critical Project Objective to "preserve wetlands."

Proceeding with the Pink Line or Green Line, on the other hand, would perpetuate the railways' negative impacts on the Lagoon and potentially generate additional ones by converting the currently lightly-used single track into a heavily-used double track alignment through the center of the Los Peñasquitos Lagoon, with entirely new areas added at the northwest end. As the NOP states, this would require raising and widening the existing berm in the Lagoon to address flooding and sea level rise projects. The EIR/EIS will need to consider the legacy impacts of the current alignment that have contributed to existing conditions of Lagoon impairment and those that will be generated by implementation of the Pink Line or Green Line, including those that may not be offset by elevating portions of the new double track on additional bridge spans. Additionally, SANDAG will need to consider how their proposed project will impact large-scale restoration of the Lagoon that will be completed prior to realignment of the railway, with the Pink Line and Green Line having the greatest potential for impacts.

There would be new or more severe adverse environmental effects associated with the rail use under the Pink Line or Green Line that include increased noise, vibration, light and other impacts resulting from faster, more frequent train service that would come with double tracking. The analysis of the Pink Line and Green Line should include a detailed discussion of construction-related impacts, including full disclosure of the location of construction staging areas, construction access routes, related impacts on wetlands or other sensitive habitats, the amount and location of additional fill that might be required within or around the Lagoon, the location and impacts associated with the construction of bridge structures in the Lagoon, and the amount and duration of construction-related noise, lighting, vibration and other environmental impacts that will result from construction activities. The Lagoon is prone to flooding during rains – please also describe the measures that will be implemented to protect the construction site during weather events (preventing sediment, debris and construction materials and fluids from leaving the construction site).

The Pink Line or Green Line clearly would not further the stated project objective of "avoid[ing] and/or minimiz[ing] negative impacts, and where possible enhanc[ing] biological, cultural, and recreational resources of national, state or local significance, including publicly owned parks, beaches, wetlands, ecological reserves…" and should be rejected for further consideration on that basis. The Pink Line or Green Line clearly would have significant adverse impacts on the Lagoon and its important biological and wetland resources, which is inconsistent with stated project objectives.

3. <u>The Project Should Avoid Impacts to Sensitive Species and their Associated Habitats to the Maximum Extent Feasible.</u> The proposed project should avoid, or at the very least limit, impacts to sensitive species and their associated essential habitats present within the Lagoon within and adjacent to the project site to the maximum extent feasible. The Yellow Line or Blue Line would avoid much of the Lagoon by relocating the railway alignment adjacent to I-5 with a small portion of adjacent wetland and upland habitat potentially being affected. The Pink Line or Green Line maintain much of or all of the current alignment through the Lagoon while also penetrating an undisturbed area adjacent to the proposed Pink Line portal and expanding the

width and height of the existing rail embankment to accommodate double tracking and sea level rise. As such, the Pink Line or Green Line would likely result in the most impacts to sensitive species and their associated sensitive habitats. Replacing large sections of berm with a bridge proposed as a potential modification to the Pink Line or Green Line may improve conditions beyond their existing state but could present an additional suite of impacts to listed species that forage and nest within the vicinity of the existing alignment due to noise, vibration, lighting and other components associated with construction and subsequent rail use. Based on this, the Foundation requests that the proposed EIR/EIS consider potential direct and indirect impacts to sensitive species within the Lagoon that include light-footed Ridgway's rail, coastal California gnatcatcher, western snowy plover, Belding's savannah sparrow, wandering skipper, yellow-breasted chat, white-tailed kite and other raptors, southern mule deer, *Iva hayesiana*, *Artemisia palmeri*, and *Lasthenia glabrata* ssp. *coulteri.* In addition, the EIR/EIS will need to also consider the direct and indirect impacts to the essential habitats that support these sensitive species which include tidal salt marsh, non-tidal salt marsh, southern maritime chaparral, coastal sage scrub, and coastal succulent scrub. Known locations of some of these listed species is provided in Exhibit A. We also request that analysis of biological impacts consider both benefits and impacts to habitat based on function and value to the Lagoon so that impacts to higher tiered habitat (e.g., coastal salt marsh) are not valued the same as habitat of less value (e.g., impaired wetland, disturbed upland). Additionally, the EIR/EIS should consider the effects of noise, vibration lighting, and rail-related pollution associated with the construction and use of new infrastructure that includes increased rail speed and volume of rail traffic as they impact wildlife movement, sensitive species and the habitats that support both. **How will SANDAG ensure that the project will maximize the avoidance of impacts to sensitive species and their associated essential habitats using both qualitive and quantitative analysis? How will SANDAG mitigate impacts to sensitive species and their habitats that cannot be avoided?**

4. <u>The Project Should Improve Lagoon Hydrology by Reconnecting Historic Tidal Channels and Reduce Impoundment of Storm Water in the Upper Lagoon.</u> The EIR must evaluate the project's impacts on lagoon hydrology and should be designed and carried out in a manner that does not adversely impact the already degraded hydrological function of the Lagoon. The Foundation requests that each alternative be examined in accordance with their ability to improve lagoon hydrology with respect to tidal waters and storm water moving through the system. Special studies need to be conducted to examine the role that the railway berm degrades lagoon hydrology and what improvements (e.g., complete removal, partial removal) could be afforded by each of the proposed Project alternatives. This should be considered for both improving the Lagoon's tidal prism and reducing the retention time of impounded waters from storm runoff that have contributed to the Lagoon's impairment and listing on the Clean Water Act's Section 303(d) list of impaired waterbodies for sediment and siltation. The special studies will also need to consider how each alternative could support or impact large scale restoration the Lagoon that is being pursued for compliance under the Los Peñasquitos Lagoon Sediment Total Maximum Daily Load (TMDL) that focuses on improving lagoon hydrology as a key driver for restoring the Lagoon to its historical native habitats. Furthermore, the EIR/EIS should consider changes to local hydrology from the proposed infrastructure (e.g., rail widening, floodwalls, U-sections, and cut-and-cover features) and their effect on sedimentation and the balance of halophytic and freshwater habitats. **How will SANDAG ensure that the project will improve lagoon**

hydrology by reconnecting historic tidal channels and reduce impoundment of storm water in the upper Lagoon using both qualitive and quantitative analysis?

5. Impacts on Public Access to Torrey Pines State Beach. The Pink Line and Green Line are the only alternatives that will generate impacts to public access and use of Torrey Pines State Beach during the construction of the southern portal, double tracking, and rail realignment adjacent to the Torrey Pines North Beach Parking Lot (North Lot). The North Lot receives approximately 1.8 million visitors annually (based on 2016/2017 fiscal year data) due to its proximity to major roadway infrastructure that includes Interstate 5, Interstate 805, and State Route 56 that make it an easily accessible coastal facility for both nearby communities and those located further inland. The proposed EIR/EIS will need to examine and quantify these impacts since public access to North Torrey Pines State Beach will be limited or precluded during construction. In addition, the proposed EIR/EIS will need to examine how closure and/or limited use of the North Lot will impact the Reserve's other public parking facilities (i.e., Torrey Pines South Beach Parking Lot and upper Reserve parking) that are already under strain from increased demand by park visitors arriving by private vehicles. Secondary impacts associated with the lack of adequate parking facilities should also be examined. In addition to restricting public access to the beach, this could include increasing the emission of toxic contaminants in a sensitive coastal environment. To that end, the analysis should consider the potential loading of metals (e.g., zinc, copper) into Lagoon waters due to more frequent and higher volume from braking of vehicles[4] along Carmel Valley Road with either the Pink Line or Green Line, including the truck trips to remove excavated material from the tunnel-boring operation truck loads. **How will SANDAG ensure that the project will avoid impacts to public access to Torrey Pines State Beach using both qualitive and quantitative analysis?**

6. Opportunities and Constraints for Removing the Existing Railway Berm. The proposed EIR/EIS will need to examine both the opportunities and constraints for removing the existing railway berm in its entirety or in designated sections for the proposed project and all the project alternatives being considered under CEQA analysis. The Foundation requests that technical analysis consider both aquatic and terrestrial environs to assess opportunities and constraints for improving both hydrology and wildlife movement within the Lagoon that are currently comprised by the existing railway alignment, as well as the proposed alignments and their components. Analysis should also consider opportunities within each alternative that optimize the expansion of foraging and nesting habitat of listed bird species that include Belding's savannah sparrow, light-footed Ridgway's rail and California gnatcatcher that are currently fragmented by the existing alignment. Of course, the analysis should also focus on the avoidance of adversely impacting foraging and nesting habitat of those species. Analysis should also examine the potential for beneficial re-use of the current railway alignment should the Pink Line or Green Line not be selected as the preferred alternative. One example for consideration would be to modify the existing berm into a pedestrian and bike path to support multi-modal transportation within the coastal zone, a priority for SANDAG under their Public Works Plan and Transportation Resource Enhancement Program prepared for the LOSSAN Corridor. This would be accomplished by

[4] Many brake pads contain metals that wear away a little by little. The metal breaks down into dust each time you apply the brakes. Brake pads can contain as much as 20 percent copper, which is toxic to aquatic life at the base of the food chain. They also contain lead and zinc. (Source: US EPA)

connecting coastal areas and established regional and local trail networks (e.g., the California Coast Trail) to the commercial areas of Sorrento Valley and the Sorrento Valley Coaster Station. Another potential for beneficial reuse of sections of the existing berm could be used to offset impacts related to sea level rise by providing an onsite source of sediment that could be used to augment elevation profiles of surrounding habitat to ensure that coastal salt marsh and wetland transitional areas are preserved in perpetuity. Should partial or complete removal of the berm result as part of the project, the Foundation strongly advises that all related mitigation efforts to offset impacts to Lagoon resources be focused entirely on the Lagoon rather than an offsite location. **How will SANDAG ensure that the preferred alternative considers both opportunities and constraints for removing the existing railway berm using both qualitive and quantitative analysis? How will impacts be mitigated and where?**

7. Compliance of the Project under Section 4F (U.S. Transportation Act of 1966) and Actions Permitted in a State Natural Preserve. The proposed project will have to consider impacts to publicly owned parks, recreational areas, wildlife and waterfowl refuges, and historical sites to comply with Section 4F of the U.S. Transportation Act of 1966. SANDAG will need to prove that the project it selects under CEQA/NEPA will comply in a manner that "the use of the property will have a *de minimis* impact or that there is no feasible and prudent avoidance alternative to the use of the land, and that the action includes all possible planning to minimize harm to the property resulting in such use." In addition, SANDAG will need to comply with the public resource code as it relates to the management, protection and preservation of a State Natural Preserve (PRC § 5019.71). State Natural Preserves are considered "distinct areas of outstanding natural or scientific significance established within the boundaries of State Parks System units." The purpose of Natural Preserves is "to preserve such features as rare or endangered plant and animal species and their supporting ecosystems, representative examples of plant or animal communities existing in California prior to the impact of Euro-American modifications, geological features illustrative of geological processes, significant fossil occurrences or geological features of cultural or economic interest, or topographic features illustrative of representative or unique biogeographical patterns." Importantly, "Natural Preserves shall be managed to allow natural dynamics of ecological interaction to continue without interference, where possible. Habitat manipulation shall be permitted only in those areas found by scientific analysis to require manipulation to preserve the species or associations that constitute the basis for the establishment of the Natural Preserve." **How will analysis under CEQA/NEPA demonstrate that the project complies with Section 4F of the U.S. Transportation Act of 1966 and the management, protection and preservation of a State Natural Preserve (PRC § 5019.71)?**

8. Impacts on Aesthetics. Potential impacts on public viewsheds and scenic vistas should be evaluated in the draft EIR/EIS for the Project and each alternative with consideration given to ensuring these new features are avoided to the extent feasible and otherwise designed in a manner that is compatible with the surrounding environs. **How will SANDAG ensure that the project will avoid or minimize impacts to aesthetics?**

9. Impacts on Air Quality. The Alignments Screening Report, May 31, 2024, includes tables estimating the number of truck trips for the alignments under consideration, but the estimates appear limited to truck trips for the disposal of construction material associated with tunnels. It does not appear that truck trips have been analyzed for other aspects of the work to be done for

these alignments. Please provide estimates for truck trips for all aspects of each alignment—including, but not limited to, the construction of berms, bridges, site preparation, demolition of homes or other structures, etc. **How will SANDAG ensure that the proposed project will avoid or minimize impacts to air quality using both qualitive and quantitative analysis?**

10. Joint EIR/EIS. The Foundation encourages SANDAG to prepare a Joint EIR/EIS document rather than deferring the NEPA evaluation to a separate, future process. A joint evaluation provides for a more efficient use of resources by SANDAG, the Foundation and other stakeholders, as well as a more comprehensive and coordinated environmental review.

The Foundation's position today is consistent with our letter on this topic to Mr. Veeh dated August 27, 2023; comments on the 2024 NOP in a letter dated July 11, 2024; comments on the results of the Value Analysis Report in a letter dated February 25, 2025; and is consistent with positions expressed by our local environmental and community partners: California State Parks, Torrey Pines Community Planning Board, Torrey Pines Conservancy and Sierra Club San Diego, as well as the feedback you've received from numerous involved environmental community members over the past year of study. Given that the most commonly cited arguments in favor of public transportation involve reducing private transportation's negative environmental impacts, it is only logical that SANDAG's railway realignment be done in a manner which minimizes its negative impacts on Los Peñasquitos Lagoon's fragile environment.

We strongly encourage you to take every opportunity to enhance Los Peñasquitos Lagoon's native and historic environment as you evaluate this project and select an alignment that avoids and minimizes significant adverse environmental effects to the maximum extent feasible. The Foundation appreciates that SANDAG considered alternatives to remove the railway alignment from the Lagoon and locate it near Interstate 5. While all four proposed alignments (Yellow Line, Blue Line, Pink Line, and Green Line) have the potential to generate impacts to coastal habitats, cultural resources, listed species, public access and viewsheds, **the Foundation supports alignments utilizing the "Knoll Near I-5" for the southern portal ("San Dieguito Bridge to I-5 Alternative Alignment" (Yellow Line) and "Under Crest Canyon Alternative Alignment" (Blue Line)) and strongly opposes selection of the "Under Camino Del Mar Alternative Alignment" portal location (Pink Line) and the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" (Green Line).**

Please do not hesitate to contact the Foundation if you would like to discuss this idea further.

Sincerely,

Jennifer Chavez
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Enclosure

cc: SANDAG Board: Lesa Heebner, Chair (lheebner@cosb.org); Joe LaCava, First Vice Chair (JoeLaCava@sandiego.gov); John Minto, Second Vice Chair (jminto@cityofsanteeca.gov); Kevin Shin (kevin.shin@carlsbadca.gov); Carolina Chavez (cchavez@chulavistaca.gov); John Duncan (jduncan@coronado.ca.us); Terry Gaasterland (tgaasterland@delmar.ca.us); Bill Wells (bwells@elcajon.gov); Bruce Ehlers (behlers@encinitasca.gov); Dane White (Dane@danemwhite.com); Jack Fisher (jack.fisher@imperialbeachca.gov); Mark Aropostathis (marapostathis@cityoflamesa.us); Alysson Snow (asnow@lemongrove.ca.gov); Luz Molina (Lmolina@nationalcityca.gov); Esther Sanchez (esanchez@oceansideca.org); Steve Vaus (svaus@poway.org); Todd Gloria (mayortoddgloria@sandiego.gov); Rebecca Jones (rjones@san-marcos.net); Katie Melendez (kmelendez@cityofvista.com); Joel Anderson (joel.anderson@sdcounty.ca.gov); Terra Lawson-Remer (terra.lawson-remer@sdcounty.ca.gov);
SANDAG: Mario Orso, Chief Executive Officer (mario.orso@sandag.org);
California Coastal Commission: Commissioner Paloma Aguirre (Paloma.Aguirre@coastal.ca.gov)
California State Parks: Darren Smith, Senior Environmental Scientist (darren.smith@parks.ca.gov)
Los Peñasquitos Lagoon Foundation: Mike Hastings, Executive Director (mikehastings1066@gmail.com)
Torrey Pines Conservancy: Rick Gulley, President (rickgulley1@icloud.com)
Sierra Club San Diego: Lisa Ross, Chair (lisasierraclub@gmail.com); David Hogan, Vice Chair (hogansierraclub@gmail.com)
US Congress: Representative Mike Levin (Alison.Feinswog@mail.house.gov); Representative Scott Peters (Scott.peters@mail.house.gov)
CA State Senate: Senator Blakespear (senator.blakespear@senate.ca.gov); Alex Davis, Principal Consultant (alex.davis@sen.ca.gov); Diana Kutlow, District Rep (diana.kutlow@sen.ca.gov)
County of San Diego: Rebecca Smith, District 3 Neighborhood Rep (rebecca.smith2@sdcounty.ca.gov)
City of San Diego, Mayor's Office: Dion Akers, Regional Government Affairs Manager (DAkers@sandiego.gov); Fatima Maciel, Community Representative (famaciel@sandiego.gov)
City of San Diego, District 1: Brian Elliott, Deputy Chief of Staff (belliott@sandiego.gov); Julio Garcia, Government Affairs Manager (juliog@sandiego.gov); Joaquin Quintero, Community Representative (jquintero@sandiego.gov)

SMRH:4917-6435-5917.1

EXHIBIT A

Legend
Belding's savannah sparrow
California gnatcatcher
Least Bell's vireo
Ridgway's clapper rail
Western snowy plover
5
720
360
0
720 Feet

Attachments: Del Mar Tunnel Options RailPAC Comments 2025.06.24.pdf

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From: Brian Yanity <brian@railpac.org>
Sent: Tuesday, June 24, 2025 7:00:07 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR ProjectNOP, Comments on LOSSAN Corridor Del Mar Rail Realignment Alternatives Analysis

Hon. Lesa Heebner, Chair
San Diego Association of Governments (SANDAG)
ATTN: LOSSAN Comments
1011 Union St., Suite 400
San Diego, CA 92101
via email to: lossancomments@sandag.org

June 24, 2025

Subject: SDLRR Project NOP, Comments on LOSSAN Corridor Del Mar Rail Realignment Alternatives Analysis

Dear Chair Heebner and Board Members,

I am writing on behalf of the members of the Rail Passenger Association of California and Nevada (RailPAC) living, working, and traveling along the LOSSAN Corridor. RailPAC is an all-volunteer 501(c)(3) statewide organization that advocates for the improvement of commuter and intercity passenger rail service.

RailPAC strongly supports the goal of transforming the LOSSAN Corridor into a high-performance, high-capacity auto competitive rail corridor. Moving this vital rail line off of the crumbling Del Mar bluffs into a protected tunnel alignment is a key step toward achieving this goal. By undertaking this project, SANDAG will ensure that the nation's 2nd busiest intercity passenger rail corridor will continue to serve many generations in the future, creating tremendous value for Southern California residents while reducing GHG emissions and avoiding ever widening freeways.

RailPAC strongly supports **the alternative alignment under Camino Del Mar**. This option under Camino Del Mar, transitioning to the existing right-of-way through Los Penasquitos Lagoon, is the shortest, and lowest-cost tunnel option. The deep tunnels (100-200 feet) directly under the two streets would cause no more disruption during construction and operations than a deep subway tunnel under a street as has been done in many major cities worldwide, including in California. The lagoon segment will be raised and double-tracked and include improvements to improve lagoon habitat with additional bridges to improve water flow, address flooding and sea level rise. The track speed rating should be 90-mph.

RailPAC strongly opposes the "No Build" and "Del Mar Bluffs Double Track Reinforced (in existing right-of-way)" alternative alignments, because the rail line needs to be rerouted off the eroding bluffs. The "San Dieguito Bridge to I-5" alternative alignment should also be rejected. It is the most expensive tunnel option, yields no train run time savings and will be and risky operational challenge for freight trains.

The Camino Del Mar alignment lends itself into being split into two distinct construction segments,

the tunnel segment and the lagoon segment. This could aid in construction sequencing and utilization of the flow of funds. In addition, if the lagoon segment, a less complex segment, is constructed while the tunnel design is underway, the second track could be used to support tunnel construction delivering by rail construction materials and the haulage of tunnel spoils by rail.

RailPAC urges SANDAG to futureproof the tunnel by building it with enough vertical clearance to accommodate both an overhead contact system for rail electrification, and the tall auto-rack cars that serve the Port of San Diego. Electrification is the global gold standard and is well proven for successful frequent and fast passenger trains around the world. It is crucially important for enabling higher train speeds and frequencies and will be more than economically justified by the train frequencies of up to four trains per hour envisioned by long-term plans for the corridor. Finally, hydrogen train propulsion in the confined space of a tunnel has tremendous safety risk due to hydrogen leakage.

The San Diego/Del Mar LOSSAN Rail Realignment Project is critical to the surrounding communities and the region. As SANDAG makes the routing strategy, the needs of the region's twenty-two million people for improved mobility and reduced greenhouse gases from transportation need to be the foremost consideration.

Thank you for your consideration.

Sincerely,

--

Best Regards,

Brian Yanity
Vice President-South and Board Member
Rail Passenger Association of California (RailPAC)
www.railpac.org
Fullerton, CA

RailPAC
Rail Passenger Association
of California and Nevada

P.O. Box 22344
San Francisco CA 94122

www.railpac.org

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Brian Yanity
Vice President- South and Board Member, RailPAC
Fullerton, California
Email: brian@railpac.org

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Rail Passenger Association
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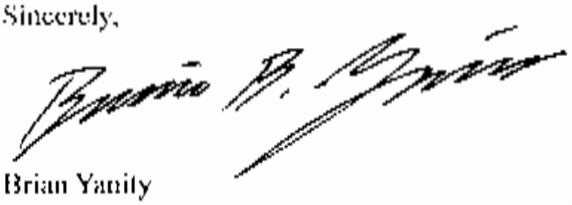
Thank you for your consideration.

Sincerely,



Brian Yanity
Vice President- South and Board Member, RailPAC
Fullerton, California
Email: brian@railpac.org

Attachments: Ride SD Bike SD FINAL TEXT ONLY SIGNATURE.png
2025_RideSD_CFER_LOSSAN_Statement.pdf

From: Leif Gensert <leif@ridesd.org>
Sent: Monday, June 30, 2025 3:03:02 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: contact@ridesd.org <contact@ridesd.org>; Adriana Rizzo <adria.i.rizzo@gmail.com>
Subject: Public Comment: LOSSAN Rail Realignment EIR - Support for Under Crest Canyon Alignment

Dear SANDAG Board of Directors,

I hope this message finds you well. Please find attached a formal comment letter from RideSD and Californians for Electric Rail regarding the LOSSAN Rail Realignment Environmental Impact Report. We appreciate the opportunity to provide input on this important regional infrastructure project and thank you for your consideration of our recommendations supporting the Under Crest Canyon alignment. We look forward to continuing to work with SANDAG on advancing sustainable transportation solutions for our region.

Best regards,

Leif Gensert
Vice President
www.RideSD.org

RIDESD

www.ridesd.org
contact@ridesd.org
www.calelectricrail.org
info@calelectricrail.org

Subject: LOSSAN Rail Realignment Environmental Impact Report Comment

To the Honorable SANDAG Board of Directors,

RideSD is San Diego's premier transit education and advocacy organization, and Californians for Electric Rail is a grassroots, volunteer organization of Californians fighting for fast, clean, and safe catenary electric rail in California.

We write to express our **strong support for the Under Crest Canyon alignment** in the LOSSAN Rail Realignment Project. We thank you for the comprehensive Value Analysis Study and your continued commitment to addressing the climate resilience challenges facing this critical rail corridor. We wish to express our explicit support for the Under Crest Canyon alignment for several compelling reasons:

1. **Reliability:** The tunnel design completely removes trains from vulnerable coastal bluffs prone to erosion and landslides, ensuring consistent service that riders can depend on year-round.
2. **Speed and Efficiency:** With 110 mph design speeds through the tunnel, this option maintains competitive travel times between San Diego and Los Angeles, encouraging more people to choose rail over car travel and reducing traffic congestion and greenhouse gas emissions.
3. **Community Impact:** The Under Crest Canyon alignment reduces residential subsurface easements by 22% compared to the original Alternative B, minimizing disruption to neighborhoods while preserving prior infrastructure investments.
4. **Environmental Benefits:** All other alignments cut through lagoons, while Crest Canyon does not–allowing for lagoon restoration at Los Penasquitos and an enhanced wildlife habitat.

Per our previous correspondence for the public scoping, we strongly urge SANDAG to ensure **tunnel clearances accommodate overhead catenary wire electrification.** KPBS's recent article, "Rail advocates fear Del Mar project could lock in slower, more polluting trains to LA", highlights this urgency. Precluding overhead electrification with a too-narrow tunnel clearance amounts to selecting a zero emissions technology for the corridor for decades to come. Hydrogen fuel cell trains pose additional hazards, notably risk of explosions, particularly in tunnels. The EIR must include mitigation measures for these hazards, or avoid selecting a technology at this time by allowing sufficient tunnel clearances.

In conclusion, the Under Crest Canyon alignment represents the best compromise among competing priorities: it provides excellent operational performance, minimizes community impacts, demonstrates fiscal responsibility, and positions the LOSSAN corridor for long-term success. This option will deliver the reliable, fast rail service that Southern California deserves while protecting our coastal environment. We urge SANDAG to advance the Under Crest Canyon alignment as the preferred alternative in the upcoming environmental review process.The LOSSAN corridor is the highest-ridership rail corridor outside of the Northeast, and we urge SANDAG to prioritize ridership growth and long term regional transportation needs in this major infrastructure investment.

Thank you for your continued leadership on this critical regional infrastructure project.

Sincerely,

Leif Gensert
Vice President
RideSD

Adriana Rizzo
Co-founder
Californians for Electric Rail

Attachments: NOP Comments_Final_SCSD_ LOSSAN Del Mar Realignment_06-30-2025.pdf

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From: Dave Hogan <hogansierraclub@gmail.com>
Sent: Monday, June 30, 2025 11:20:34 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: SDLRR Project NOP

Please see the attached comments from Sierra Club San Diego Chapter on SANDAG's Updated Notice of Preparation of a Draft Environmental Impact Report for the LOSSAN Rail Realignment Project.

Dave Hogan
Sierra Club San Diego Chapter

SIERRA CLUB
SAN DIEGO CHAPTER

June 30, 2025

SANDAG
1011 Union Street Suite 400
San Diego, CA 92101
LOSSANcomments@sandag.org

ATTN: LOSSAN Comments

The San Diego Chapter of the Sierra Club submits the following comments on SANDAG's Updated Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). These comments address the four alternatives included in the NOP and provide general criteria to minimize impacts and protect and restore the natural environment around the Project. These comments also apply to any other alternatives that may be added for consideration in the Environmental Impact Report (EIR).

Sierra Club San Diego (SCSD) supports realignment of the Del Mar segment of the LOSSAN rail corridor off sensitive coastal bluffs.

On SANDAG's Project objectives identified in the NOP, SCSD fully supports the objective to, *Avoid and/or minimize negative effects, and where possible enhance biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places.* But three of the four NOP alignment alternatives and two of the four tunnel portal locations included in the NOP do not meet this objective and would eliminate the ability to achieve this objective, the *Del Mar Bluffs Double Track Reinforced Alternative Alignment*, *Under Camino Del Mar Alternative Alignmen*t, *San Dieguito Bridge to I-5 Alternative Alignment*, *Racetrack View Drive* tunnel portal, and *Torrey Pines Road West* tunnel portal.

SCSD also urges modification or addition of objectives to accommodate managed retreat from sea level rise, maximize reduction of greenhouse gas emissions, and accommodate rail electrification.

Realignment of the LOSSAN rail corridor off the Del Mar bluffs would improve efficiency and travel times for passenger and rail freight transportation, improve public safety and access to

the coast, and support managed coastal retreat by removing the existing dangerous and unsustainable current rail alignment. But realignment could also result in significant impacts to the environment without special conditions to avoid, minimize, and mitigate any harm. Any alignment alternatives included in the EIR should minimize impacts and protect and restore the natural environment to the maximum extent feasible consistent with SCSD positions on Project design and mitigation described below.

SCSD supports realignment of the LOSSAN rail corridor off the Del Mar bluffs conditioned upon design and mitigation measures to ensure that the Project is located and constructed in a manner that minimizes impacts and maximizes protection and restoration of the natural environment including biodiversity, natural open space, wildlife corridors, wetlands, bluffs, and beaches, and minimizes harm to communities, especially during construction. The Project should specifically minimize impacts and maximize protection and restoration of natural habitats and preserves in Los Penasquitos and San Dieguito lagoons, Crest Canyon, and Torrey Pines State Natural Reserve. And the Project should support managed coastal retreat from rising sea levels and improve public safety and coastal access.

RECOMMENDED MEASURES

The following are Sierra Club recommended measures for design, construction, and mitigation for the Project to minimize impacts and maximize protection and restoration of the natural environment and that should all be included in the EIR.

Protect existing conserved lands

Project alternatives should be located outside of, or tunneled deep under existing conserved lands to the maximum extent feasible, Crest Canyon Preserve, San Dieguito Lagoon, and Torrey Pines State Natural Reserve. In the event that any vertical vent shafts are needed for Project tunnels, surface vents should be located outside of conserved lands. Existing conserved lands protect important concentrations of biodiversity and are cherished destinations for outdoor recreation. These conserved lands are so ecologically unique that they are irreplaceable, and no comparable undeveloped land is available for mitigation. As such, any alternative alignments should be located to totally avoid surface impacts to conserved lands and should instead be located elsewhere or constructed in tunnels. And tunnel vent locations should be adjusted as necessary to totally avoid surface impacts to conserved lands and should instead be constructed in existing developed areas such as parking lots, vacant lots, and road edges or medians. Will vertical tunnel vents be needed for the Project? And what Project alternatives, design elements, and mitigation measures will be included in the EIR to avoid and minimize impacts to existing conserved lands to the maximum extent feasible?

Protect and restore San Dieguito and Los Penasquitos lagoons

Any Project crossings of San Dieguito and Los Penasquitos lagoons should not impede tidal or freshwater flows and should protect and restore wetlands hydrology and ecology to the maximum extent feasible. Project crossings of the two lagoons should therefore be located in tunnels, not on berms or bridges. Any southern tunnel portal and realigned approaches to the

southern portal should be located outside of Los Penasquitos Lagoon and Torrey Pines State Natural Reserve and as close as possible to Pump Station 65 or the intersection of Carmel Mountain Road and Old Sorrento Valley Road. And any northern tunnel portal and realigned approaches to the northern portal should be located outside of San Dieguito Lagoon and Lagoon conserved lands.

Other possible measures to protect and restore lagoon hydrology and ecology should include support for regular reopening of the primary tidal channels to the ocean for San Dieguito and Los Penasquitos lagoons (excluding construction of jetties that would impede movement of beach sand). And support should be provided as part of the Project for restoration of existing damaged hydrology and ecology of Los Penasquitos Lagoon.

What Project alternatives, design elements, and mitigation measures will be included in the EIR to minimize impacts and protect and restore coastal lagoon wetlands hydrology and ecology to the maximum extent feasible?

Protect and restore wildlife corridors

Any Project crossings Los Penasquitos Lagoon and Carmel Creek should be in tunnels to protect critical existing movement corridor for deer, predators, and other wildlife in and between Torrey Pines State Natural Reserve, Los Penasquitos Lagoon, and Carmel Valley. Wildlife movement is severely constrained in this area from development and Interstate 5 and only three wildlife corridors remain connecting Torrey Pines State Natural Reserve and Los Penasquitos Lagoon to conserved lands east of I-5 and I-805 in Carmel Valley, Los Penasquitos Canyon, and Carroll Canyon and Marine Corp Air Station Miramar. One of these three remaining corridors is in and along Los Penasquitos Lagoon and Carmel Creek and would be crossed by all Project NOP alternatives.

Any Project crossings of Crest Canyon should also be in tunnels to protect a critical existing movement corridor for deer, predators, and other wildlife in and between the Crest Canyon Preserve and the San Dieguito Lagoon.

What Project alternatives, design elements, and mitigation measures will be included in the EIR to minimize impacts and protect and restore wildlife corridors to the maximum extent feasible?

Control invasive non-native plants

The Project should prohibit deliberate planting of any non-native plants and provide a program for permanent control of non-native plants that will foreseeably and continually colonize the Project area over time. Non-native plants are a major threat to biodiversity and thrive in any disturbed areas, especially those disturbed for construction or landscaping around development and infrastructure like the Project. Even without deliberate planting, many non-native plants like eucalyptus, pampas grass, fountain grass, veldt grass, and others will inevitably colonize the Project area and spread into adjoining sensitive conserved lands. What Project alternatives, design elements, and mitigation measures will be included in the EIR to minimize impacts from invasive non-native plants to the maximum extent feasible?

Remove old rail Infrastructure

Removal of all old rail infrastructure will also be necessary to protect and restore wetlands hydrology and ecology in San Dieguito and Los Penasquitos lagoons and other sensitive habitats. Removal of the entire old earthen berm across Los Penasquitos Lagoon and the old bridge across the San Dieguito Lagoon channel will be essential to restoration of wetlands hydrology and ecology. The Project EIR should therefore include conditions for removal of all old rail infrastructure with restoration to wetlands, coastal bluff scrub, coastal sage scrub, and other location-appropriate native vegetation. What old rail infrastructure would be removed to protect and restore hydrology and ecology in wetlands and other sensitive habitats under Project alternatives in the EIR and how would this be implemented to the maximum extent feasible?

Removal of old rail infrastructure should also include removal of all stabilization rock and structures from Del Mar beaches and bluffs to allow for managed coastal retreat with natural bluff erosion and beach sand replenishment. Removal of existing embedded pilings along the Del Mar bluffs is likely to be difficult and harmful if attempted all at once at the time of construction of the Project. The Project should therefore anticipate and provide for removal of pilings as they are exposed over time through natural erosion. Specifically what old rail infrastructure would be removed from Del Mar beaches and bluffs under Project alternatives in the EIR and how would this be implemented to the maximum extent feasible?

Historic photographs suggest that fill soils in the existing earthen berm across Los Penasquitos Lagoon may have originated from the Del Mar bluffs during original construction. Fill soils from the berms should therefore be utilized to restore the Del Mar bluffs and beaches as appropriate. How will Project alternatives, design elements, and mitigation measures will be included in the EIR to address removal and disposal of the earthen berm across Los Penasquitos Lagoon to the maximum extent feasible? Would Project alternatives include consideration of use of fill soils from the Los Penasquitos Lagoon berm for restoration of Del Mar bluffs and beaches where appropriate?

Construct a Del Mar bluffs park

One Project design or mitigation measure that could help offset construction impacts to communities, impacts to pedestrian and bicycle infrastructure, and impacts to coastal access is construction of a linear park in and around the old Del Mar rail alignment with public walking and bike paths and stairway and accessible ramp connections to the beach. The Project should therefore include measures to reconstruct the existing rail corridor on the Del Mar bluffs into a linear park. But park and beach public access infrastructure should not interfere with natural bluff erosion and managed retreat from sea level rise so the Project should anticipate and plan for removal of park infrastructure over time as necessary. Will the Project include construction of a linear park in and around the old Del Mar rail alignment? What Project alternatives, design elements, and mitigation measures will be included in the EIR to minimize the loss and directly replace and increase coastal access around Del Mar to the maximum extent feasible?

Construct a Solana Beach linear park

Another Project design or mitigation measure that could help offset construction impacts to communities, impacts to pedestrian and bicycle infrastructure, and impacts to coastal access is construction of a linear park with public walking and bike paths on a covered trench or tunnel over the rail alignment in Solana Beach south of Lomas Santa Fe and north of Via De La Valle. This should be considered in the EIR irrespective of whether rail realignment extends into Solana Beach because Solana Beach residents and businesses will still be significantly impacted by construction. Will the Project include construction of a linear park in and around the rail corridor through Solana Beach? What Project alternatives, design elements, and mitigation measures will be included in the EIR to minimize the loss and directly replace and increase coastal access around Solana Beach to the maximum extent feasible?

Retain and improve active transportation infrastructure

The Project should retain and improve active pedestrian and bicycle transportation infrastructure and connections along Carmel Valley Road, Jimmy Durante Boulevard, Old Sorrento Valley Road south of Carmel Valley Road, South Highway 101, under I-5 at Carmel Creek, the San Dieguito River Park Coast to Crest Trail, and between the Coast to Crest Trail and Crest Canyon. Retaining and improving active transportation infrastructure will help mitigate Project impacts and contribute to complete essential active transportation infrastructure around the Project. What Project alternatives, design elements, and mitigation measures will be included in the EIR to minimize the loss and directly replace and increase active transportation infrastructure to the maximum extent feasible?

Minimize construction impacts

The Project should include design and mitigation measures providing for the shortest possible periods and smallest areas of construction to minimize GHG emissions, impacts to air quality, noise, and other impacts to communities and conserved lands and resources to the extent that such alternatives do not result in greater permanent impacts to the natural environment as described above (e.g. the NOP *Del Mar Bluffs Double Track Reinforced Alternative Alignment* should not be considered as an alternative in the EIR because despite removing tunnel construction this will still result in significant impacts to Los Penasquitos Lagoon).

What Project alternatives, design elements, and mitigation measures will be included in the EIR to minimize GHG emissions, impacts to air quality, noise, and other impacts to communities, conserved lands, and resources to the maximum extent feasible without increasing permanent impacts to the natural environment?

Facilitate rail electrification

SCSD also urges consideration of Project design necessary to facilitate rail electrification. Realignment and tunnel and tunnel portal design necessary to accommodate rail electrification should be considered as part of any Project alternatives in the EIR. What Project alternatives,

design elements, and mitigation measures will be included in the EIR to facilitate rail electrification to the maximum extent feasible?

SANDAG NOP ALTERNATIVES

SCSD opposes three of the four alignment alternatives and two of the four tunnel portal locations included in the NOP due to significant and unnecessary impacts to the environment and inconsistency with SANDAG's Project objectives:

- *Del Mar Bluffs Double Track Reinforced Alternative Alignment*
- *Under Camino Del Mar Alternative Alignment*
- *San Dieguito Bridge to I-5 Alternative Alignment* including the possible "more northerly variation of this alternative alignment noted in the NOP
- *Racetrack View Drive* tunnel portal
- *Torrey Pines Road West* tunnel portal

None of these alignment alternatives or tunnel portals should be considered further in the EIR.

SCSD opposes the *Del Mar Bluffs Double Track Reinforced Alternative Alignment* because this location is not sustainable due to unstable coastal bluffs, it would result in significant and unmitigable impacts to the environment by requiring massive new infrastructure to reenforce the bluffs and widen the rail alignment across Los Penasquitos Lagoon, and it would block essential coastal retreat necessary to accommodate rising sea levels.

SCSD opposes the *Under Camino Del Mar Alternative Alignment* and the related *Torrey Pines West* tunnel portal because they would result in significant and unmitigable impacts to the environment by requiring new infrastructure across Los Penasquitos Lagoon and would impact sensitive habitats at the tunnel portal.

SCSD opposes the *San Dieguito Bridge to I-5 Alternative Alignment* including the possible "more northerly variation of this alternative alignment" noted in the NOP as well as the related *Racetrack View Drive* tunnel portal because they would result in significant and unmitigable impacts to the environment by requiring new infrastructure along or over San Dieguito Lagoon and would impact sensitive habitats and a crucial wildlife corridor at the tunnel portal.

One other NOP alignment alternative, the *Under Crest Canyon Alternative Alignment* and two tunnel portal alternatives, the *Under Jimmy Durante Boulevard* and *Knoll Near I-5* do appear worthy of further study for inclusion in the EIR. SCSD supports further study of the *Under Crest Canyon Alternative Alignment* and the two tunnel portal alternatives *Under Jimmy Durante Boulevard* and *Knoll Near I-5* because they would relocate the alignment off sensitive coastal bluffs and mostly out of Los Penasquitos Lagoon, accommodate coastal managed retreat, minimize impacts and improve conditions of sensitive habitats and wildlife movement corridors, and otherwise minimize impacts to the natural environment.

SCSD also urges consideration in the EIR of a more southerly tunnel portal alternative located near Carmel Mountain Road and identified as Alternative Concept 3 in the 2025 Final Value

Analysis Study Report. This tunnel portal location is inexplicably excluded from the NOP despite providing the significant environmental benefit of virtually eliminating impacts to Los Penasquitos Lagoon and sensitive habitats on the I-5 knoll and facilitating full restoration of the Lagoon. This more southerly tunnel portal alternative should be considered as part of appropriate alignment alternatives in the EIR.

Thank you for your consideration. Please contact Dave Hogan with any questions at hogansierraclub@gmail.com or 760 809-9244.

Sincerely,

Ron Askeland, Chair
Sierra Club San Diego Conservation Committee

Dave Hogan, Chair
Sierra Club San Diego Legal Committee

Attachments: Surfrider Scoping Comments, Updated NOP, SDLRR Project.pdf

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From: Mitch Silverstein <msilverstein@sandiego.surfrider.org>
Sent: Sunday, June 29, 2025 4:29:50 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Beach Preservation Committee <beachpres@surfridersd.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the attached Draft EIR Scoping Comments for the Updated SDLRR NOP from Surfrider Foundation.

Thank you,

Mitch Silverstein | Senior San Diego County Policy Coordinator
Surfrider Foundation | 619.736.7757 | msilverstein@sandiego.surfrider.org
he/him (what's this)

29 June 2025

Delivered via email to: lossancomments@sandag.org

Re: Scoping Comments re: NOP of an EIR for LOSSAN (SDLRR Project NOP)

To whom it may concern,

The Surfrider Foundation San Diego County Chapter (Surfrider) appreciates this opportunity to provide public comments in response to the Notice of Intent to prepare an Environmental Impact Report for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). Surfrider is a non-profit 501(c)(3) organization that is dedicated to the protection and enjoyment of our ocean, waves and beaches for all people. Towards this mission, Surfrider has been very engaged in the effort to relocate the railroad tracks away from the coast, in order to protect this area's beaches, public beach access, and public trust recreational resources from harmful armoring.

SANDAG's most recent Project documents raise several concerns about the scope and objectives of the Project, and these concerns must be addressed to meet CEQA requirements and for public safety and maintaining and improving public beach access.

Background

Surfrider San Diego chapter members have commented on Del Mar Bluffs Stabilization 5 project (DMB5) in several forums, including at California Coastal Commission, Del Mar City Council, and SANDAG meetings. Specifically, chapter members worked with SANDAG and California Coastal Commission staff on Consistency Certification No. CC-0005- 21 (DMB5). This project included the construction of upper bluff stabilization structures, seawalls with rip rap backfill, new and retrofit drainage infrastructure, and public access improvements. It also included grading and placement of fill to reduce bluff slopes and after-the-fact authorization for two recent emergency repairs in order to support the existing railroad and maintain its operations along a 1.7-mile corridor between Seagrove Park and Torrey Pines State Beach in Del Mar, San Diego County. Chapter members submitted written comments to SANDAG's previous LOSSAN scoping notice for the Project and attended various public hearings and meetings related to the Project. Chapter members have also engaged in numerous ad hoc meetings with SANDAG to provide feedback on both the Project and DMBS5.

Guiding principles and requirements of the California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires robust analysis of significant effects, alternatives to the project, and any feasible mitigation measures to mitigate or avoid those effects. CEQA was enacted to further legislative policies including:

- The maintenance of a quality environment for the people of California now and in the future, and preventing environmental damage (Cal. Pub. Res. Code § 21000) CEQA further declares that policies of the State include: taking "all action necessary to protect, rehabilitate, and enhance the environmental quality of the state" (Cal. Pub. Res. Code § 21001(a))
- Taking all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities (Cal. Pub. Res. Code § 21001(b)).

CEQA requires the preparation of an Environmental Impact Report (EIR) for projects that may have significant effects on the environment "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided" (Cal. Pub. Res. Code § 21002.1(a)). The lead agency shall be responsible for considering the effects, both individual and collective, of all activities involved in a project (Cal. Pub. Res. Code § 21002.1(d)). Therefore, under CEQA, an EIR must consider all significant effects on the environment from the project, including any irreversible effects and cumulative effects from the project; and any potentially feasible alternatives and other measures to mitigate or avoid those effects (Cal. Pub. Res. Code § 21100; 14 Cal. Code Regs. § 15130). The EIR requirement is the heart of CEQA (*County of Inyo v. Yorty,* 32 Cal. App. 3d 795).

Projects must be properly defined

CEQA requires a lead agency to initially determine the project's purpose and objectives (CEQA Guidelines, § 15124(b)), and that the EIR "describe a range of reasonable alternatives to a project that would feasibly attain most of the project's basic objectives while avoiding or substantially lessening any of the project's significant effects" (CEQA Guidelines, § 15126.6(a)). A clearly written statement of objectives is required to help the lead agency develop a reasonable range of alternatives to evaluate in the EIR (CEQA Guidelines, § 15124(b)).

SANDAG, the lead agency for this Project, has provided an Updated Notice of Preparation (NOP) which raises a lot of concerns, as it includes new "updated Project objectives" which could improperly and artificially constrain the alternatives considered and the analysis of how well the alternatives meet the purported objectives**.** The original NOP from 2024 demonstrated the agency's clear objective of "improving rail service reliability by *relocating the existing railroad tracks away from the eroding coastal bluffs in Del Mar*" (emphasis added). In addition to a No Project alternative, the NOP included consideration of three inland realignments. While not labeled as a "goal" but rather as an "objective," relocation away from the tracks was the clear ultimate goal of the project.

However, the new NOP improperly frames a newly labeled "goal" of the project as "to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN rail corridor," and has removed the prior objective and any reference to relocating the existing tracks away from Del Mar's eroding coastal bluffs. Additionally, the new NOP includes a new non-tunnel "Del Mar Bluffs Double Track Reinforced Alternative Alignment" that would keep railroad tracks along the coast.

The initial NOP had a clear objective to move the tracks away from the coast. When compared with the updated NOP's new project objectives, it is clear that the new objectives are an artificially narrow pretext that could improperly lend support to the newly added coastal alternative.[1]

By attempting to "update" the objectives, the agency is improperly constraining the alternatives considered and artificially limiting their potential ability to meet the new project objectives. Courts have held that project objectives are impermissibly narrow where they effectively describe the proposed project and therefore preclude informed decision making, public participation, and other reasonably feasible alternatives (*We Advocate Through Environmental Review v. County of Siskiyou* (2022) 78 Cal.App.5th 683).

Surfrider implores the agency to return to and uphold its original goal, which is needed for both the long term efficacy of the railroad and protection of our coastal resources.

The Environmental Impact Report must consider significant effects

An EIR must study impacts across many important areas, including aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services and recreation, and transportation and traffic. Surfrider submits that many of the new Project Alternatives have potential significant impacts to the above. Additionally, the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" alternative has such significant impacts

[1] Other new purported objectives that could similarly and collectively skew the agency's alternatives analysis include:
"Minimize impacts to existing homes, businesses, tourism, and major economic generators, including the Del Mar Fairgrounds, and transportation facilities during and after construction;"
"Avoid and/or minimize impacts on biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places" was changed to, "Avoid and/or minimize negative effects, and where possible enhance biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places" (emphasis added; the agency should restore the emphasis on minimizing the negative impacts on biological, cultural, and recreational resources, as well as keep the goal of enhancing those resources, including parks and beaches); and
"Minimize impacts to existing homes, businesses, tourism, and major economic generators, including the Del Mar Fairgrounds, and transportation facilities during and after construction." (This purported objective is impermissibly narrow, and not properly an objective of the project, the – newly asserted - purpose of which is "to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN rail corridor.")

that it should be considered an alternative that is not feasible.[2] The alternative is not feasible for at least the following reasons:

1. **It violates land use planning required by California Coastal Consistency Certification No. CC-0005- 21, DMB5.** In a letter to SANDAG dated February 27, 2025, the California Coastal Commission agrees: "*In the application submittal to the Commission for CC-0005-21, SANDAG stated that it had identified the need for, and begun pursuit of, the relocation of the rail corridor off of the Del Mar Bluffs by as soon as 2035, at which point the seawalls proposed as part of the stabilization project would no longer be necessary to protect the rail line and could be removed. Shoreline structures, such as seawalls, generally result in a variety of adverse impacts on coastal resources, including on sand supply, public access and recreation, coastal views, natural landforms, and overall shoreline beach dynamics on- and off-site, ultimately resulting in the loss of beach. In light of these impacts, the Commission staff was only able to recommend concurrence, and the Commission was able to concur, because SANDAG had committed to plan for relocation of the railroad and because SANDAG has designed the seawalls to be removed after relocation was complete. This approach was also found to be consistent with the Commission's Sea Level Rise (SLR) Guidance for critical infrastructure (like the Los Angeles-San Diego-San Luis Obispo Corridor).*"

The Staff report for CC-0005-021 itself states "*SANDAG is currently in the process of planning to relocate the tracks consistent with the regional transportation plan; however, given the magnitude and complexity of that effort and outstanding funding needs for final design, environmental review, and construction, implementation of the relocation may extend beyond the target date of 2035.*"[3]

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[2] Cal. Code Regs. Tit. 14, § 15126.6 - Consideration and Discussion of Alternatives to the Proposed Project "(a) Alternatives to the Proposed Project. An EIR shall 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." … (f) Rule of reason. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

(1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745, 1753, fn.1)."

[3] https://documents.coastal.ca.gov/reports/2022/6/W7b/W7b-6-2022-addenda.pdf page 1.

The Staff Report also includes Condition One, "Authorization Term":

> *a. Authorization for all seawalls included in this consistency certification (including those subject to emergency repairs in 2021) shall expire thirty (30) years from the date of Commission action (i.e., June 8, 2052) or upon relocation and legal abandonment of the sections of railroad at issue in this action, whichever occurs first. No less than six months prior to the expiration of the authorization, SANDAG shall submit to the Coastal Commission a complete coastal development permit application or consistency certification to remove all of the seawalls and rip-rap included in this consistency certification and to restore the affected areas to natural conditions, except as allowed pursuant to subsection (b). If a complete permit application or consistency certification is filed before the end of the authorization period, the authorization period shall be automatically extended until the time the Commission acts on the consistency certification or permit.*
>
> *b. If relocation and legal abandonment of the rail line has not been completed in 30 years and SANDAG wishes to keep any portion of the seawalls or rip-rap in place beyond the 30 year time period, it must submit a complete, new consistency certification no less than six months prior to the expiration of the authorization. At that time, the Commission will need to consider authorization for the retention of the seawalls in light of the then-existing standard of review, including assessment of any needed mitigation for the ongoing impacts of the structure(s) and an evaluation of actions to reduce or eliminate those impacts. If a complete consistency certification is filed before the end of the authorization period, the authorization period shall be automatically extended until the time the Commission acts on the consistency certification.*"

2. **Even if SANDAG were to apply at the 30 year expiration for a new permit, nothing in conditions for CC-0005-021 authorizes the additions** of a new second track, a relocated primary track, and a trench for the new tracks as described in the Project's proposed Del Mar Bluffs Double Track Reinforced Alternative Alignment. These additions would be considered New Development under the Coastal Act. The project must comply with the Land Use authority of the Coastal Act in a new Consistency Determination and/or compliance with the Del Mar Local Coastal Program.

The Coastal Commission has already informed SANDAG in its letter dated February 27, 2025 that New Development is inconsistent with the Coastal Act in this location because the New Development will rely on shoreline protective devices such as seawalls and/or soldier piles as well as upper bluff reinforcement as described in the alternative for the Project. The letter reads (emphasis added):

"*If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21, its SLR Guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls. In addition, this alternative would add 1.5 miles of new shoreline armoring to the beach in*

southern Del Mar and, over the long-term, likely result in its permanent loss. Based on prior analyses of the significant bluff erosion and stability hazards to the existing railroad in Del Mar, ***the addition of a second track on the bluffs also appears to be inconsistent with Coastal Act Section 30253(b), which requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. As such, Commission staff have serious concerns about the regulatory implications and challenges presented by the Del Mar Double Track Reinforce Alternative and do not consider it to be viable. We therefore strongly recommend that the SANDAG Board act to not move forward this alternative for further consideration in the Draft EIR.***"

The Coastal Commission's letter also points out that the addition of 1.5 miles of seawalls would substantially alter natural landforms inconsistent with both the Coastal Act and the requirement of CEQA to have a viable alternative with mitigated impacts to Land Use Planning and Aesthetics.

The Commission also points out that the Project alternative would result in "permanent loss" of "beach" which is inconsistent with the recreational policies of Chapter 3 of the Coastal Act, the California Constitution[4], and the requirement of CEQA to have a viable alternative with mitigated impacts to Land Use Planning and Recreation.

3. **The Project's proposed Del Mar Bluffs Double Track Reinforced Alternative Alignment is inconsistent with previous CEQA analysis**, specifically the LOSSAN Programmatic EIR for the Rail Corridor, which eliminated double track in place from consideration (Record of Decision Los Angeles to San Diego, California (LOSSAN))[5].

[4] Sections 30210, 30211, 30212, 30220, 30221 of the Coastal Act and Section 4 of Article X of the California Constitution promote free and open access to the coastline and are part of the Recreation and Access policies of the Coastal Act.

[5] https://railroads.dot.gov/sites/fra.dot.gov/files/fra_net/192/LOSSAN_ROD_FINAL_2009.pdf Department of Transportation Federal Railroad Administration Record of Decision Los Angeles to San Diego, California (LOSSAN) Proposed Rail Corridor Improvements See page 10

Table 1
LOSSAN Corridor Rail Improvements Alternatives Eliminated

Alignment	Reason for Elimination							
	Construction	Environment	Incompatibility	Right of Way	Connectivity/ Accessibility	Revenue/ Ridership	Train Performance	Environmental Concerns
San Juan Capistrano								
At-grade double-tracking in existing rail alignment		P	P	P				Historic resources
Downtown Cut-and-Cover Tunnel	P		P					
Dana Point/San Clemente								
At-grade double-tracking in existing rail alignment	P		P					
Short Trench	P	P	P				S	Beach aesthetics & access
Long Trench	P	P	P	S				Beach aesthetics & access
Long Single Tunnel (no station in San Clemente)	P					S		
Inland Bypass	P	P	S		P	P	P	Natural resources
Encinitas								
At-grade double-tracking in existing rail alignment	P		P					
Long Trench	P							
Del Mar								
At-grade double-tracking in existing rail alignment	P		P	P				
Trench in Bluffs	P	P	P	S				Beach aesthetics & access
Camino del Mar Tunnel #2		P	S	P				New crossing of lagoon

Notes:
Reason: Primary (P) and Secondary (S) reasons for elimination.
Construction: Includes engineering and construction complexity, cost and sub-optimal systems operations influence (i.e., slow train speeds).
Environment: Includes any factor that can be assigned to the environmental disciplines studied as part of theEIR/EIS.
Incompatibility: Incompatibility with current or planned local land use.
Right-of-Way: Includes lack of available rights-of-way, extensive right-of-way needs, and high cost.
Connectivity/Accessibility: Includes limited connectivity with other existing or future transportation modes (highway and/or transit systems).
Ridership/Revenue: The alignment or station would have a negative effect on the revenue or ridership for the system.
Train Performance: Includes impacts to reliability, running time improvement, and ability to accommodate freight.
Environmental Concerns: Notes on specific environmental areas of concern.

As shown in the table above, the alternative was eliminated at least primarily for Environmental Reasons including “beach aesthetics and access.” This reasoning is consistent with the position of California Coastal Commission's letter of February 27, 2025.

The Programmatic EIR has more detailed language about why the double track in place option was eliminated (LOSSAN EIR 2007, page 78)[6].

> "*An at-grade second track along the coastal bluffs in Del Mar would compound existing barrier and safety factors noted above for other locations. In addition, since the bluffs are continually eroding, it was apparent that any double-tracking alternative in this location*

6 https://railroads.dot.gov/sites/fra.dot.gov/files/2023-10/2.2.11%20LOSSAN%20Programmatic%20EIR-EIS%20%282007%29_PDFa.pdf

would require significant excavation work to stabilize the bluff-top. Stabilization would also require structures that would create substantial visual impacts and likely require significant on-going maintenance efforts to address erosion and drainage concerns. Therefore, this option was eliminated due to high construction and operational impacts and costs."

The Programmatic EIR was cited in the Coastal Commission's Findings and Declarations in Certification of Federal Consistency Determination CC-020-10, Construction of Del Mar Bluffs Railroad Track Stabilization Project 3 (DMB3). As the Commission found, DMB3 would not lead to double tracking along the Del Mar Bluffs or create a "hurdle" for moving the tracks inland[7].

"*With these commitments, the project can be constructed without adversely affecting the stability of the bluffs, the public beach at the foot of the bluffs, or railroad operations through this area. In addition, project implementation will not lead to double-tracking of the railroad through the Del Mar Bluffs area or serve as a hurdle to the eventual inland relocation of the track away from the bluffs, as SANDAG reported that the 2007 Final LOSSAN Program EIR/EIS eliminated any double track alternative along the Del Mar Bluffs. The project is necessary to protect an existing facility (the railroad tracks) from bluff erosion, is the least environmentally damaging feasible alternative for an interim (20 years) approach, and provides for future Commission review of future project elements or current elements that may become exposed over time. The project is consistent with the shoreline structures and geologic hazards policies of the California Coastal Management Program (CCMP)(Coastal Act Sections 30235 and 30253).*"

4. **SANDAG's latest NOP contradicts their own previous assessments.** For example, in pages 69-70 of the 2023 Alignment Alternatives study (emphasis added):

"*3.7 Del Mar Bluffs Alternative*

At a PDT meeting in March 2021, NCTD made a request to look at a double track alignment that would stay on the Del Mar Bluffs to show if it could be considered a viable alternative. ...

A 110-miles per hour alignment on the bluffs would result in more significant impacts compared with the other conceptual alternatives, where the alignments would move inland. In addition, retaining the alignment on the bluffs does not address the current safety risk presently being addressed with multiple bluff stabilization projects, which would have the potential to continue in perpetuity to maintain safe operations. These impacts combined with the direction from CCC to relocate the track off the bluffs leads to the conclusion that an alternative double track alignment along the bluffs is not a desirable solution. "

[7] https://documents.coastal.ca.gov/reports/2010/10/F6b-10-2010.pdf Staff Report in Findings and Declarations in Certification of Federal Consistency Determination CC-020-10 at page 15.

Additionally, pages 4-47 to 4-48 of the SANDAG February 2025 Value Analysis Report[8] state this alternative is not consistent with previous approvals and requires CCC approval and coordination:

> "*4.1.12 VA Alternative Concept No. 12 (IOC-04)*
>
> *Stabilize bluffs and widen existing alignment to accommodate a second track*
>
> *Estimated Cost: $1.9 to $2.5 billion*
>
> *Description of Alternative Concept: The intent of this alternative concept is to maintain the location of the existing rail alignment and add a second track to the east of the existing tracks within the railroad right-of-way. The second track would pass under the existing Torrey Pines Overhead bridge.*
>
> *...*
>
> *Discussion of Additional Considerations:*
>
> *This alternative concept is not consistent with prior approvals that require the tracks to be removed from the bluffs and sea walls to be removed. Additionally, CCC staff have expressed serious concerns with a concept explored in the past that would maintain the location of the existing rail alignment on the bluffs as it would hamper efforts to plan for sea level rise and erosion. Therefore, coordination and approval by the CCC would be required for the addition of a second track, the installation of new sea walls, and additional retaining structure along the Del Mar Bluffs. Specifically, a new federal consistency determination would need to be submitted to CCC for its concurrence*."

Additionally, at the California Coastal Commission meeting on June 8, 2022 in Del Mar, SANDAG promised to remove the track off the bluff in seeking approval of Consistency Certification No. CC-0005- 21, DMB5 consistent with the eventual conditions of the issued determination. The following is a transcription of testimony from applicant SANDAG's Chief Executive Officer Hasan Ikhrata for Consistency Certification No. CC-0005- 21, DMB5 (emphasis added):

> "*Jack and his team and our staff have been working for almost 3 years to get to this point. You know, I got to know Jack, and he's a straight shooter, he's a tough negotiator, but I really do appreciate the dialogue in conversation we have. You know* ***I said this to you when you came to Chula Vista****, that we're going to do everything possible from SANDAG's standpoint to make sure this corridor is safe.* ***Environmental sustainability is really paramount to us. And I also told you at that time that we're gonna start***

[8] https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/featured-p[…]bilization/lossan-sdsvdt-alternatives-analysis-2023-09-01.pdf

the process, removing the track off the bluff. And I made that promise to people of San Diego, to my board and since then we completed the $3 million study, corridor management study, almost complete*, to recommend two alternatives.* ***And now we're at the stage where we're ready to start the environmental and design work that's gonna cost about $300 million to look at how we move that rail off of the bluff. So, we're committing to the long-term solution.*** *In the meanwhile, we are doing that, we work with your staff to figure out how do we make sure it's safe, stabilized and also move forward with environmentally care. So we have a history."* (Testimony audio and video available here as well as on the Coastal Commission website at https://cal-span.org/meeting/ccc_20220608/).

5. **The $300 million in state funding to complete the environmental phase of this project was proffered on relocation and not a double track in place project**. SANDAG accepted $300m in State of California General Fund monies in the Transit and Intercity Rail Capital Program for the advancement of the San Dieguito to Sorrento Valley Double Track project (Capital Improvement Program No. 1239823). It is not permissible to use this money, which is funding this Draft EIR, to study leaving the tracks along Del Mar's bluffs.

The SANDAG Board of Directors voted to accept this funding at their September 9, 2022 Board meeting. The Staff Report that accompanied this Item explains the Project Scope as follows: *"Completion of Project Approval and Environmental Document (PA&ED) phase* ***re-aligning the LOSSAN rail corridor away from the Del Mar Bluffs with a double track system,*** *and the advancement of the design and right-of-way phases* (emphasis added)."[9] Similar language can be found in a December 2022 Memorandum to the California Transportation Commission, which states that the initial $152m allocation to SANDAG must be used for "completion of the environmental phase for a project that will cover the realignment of railroad tracks facing failure due to erosion into a tunnel that will cut through Del Mar Hill."[10]

Additionally, the CA Dept of Transportation added language governing how the $300m must be spent to their Master Agreement with SANDAG (Program Supplement 11SANDAGPS-04).[11] This document, signed by both CalSTA's Division of Rail and Mass Transportation Chief and SANDAG's Chief Financial Officer, states the following as its Project Summary, and goes on to detail over multiple pages that the money must be used to study realignment of the LOSSAN rail corridor away from the Del Mar Bluffs:

> *PROJECT SUMMARY: This program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar.*

[9] Staff Report Item 1: LOSSAN Realignment, Sept 9 2020
[10] Memorandum for Dec 8-9, 2022 CTC meeting
[11] San Diego Association of Governments Program Supplement 11SANDAGPS-04

The stated project scope of the $300m in state funding rests on the foundational infeasibility of double tracking in place due to the aforementioned irreversible negative impacts on the beach and coastal aesthetics, and also the unending battle of maintaining the tracks against a rapidly encroaching ocean and eroding bluffs.

Furthermore and based on the evidence above, Surfrider has concluded that studying the Del Mar Double Track Reinforced Alternative in this Draft EIR constitutes an improper use of state funds. Moving forward with studying this alternative could expose SANDAG to legal liability, and could jeopardize the remainder of the $300 funding and/or compromise future state funding towards completion of the SDLRR Project.

The EIR must consider less harmful alternatives

Fortunately, the Updated NOP proposes three alternative alignments that can feasibly achieve the SDLRR Project's goals in accordance with CEQA: the San Dieguito Bridge to I-5 Alternative Alignment, the Under Crest Canyon Alternative Alignment, and the Under Camino Del Mar Alternative Alignment. Surfrider supports further study of these alternatives, all of which can be pursued in conformance with SANDAG's previous commitments *including* Coastal Commission Consistency Certifications, the Coastal Act, the state funding that is financing this environmental review, and the reality that double tracking in place would destroy almost 2 miles of irreplaceable bluffs and beach *while* necessitating an unending battle against Mother Nature in the form of an encroaching ocean upon rapidly eroding bluffs.

The EIR must consider mitigation measures

Below is a summary of some of the mitigation measures that must be considered in this Draft EIR:

- When the train is relocated as required by CEQA, the Coastal Act, and Consistency Certification No. CC-0005- 21, DMBS5, mitigation measures for the Project should include that the temporary seawalls and soldier piles and other shoreline protective devices are removed since they are no longer required, per Section 30235 of the Coastal Act, to protect an existing structure from erosion. Instead, additional shoreline accesses should be provided. The existing right of way should be dedicated for public access or deeded to Del Mar and/or CA State Parks for such purposes. SANDAG has previously agreed that removal of soldier piles was feasible and required under previous Coastal Commission Federal Consistency Determinations as shown below[12]:

"Can the soldier pilings be removed if/when the rail line is relocated inland?

[SANDAG's answer to Coastal Commission] Yes, the soldier piles could be removed if and when the rail line is relocated inland. Note that as part of the conditions for CC-048-04,

[12] https://documents.coastal.ca.gov/reports/2010/10/F6b-10-2010.pdf Staff Report in Findings and Declarations in Certification of Federal Consistency Determination CC-020-10 at page 13.

SANDAG and NCTD agreed that when the environmental document for the removal of the tracks along the Del Mar Bluffs is prepared, as a portion of the project, the document will examine the removal of all visible concrete piling and in-fill walls."

● Should the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" remain under consideration, it would require considerable mitigation and ongoing maintenance. As is evident by the at least 6 SANDAG Stabilization projects in Del Mar, the area is subject to continued erosion and sea level rise impacts. Considerable sand nourishment projects to offset the impact of the continued presence of the seawalls and soldier piles required to stabilize the bluffs would be required in this Alternative. Nourishment via excavated bluff material from trench excavation would not be sufficient for several reasons: first, it would not be equal to the overall amount of sand that the bluffs would naturally provide over time via natural erosion. Additional nourishment via offshore dredging or from land-based sources would be required. More importantly, the excavated material would not be sufficient mitigation for additional beach space that bluff erosion would create over time, were the train to be removed from the bluffs so that the natural coastal process of landward beach migration could occur. Even with additional nourishment from offshore or another source, there is no equal mitigation for this permanent loss of future beach. The erosive forces of sea level rise would ultimately render sand nourishment ineffectual if the bluff line is artificially held in place. It is indisputable that the beach will be lost sooner under this alternative than those which propose moving the train elsewhere. Furthermore, sand nourishment has its own environmental consequences, including but not limited to the burial of reefs like the surfing reef at 8th Street, and the other reefs. Sand nourishment would also be upcoast of the littoral drift towards Penasquitos Lagoon, and could cause the lagoon mouth to be blocked, requiring additional dredging.

● The Project Alternative "Del Mar Bluffs Double Track Reinforced Alternative Alignment" must include costs and the impacts associated with ongoing mitigation as described, including the fact that the beach loss under this alternative cannot be fully mitigated. The costs and proposed mitigation must also include maintenance and repairs to seawalls and other similarly include shoreline protective devices, which will surely mount over time as sea levels rise into the 21st century. Would it even be feasible to maintain the seawalls after 2 or more feet of sea level rise, at which point a dry sand beach may no longer exist upon which crews and machinery may need to access in order to do repairs? Such eventualities must be considered and studied, including the potential that the Del Mar Double Track Reinforced Alternative would have a limited project life, thereby making eventual relocation away from the bluffs necessary at a future date.

● The Project Alternative "Del Mar Bluffs Double Track Reinforced Alternative Alignment" and "Under Camino Del Mar Alternative Alignment" include South Portals that impact the Penasquitos Lagoon. From the Updated NOP, pages 13-14:

"*existing railroad alignment within Los Peñasquitos Lagoon would be double tracked, which would require raising and widening the existing berm in the lagoon to address flooding and sea level rise projections*"

Filling precious lagoon resources and the additional impacts on wildlife during construction would have potentially unmitigated impacts.

Conclusion

Surfrider Foundation appreciates the opportunity to provide these comments. We urge SANDAG to remove the Del Mar Double Track Reinforced Alternative from consideration for the reasons explained in these scoping comments. Should you be unable to remove this non-tunnel alternative from consideration, we urge SANDAG to complete a full, extensive review of the environmental impacts of this alternative, including but not limited to mitigation for loss of beach and public access to the beach, whether such mitigation is even possible at this location considering the irreplaceable nature of coastal resources, and the as-of-yet unexplored mounting costs of unending maintenance and repair (including but not limited to sand nourishment) of the required stabilization elements to maintain a railroad atop eroding bluffs that will be subject to increasing wave runup *and* storm runoff due to climate change and sea level rise.

Sincerely,

Jim Jaffee and Kristin Brinner
Beach Preservation Leads
Surfrider Foundation San Diego County Chapter
beachpres@sandiego.surfrider.org

Mitch Silverstein
Sr. San Diego County Policy Coordinator
Surfrider Foundation
msilverstein@sandiego.surfrider.org

Attachments: Surfrider Scoping Comments, Updated NOP, SDLRR Project.pdf

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From: Mitch Silverstein <msilverstein@sandiego.surfrider.org>
Sent: Tuesday, July 1, 2025 12:24:58 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Beach Preservation Committee <beachpres@surfridersd.org>
Subject: SDLRR Project NOP

Dear LOSSAN Team,

Please accept the attached, re-submitted comments from Surfrider Foundation. Upon further consideration, we decided include our scoping comments from the previous NOP (July 2024) since the majority of those comments apply to this Updated NOP as well.

Thank you.

Mitch Silverstein | Senior San Diego County Policy Coordinator
Surfrider Foundation | 619.736.7757 | msilverstein@sandiego.surfrider.org
he/him (what's this)

29 June 2025

Delivered via email to: lossancomments@sandag.org

Re: Scoping Comments re: NOP of an EIR for LOSSAN (SDLRR Project NOP)

To whom it may concern,

The Surfrider Foundation San Diego County Chapter (Surfrider) appreciates this opportunity to provide public comments in response to the Notice of Intent to prepare an Environmental Impact Report for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). Surfrider is a non-profit 501(c)(3) organization that is dedicated to the protection and enjoyment of our ocean, waves and beaches for all people. Towards this mission, Surfrider has been very engaged in the effort to relocate the railroad tracks away from the coast, in order to protect this area's beaches, public beach access, and public trust recreational resources from harmful armoring.

SANDAG's most recent Project documents raise several concerns about the scope and objectives of the Project, and these concerns must be addressed to meet CEQA requirements and for public safety and maintaining and improving public beach access.

Background

Surfrider San Diego chapter members have commented on Del Mar Bluffs Stabilization 5 project (DMB5) in several forums, including at California Coastal Commission, Del Mar City Council, and SANDAG meetings. Specifically, chapter members worked with SANDAG and California Coastal Commission staff on Consistency Certification No. CC-0005- 21 (DMB5). This project included the construction of upper bluff stabilization structures, seawalls with rip rap backfill, new and retrofit drainage infrastructure, and public access improvements. It also included grading and placement of fill to reduce bluff slopes and after-the-fact authorization for two recent emergency repairs in order to support the existing railroad and maintain its operations along a 1.7-mile corridor between Seagrove Park and Torrey Pines State Beach in Del Mar, San Diego County. Chapter members submitted written comments to SANDAG's previous LOSSAN scoping notice for the Project and attended various public hearings and meetings related to the Project. Chapter members have also engaged in numerous ad hoc meetings with SANDAG to provide feedback on both the Project and DMBS5.

Guiding principles and requirements of the California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires robust analysis of significant effects, alternatives to the project, and any feasible mitigation measures to mitigate or avoid those effects. CEQA was enacted to further legislative policies including:

- The maintenance of a quality environment for the people of California now and in the future, and preventing environmental damage (Cal. Pub. Res. Code § 21000) CEQA further declares that policies of the State include: taking "all action necessary to protect, rehabilitate, and enhance the environmental quality of the state" (Cal. Pub. Res. Code § 21001(a))
- Taking all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities (Cal. Pub. Res. Code § 21001(b)).

CEQA requires the preparation of an Environmental Impact Report (EIR) for projects that may have significant effects on the environment "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided" (Cal. Pub. Res. Code § 21002.1(a)). The lead agency shall be responsible for considering the effects, both individual and collective, of all activities involved in a project (Cal. Pub. Res. Code § 21002.1(d)). Therefore, under CEQA, an EIR must consider all significant effects on the environment from the project, including any irreversible effects and cumulative effects from the project; and any potentially feasible alternatives and other measures to mitigate or avoid those effects (Cal. Pub. Res. Code § 21100; 14 Cal. Code Regs. § 15130). The EIR requirement is the heart of CEQA (*County of Inyo v. Yorty,* 32 Cal. App. 3d 795).

Projects must be properly defined

CEQA requires a lead agency to initially determine the project's purpose and objectives (CEQA Guidelines, § 15124(b)), and that the EIR "describe a range of reasonable alternatives to a project that would feasibly attain most of the project's basic objectives while avoiding or substantially lessening any of the project's significant effects" (CEQA Guidelines, § 15126.6(a)). A clearly written statement of objectives is required to help the lead agency develop a reasonable range of alternatives to evaluate in the EIR (CEQA Guidelines, § 15124(b)).

SANDAG, the lead agency for this Project, has provided an Updated Notice of Preparation (NOP) which raises a lot of concerns, as it includes new "updated Project objectives" which could improperly and artificially constrain the alternatives considered and the analysis of how well the alternatives meet the purported objectives**.** The original NOP from 2024 demonstrated the agency's clear objective of "improving rail service reliability by *relocating the existing railroad tracks away from the eroding coastal bluffs in Del Mar*" (emphasis added). In addition to a No Project alternative, the NOP included consideration of three inland realignments. While not labeled as a "goal" but rather as an "objective," relocation away from the tracks was the clear ultimate goal of the project.

However, the new NOP improperly frames a newly labeled "goal" of the project as "to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN rail corridor," and has removed the prior objective and any reference to relocating the existing tracks away from Del Mar's eroding coastal bluffs. Additionally, the new NOP includes a new non-tunnel "Del Mar Bluffs Double Track Reinforced Alternative Alignment" that would keep railroad tracks along the coast.

The initial NOP had a clear objective to move the tracks away from the coast. When compared with the updated NOP's new project objectives, it is clear that the new objectives are an artificially narrow pretext that could improperly lend support to the newly added coastal alternative.[1]

By attempting to "update" the objectives, the agency is improperly constraining the alternatives considered and artificially limiting their potential ability to meet the new project objectives. Courts have held that project objectives are impermissibly narrow where they effectively describe the proposed project and therefore preclude informed decision making, public participation, and other reasonably feasible alternatives (*We Advocate Through Environmental Review v. County of Siskiyou* (2022) 78 Cal.App.5th 683).

Surfrider implores the agency to return to and uphold its original goal, which is needed for both the long term efficacy of the railroad and protection of our coastal resources.

The Environmental Impact Report must consider significant effects

An EIR must study impacts across many important areas, including aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services and recreation, and transportation and traffic. Surfrider submits that many of the new Project Alternatives have potential significant impacts to the above. Additionally, the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" alternative has such significant impacts

[1] Other new purported objectives that could similarly and collectively skew the agency's alternatives analysis include:
"Minimize impacts to existing homes, businesses, tourism, and major economic generators, including the Del Mar Fairgrounds, and transportation facilities during and after construction;"
"Avoid and/or minimize impacts on biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places" was changed to, "Avoid and/or minimize negative effects, and where possible enhance biological, cultural, and recreational resources of national, state, or local significance, including publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places" (emphasis added; the agency should restore the emphasis on minimizing the negative impacts on biological, cultural, and recreational resources, as well as keep the goal of enhancing those resources, including parks and beaches); and
"Minimize impacts to existing homes, businesses, tourism, and major economic generators, including the Del Mar Fairgrounds, and transportation facilities during and after construction." (This purported objective is impermissibly narrow, and not properly an objective of the project, the – newly asserted - purpose of which is "to maintain and enhance passenger and freight service along the San Diego segment of the LOSSAN rail corridor.")

that it should be considered an alternative that is not feasible.[2] The alternative is not feasible for at least the following reasons:

1. **It violates land use planning required by California Coastal Consistency Certification No. CC-0005- 21, DMB5.** In a letter to SANDAG dated February 27, 2025, the California Coastal Commission agrees: "*In the application submittal to the Commission for CC-0005-21, SANDAG stated that it had identified the need for, and begun pursuit of, the relocation of the rail corridor off of the Del Mar Bluffs by as soon as 2035, at which point the seawalls proposed as part of the stabilization project would no longer be necessary to protect the rail line and could be removed. Shoreline structures, such as seawalls, generally result in a variety of adverse impacts on coastal resources, including on sand supply, public access and recreation, coastal views, natural landforms, and overall shoreline beach dynamics on- and off-site, ultimately resulting in the loss of beach. In light of these impacts, the Commission staff was only able to recommend concurrence, and the Commission was able to concur, because SANDAG had committed to plan for relocation of the railroad and because SANDAG has designed the seawalls to be removed after relocation was complete. This approach was also found to be consistent with the Commission's Sea Level Rise (SLR) Guidance for critical infrastructure (like the Los Angeles-San Diego-San Luis Obispo Corridor).*"

The Staff report for CC-0005-021 itself states "*SANDAG is currently in the process of planning to relocate the tracks consistent with the regional transportation plan; however, given the magnitude and complexity of that effort and outstanding funding needs for final design, environmental review, and construction, implementation of the relocation may extend beyond the target date of 2035.*"[3]

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[2] Cal. Code Regs. Tit. 14, § 15126.6 - Consideration and Discussion of Alternatives to the Proposed Project "(a) Alternatives to the Proposed Project. An EIR shall 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." … (f) Rule of reason. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

(1) Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745, 1753, fn.1)."

[3] https://documents.coastal.ca.gov/reports/2022/6/W7b/W7b-6-2022-addenda.pdf page 1.

The Staff Report also includes Condition One, "Authorization Term":

> *a. Authorization for all seawalls included in this consistency certification (including those subject to emergency repairs in 2021) shall expire thirty (30) years from the date of Commission action (i.e., June 8, 2052) or upon relocation and legal abandonment of the sections of railroad at issue in this action, whichever occurs first. No less than six months prior to the expiration of the authorization, SANDAG shall submit to the Coastal Commission a complete coastal development permit application or consistency certification to remove all of the seawalls and rip-rap included in this consistency certification and to restore the affected areas to natural conditions, except as allowed pursuant to subsection (b). If a complete permit application or consistency certification is filed before the end of the authorization period, the authorization period shall be automatically extended until the time the Commission acts on the consistency certification or permit.*
>
> *b. If relocation and legal abandonment of the rail line has not been completed in 30 years and SANDAG wishes to keep any portion of the seawalls or rip-rap in place beyond the 30 year time period, it must submit a complete, new consistency certification no less than six months prior to the expiration of the authorization. At that time, the Commission will need to consider authorization for the retention of the seawalls in light of the then-existing standard of review, including assessment of any needed mitigation for the ongoing impacts of the structure(s) and an evaluation of actions to reduce or eliminate those impacts. If a complete consistency certification is filed before the end of the authorization period, the authorization period shall be automatically extended until the time the Commission acts on the consistency certification.*"

2. **Even if SANDAG were to apply at the 30 year expiration for a new permit, nothing in conditions for CC-0005-021 authorizes the additions** of a new second track, a relocated primary track, and a trench for the new tracks as described in the Project's proposed Del Mar Bluffs Double Track Reinforced Alternative Alignment. These additions would be considered New Development under the Coastal Act. The project must comply with the Land Use authority of the Coastal Act in a new Consistency Determination and/or compliance with the Del Mar Local Coastal Program.

The Coastal Commission has already informed SANDAG in its letter dated February 27, 2025 that New Development is inconsistent with the Coastal Act in this location because the New Development will rely on shoreline protective devices such as seawalls and/or soldier piles as well as upper bluff reinforcement as described in the alternative for the Project. The letter reads (emphasis added):

"*If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21, its SLR Guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls. In addition, this alternative would add 1.5 miles of new shoreline armoring to the beach in*

southern Del Mar and, over the long-term, likely result in its permanent loss. Based on prior analyses of the significant bluff erosion and stability hazards to the existing railroad in Del Mar, ***the addition of a second track on the bluffs also appears to be inconsistent with Coastal Act Section 30253(b), which requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. As such, Commission staff have serious concerns about the regulatory implications and challenges presented by the Del Mar Double Track Reinforce Alternative and do not consider it to be viable. We therefore strongly recommend that the SANDAG Board act to not move forward this alternative for further consideration in the Draft EIR.***"

The Coastal Commission's letter also points out that the addition of 1.5 miles of seawalls would substantially alter natural landforms inconsistent with both the Coastal Act and the requirement of CEQA to have a viable alternative with mitigated impacts to Land Use Planning and Aesthetics.

The Commission also points out that the Project alternative would result in "permanent loss" of "beach" which is inconsistent with the recreational policies of Chapter 3 of the Coastal Act, the California Constitution[4], and the requirement of CEQA to have a viable alternative with mitigated impacts to Land Use Planning and Recreation.

3. **The Project's proposed Del Mar Bluffs Double Track Reinforced Alternative Alignment is inconsistent with previous CEQA analysis**, specifically the LOSSAN Programmatic EIR for the Rail Corridor, which eliminated double track in place from consideration (Record of Decision Los Angeles to San Diego, California (LOSSAN))[5].

[4] Sections 30210, 30211, 30212, 30220, 30221 of the Coastal Act and Section 4 of Article X of the California Constitution promote free and open access to the coastline and are part of the Recreation and Access policies of the Coastal Act.

[5] https://railroads.dot.gov/sites/fra.dot.gov/files/fra_net/192/LOSSAN_ROD_FINAL_2009.pdf Department of Transportation Federal Railroad Administration Record of Decision Los Angeles to San Diego, California (LOSSAN) Proposed Rail Corridor Improvements See page 10

Table 1
LOSSAN Corridor Rail Improvements Alternatives Eliminated

Alignment	Reason for Elimination							
	Construction	Environment	Incompatibility	Right of Way	Connectivity/ Accessibility	Revenue/ Ridership	Train Performance	Environmental Concerns
San Juan Capistrano								
At-grade double-tracking in existing rail alignment		P	P	P				Historic resources
Downtown Cut-and-Cover Tunnel	P		P					
Dana Point/San Clemente								
At-grade double-tracking in existing rail alignment	P		P					
Short Trench	P	P	P				S	Beach aesthetics & access
Long Trench	P	P	P	S				Beach aesthetics & access
Long Single Tunnel (no station in San Clemente)	P					S		
Inland Bypass	P	P	S		P	P	P	Natural resources
Encinitas								
At-grade double-tracking in existing rail alignment	P		P					
Long Trench	P							
Del Mar								
At-grade double-tracking in existing rail alignment	P		P	P				
Trench in Bluffs	P	P	P	S				Beach aesthetics & access
Camino del Mar Tunnel #2		P	S	P				New crossing of lagoon

Notes:
Reason: Primary (P) and Secondary (S) reasons for elimination.
Construction: Includes engineering and construction complexity, cost and sub-optimal systems operations influence (i.e., slow train speeds).
Environment: Includes any factor that can be assigned to the environmental disciplines studied as part of theEIR/EIS.
Incompatibility: Incompatibility with current or planned local land use.
Right-of-Way: Includes lack of available rights-of-way, extensive right-of-way needs, and high cost.
Connectivity/Accessibility: Includes limited connectivity with other existing or future transportation modes (highway and/or transit systems).
Ridership/Revenue: The alignment or station would have a negative effect on the revenue or ridership for the system.
Train Performance: Includes impacts to reliability, running time improvement, and ability to accommodate freight.
Environmental Concerns: Notes on specific environmental areas of concern.

As shown in the table above, the alternative was eliminated at least primarily for Environmental Reasons including “beach aesthetics and access.” This reasoning is consistent with the position of California Coastal Commission's letter of February 27, 2025.

The Programmatic EIR has more detailed language about why the double track in place option was eliminated (LOSSAN EIR 2007, page 78)[6].

> "*An at-grade second track along the coastal bluffs in Del Mar would compound existing barrier and safety factors noted above for other locations. In addition, since the bluffs are continually eroding, it was apparent that any double-tracking alternative in this location*

6 https://railroads.dot.gov/sites/fra.dot.gov/files/2023-10/2.2.11%20LOSSAN%20Programmatic%20EIR-EIS%20%282007%29_PDFa.pdf

would require significant excavation work to stabilize the bluff-top. Stabilization would also require structures that would create substantial visual impacts and likely require significant on-going maintenance efforts to address erosion and drainage concerns. Therefore, this option was eliminated due to high construction and operational impacts and costs."

The Programmatic EIR was cited in the Coastal Commission's Findings and Declarations in Certification of Federal Consistency Determination CC-020-10, Construction of Del Mar Bluffs Railroad Track Stabilization Project 3 (DMB3). As the Commission found, DMB3 would not lead to double tracking along the Del Mar Bluffs or create a "hurdle" for moving the tracks inland[7].

"*With these commitments, the project can be constructed without adversely affecting the stability of the bluffs, the public beach at the foot of the bluffs, or railroad operations through this area. In addition, project implementation will not lead to double-tracking of the railroad through the Del Mar Bluffs area or serve as a hurdle to the eventual inland relocation of the track away from the bluffs, as SANDAG reported that the 2007 Final LOSSAN Program EIR/EIS eliminated any double track alternative along the Del Mar Bluffs. The project is necessary to protect an existing facility (the railroad tracks) from bluff erosion, is the least environmentally damaging feasible alternative for an interim (20 years) approach, and provides for future Commission review of future project elements or current elements that may become exposed over time. The project is consistent with the shoreline structures and geologic hazards policies of the California Coastal Management Program (CCMP)(Coastal Act Sections 30235 and 30253).*"

4. **SANDAG's latest NOP contradicts their own previous assessments.** For example, in pages 69-70 of the 2023 Alignment Alternatives study (emphasis added):

"*3.7 Del Mar Bluffs Alternative*

At a PDT meeting in March 2021, NCTD made a request to look at a double track alignment that would stay on the Del Mar Bluffs to show if it could be considered a viable alternative. ...

A 110-miles per hour alignment on the bluffs would result in more significant impacts compared with the other conceptual alternatives, where the alignments would move inland. In addition, retaining the alignment on the bluffs does not address the current safety risk presently being addressed with multiple bluff stabilization projects, which would have the potential to continue in perpetuity to maintain safe operations. These impacts combined with the direction from CCC to relocate the track off the bluffs leads to the conclusion that an alternative double track alignment along the bluffs is not a desirable solution. "

[7] https://documents.coastal.ca.gov/reports/2010/10/F6b-10-2010.pdf Staff Report in Findings and Declarations in Certification of Federal Consistency Determination CC-020-10 at page 15.

Additionally, pages 4-47 to 4-48 of the SANDAG February 2025 Value Analysis Report[8] state this alternative is not consistent with previous approvals and requires CCC approval and coordination:

> "*4.1.12 VA Alternative Concept No. 12 (IOC-04)*
>
> *Stabilize bluffs and widen existing alignment to accommodate a second track*
>
> *Estimated Cost: $1.9 to $2.5 billion*
>
> *Description of Alternative Concept: The intent of this alternative concept is to maintain the location of the existing rail alignment and add a second track to the east of the existing tracks within the railroad right-of-way. The second track would pass under the existing Torrey Pines Overhead bridge.*
>
> *...*
>
> *Discussion of Additional Considerations:*
>
> *This alternative concept is not consistent with prior approvals that require the tracks to be removed from the bluffs and sea walls to be removed. Additionally, CCC staff have expressed serious concerns with a concept explored in the past that would maintain the location of the existing rail alignment on the bluffs as it would hamper efforts to plan for sea level rise and erosion. Therefore, coordination and approval by the CCC would be required for the addition of a second track, the installation of new sea walls, and additional retaining structure along the Del Mar Bluffs. Specifically, a new federal consistency determination would need to be submitted to CCC for its concurrence*."

Additionally, at the California Coastal Commission meeting on June 8, 2022 in Del Mar, SANDAG promised to remove the track off the bluff in seeking approval of Consistency Certification No. CC-0005- 21, DMB5 consistent with the eventual conditions of the issued determination. The following is a transcription of testimony from applicant SANDAG's Chief Executive Officer Hasan Ikhrata for Consistency Certification No. CC-0005- 21, DMB5 (emphasis added):

> "*Jack and his team and our staff have been working for almost 3 years to get to this point. You know, I got to know Jack, and he's a straight shooter, he's a tough negotiator, but I really do appreciate the dialogue in conversation we have. You know* ***I said this to you when you came to Chula Vista****, that we're going to do everything possible from SANDAG's standpoint to make sure this corridor is safe.* ***Environmental sustainability is really paramount to us. And I also told you at that time that we're gonna start***

[8] https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/featured-p[…]bilization/lossan-sdsvdt-alternatives-analysis-2023-09-01.pdf

the process, removing the track off the bluff. And I made that promise to people of San Diego, to my board and since then we completed the $3 million study, corridor management study, almost complete*, to recommend two alternatives.* ***And now we're at the stage where we're ready to start the environmental and design work that's gonna cost about $300 million to look at how we move that rail off of the bluff. So, we're committing to the long-term solution.*** *In the meanwhile, we are doing that, we work with your staff to figure out how do we make sure it's safe, stabilized and also move forward with environmentally care. So we have a history."* (Testimony audio and video available here as well as on the Coastal Commission website at https://cal-span.org/meeting/ccc_20220608/).

5. **The $300 million in state funding to complete the environmental phase of this project was proffered on relocation and not a double track in place project**. SANDAG accepted $300m in State of California General Fund monies in the Transit and Intercity Rail Capital Program for the advancement of the San Dieguito to Sorrento Valley Double Track project (Capital Improvement Program No. 1239823). It is not permissible to use this money, which is funding this Draft EIR, to study leaving the tracks along Del Mar's bluffs.

The SANDAG Board of Directors voted to accept this funding at their September 9, 2022 Board meeting. The Staff Report that accompanied this Item explains the Project Scope as follows: *"Completion of Project Approval and Environmental Document (PA&ED) phase* ***re-aligning the LOSSAN rail corridor away from the Del Mar Bluffs with a double track system,*** *and the advancement of the design and right-of-way phases* (emphasis added)."[9] Similar language can be found in a December 2022 Memorandum to the California Transportation Commission, which states that the initial $152m allocation to SANDAG must be used for "completion of the environmental phase for a project that will cover the realignment of railroad tracks facing failure due to erosion into a tunnel that will cut through Del Mar Hill."[10]

Additionally, the CA Dept of Transportation added language governing how the $300m must be spent to their Master Agreement with SANDAG (Program Supplement 11SANDAGPS-04).[11] This document, signed by both CalSTA's Division of Rail and Mass Transportation Chief and SANDAG's Chief Financial Officer, states the following as its Project Summary, and goes on to detail over multiple pages that the money must be used to study realignment of the LOSSAN rail corridor away from the Del Mar Bluffs:

> *PROJECT SUMMARY: This program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar.*

[9] Staff Report Item 1: LOSSAN Realignment, Sept 9 2020
[10] Memorandum for Dec 8-9, 2022 CTC meeting
[11] San Diego Association of Governments Program Supplement 11SANDAGPS-04

The stated project scope of the $300m in state funding rests on the foundational infeasibility of double tracking in place due to the aforementioned irreversible negative impacts on the beach and coastal aesthetics, and also the unending battle of maintaining the tracks against a rapidly encroaching ocean and eroding bluffs.

Furthermore and based on the evidence above, Surfrider has concluded that studying the Del Mar Double Track Reinforced Alternative in this Draft EIR constitutes an improper use of state funds. Moving forward with studying this alternative could expose SANDAG to legal liability, and could jeopardize the remainder of the $300 funding and/or compromise future state funding towards completion of the SDLRR Project.

The EIR must consider less harmful alternatives

Fortunately, the Updated NOP proposes three alternative alignments that can feasibly achieve the SDLRR Project's goals in accordance with CEQA: the San Dieguito Bridge to I-5 Alternative Alignment, the Under Crest Canyon Alternative Alignment, and the Under Camino Del Mar Alternative Alignment. Surfrider supports further study of these alternatives, all of which can be pursued in conformance with SANDAG's previous commitments *including* Coastal Commission Consistency Certifications, the Coastal Act, the state funding that is financing this environmental review, and the reality that double tracking in place would destroy almost 2 miles of irreplaceable bluffs and beach *while* necessitating an unending battle against Mother Nature in the form of an encroaching ocean upon rapidly eroding bluffs.

The EIR must consider mitigation measures

Below is a summary of some of the mitigation measures that must be considered in this Draft EIR:

- When the train is relocated as required by CEQA, the Coastal Act, and Consistency Certification No. CC-0005- 21, DMBS5, mitigation measures for the Project should include that the temporary seawalls and soldier piles and other shoreline protective devices are removed since they are no longer required, per Section 30235 of the Coastal Act, to protect an existing structure from erosion. Instead, additional shoreline accesses should be provided. The existing right of way should be dedicated for public access or deeded to Del Mar and/or CA State Parks for such purposes. SANDAG has previously agreed that removal of soldier piles was feasible and required under previous Coastal Commission Federal Consistency Determinations as shown below[12]:

"Can the soldier pilings be removed if/when the rail line is relocated inland?

[SANDAG's answer to Coastal Commission] Yes, the soldier piles could be removed if and when the rail line is relocated inland. Note that as part of the conditions for CC-048-04,

[12] https://documents.coastal.ca.gov/reports/2010/10/F6b-10-2010.pdf Staff Report in Findings and Declarations in Certification of Federal Consistency Determination CC-020-10 at page 13.

SANDAG and NCTD agreed that when the environmental document for the removal of the tracks along the Del Mar Bluffs is prepared, as a portion of the project, the document will examine the removal of all visible concrete piling and in-fill walls."

● Should the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" remain under consideration, it would require considerable mitigation and ongoing maintenance. As is evident by the at least 6 SANDAG Stabilization projects in Del Mar, the area is subject to continued erosion and sea level rise impacts. Considerable sand nourishment projects to offset the impact of the continued presence of the seawalls and soldier piles required to stabilize the bluffs would be required in this Alternative. Nourishment via excavated bluff material from trench excavation would not be sufficient for several reasons: first, it would not be equal to the overall amount of sand that the bluffs would naturally provide over time via natural erosion. Additional nourishment via offshore dredging or from land-based sources would be required. More importantly, the excavated material would not be sufficient mitigation for additional beach space that bluff erosion would create over time, were the train to be removed from the bluffs so that the natural coastal process of landward beach migration could occur. Even with additional nourishment from offshore or another source, there is no equal mitigation for this permanent loss of future beach. The erosive forces of sea level rise would ultimately render sand nourishment ineffectual if the bluff line is artificially held in place. It is indisputable that the beach will be lost sooner under this alternative than those which propose moving the train elsewhere. Furthermore, sand nourishment has its own environmental consequences, including but not limited to the burial of reefs like the surfing reef at 8th Street, and the other reefs. Sand nourishment would also be upcoast of the littoral drift towards Penasquitos Lagoon, and could cause the lagoon mouth to be blocked, requiring additional dredging.

● The Project Alternative "Del Mar Bluffs Double Track Reinforced Alternative Alignment" must include costs and the impacts associated with ongoing mitigation as described, including the fact that the beach loss under this alternative cannot be fully mitigated. The costs and proposed mitigation must also include maintenance and repairs to seawalls and other similarly include shoreline protective devices, which will surely mount over time as sea levels rise into the 21st century. Would it even be feasible to maintain the seawalls after 2 or more feet of sea level rise, at which point a dry sand beach may no longer exist upon which crews and machinery may need to access in order to do repairs? Such eventualities must be considered and studied, including the potential that the Del Mar Double Track Reinforced Alternative would have a limited project life, thereby making eventual relocation away from the bluffs necessary at a future date.

● The Project Alternative "Del Mar Bluffs Double Track Reinforced Alternative Alignment" and "Under Camino Del Mar Alternative Alignment" include South Portals that impact the Penasquitos Lagoon. From the Updated NOP, pages 13-14:

"*existing railroad alignment within Los Peñasquitos Lagoon would be double tracked, which would require raising and widening the existing berm in the lagoon to address flooding and sea level rise projections*"

Filling precious lagoon resources and the additional impacts on wildlife during construction would have potentially unmitigated impacts.

Conclusion

Surfrider Foundation appreciates the opportunity to provide these comments. We urge SANDAG to remove the Del Mar Double Track Reinforced Alternative from consideration for the reasons explained in these scoping comments. Should you be unable to remove this non-tunnel alternative from consideration, we urge SANDAG to complete a full, extensive review of the environmental impacts of this alternative, including but not limited to mitigation for loss of beach and public access to the beach, whether such mitigation is even possible at this location considering the irreplaceable nature of coastal resources, and the as-of-yet unexplored mounting costs of unending maintenance and repair (including but not limited to sand nourishment) of the required stabilization elements to maintain a railroad atop eroding bluffs that will be subject to increasing wave runup *and* storm runoff due to climate change and sea level rise.

Sincerely,

Jim Jaffee and Kristin Brinner
Beach Preservation Leads
Surfrider Foundation San Diego County Chapter
beachpres@sandiego.surfrider.org

Mitch Silverstein
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SURFRIDER FOUNDATION
SAN DIEGO COUNTY

July 19, 2024

Delivered via email

To: SANDAG
401 B Street, Suite 800
San Diego, CA 92101
Attn: Tim Pesce

Re: Notice of Preparation of a Draft Environmental Impact Report for the San Diego-Los Angeles-San Diego-San Luis Obispo Rail Realignment Project located in the cities of Solana Beach, Del Mar, and San Diego, California

To whom it may concern,

The Surfrider Foundation is a nonprofit grassroots organization dedicated to the protection and enjoyment of our world's ocean, waves, and beaches, for all people, through a powerful activist network. Thank you for the opportunity to comment on this project. We have been actively involved in the planning for the rail realignment for over ten years, first serving on Del Mar's Sea Level Rise Technical Advisory Committee that led to sea level rise discussions related to Del Mar's Local Coastal Program Update, and more recently as a member of the Los Angeles – San Diego – San Luis Obispo (LOSSAN) Regional Rail Corridor Working Group and the San Diego Shoreline Preservation Committee.

We have provided extensive comments to SANDAG, the city of Del Mar, and the California Coastal Commission about the extreme impacts the continuing presence of the railroad tracks and the subsequent Del Mar Bluffs Stabilization projects have inflicted on the beaches of Del Mar and the need to relocate the tracks in light of Sea Level Rise (SLR). This includes the following documents:

- September 30, 2018: Item 12: Comments to Del Mar City Council on Del Mar's Plan to Address Projected Sea Level Rise, Flooding, and Erosion, including Local Coastal Program Amendments[1]
- June 2, 2021: Comments to the California Coastal Commission regarding City of

[1] Appendix A, attached

Del Mar Major Amendment LCP-6-DMR-20-0005-1[2]

- July 26 2021: Comments to Del Mar City Council on Item 2, SANDAG's presentation to Del Mar City council concerning Del Mar Bluff Stabilization Project[3]
- September 20 2021: Comments to Del Mar City Council on Item 2 SANDAG's presentation to Del Mar City council concerning Del Mar Bluff Stabilization Project[4]
- June 3, 2022: Comments to the California Coastal Commission on Item W7b, CC-0005-2, Coastal Commission Federal Consistency Determination concerning Del Mar Bluff Stabilization Project[5]

Our goal has always been to see SANDAG and Del Mar plan for SLR to protect coastal access, coastal recreation, and marine resources in the most effective way, given current conditions affecting the safety and operability of the railroad. Relocation of the railroad tracks provides an extremely rare and important opportunity to allow space for Del Mar's coastline to migrate landward as sea levels rise. It will also secure public recreation, viewing, and access opportunities along the former rail corridor in the future. If successfully managed, this project will be a nationally significant case study, representing one step along an adaptation pathway towards managed retreat of critical infrastructure and restoration of an otherwise highly developed area on an eroding shoreline. The site is unique in San Diego County as one of the few areas along coastal bluffs where existing development would no longer be threatened once the rail is relocated.

The issues of importance to us when examining any project alternatives as part of the upcoming Draft Environmental Impact Report (DEIR) include:

- Developing a timeline and process for providing new access on Del Mar's bluff, as well as removal of the seawalls currently under construction as part of Del Mar Bluff Stabilization Project #5 (DMB5), once the tracks have been relocated. In addition, removal of both older existing and future planned stabilization structures must also be in the timeline. The timeline must include actionable demolition and construction milestones with planned funding and deadlines. This is required under CEQA as the removal of structures and improved access

[2] Appendix B, attached
[3] Appendix C, attached
[4] Appendix D, attached
[5] Appendix E, attached

are project goals. In addition, the removal and access were mitigation measures in previous CEQA and/or Coastal Commission actions by SANDAG.

- The impacts of the potential undermining and/or flooding of the tunnels and/or floodwalls by seawater intrusion including under various sea level rise scenarios must be studied. Impacts of seawater intrusion from rising sea levels include direct intrusion, rising water tables due to pressure from sea level rise and an increase in wave overtopping or tidal impacts. In the case of tunnels under lagoons, rising water tables could impact the planned project alternatives. Similarly, floodwalls may be impacted by rising sea levels and the impacts on groundwater. The figure below shows the potential impact.

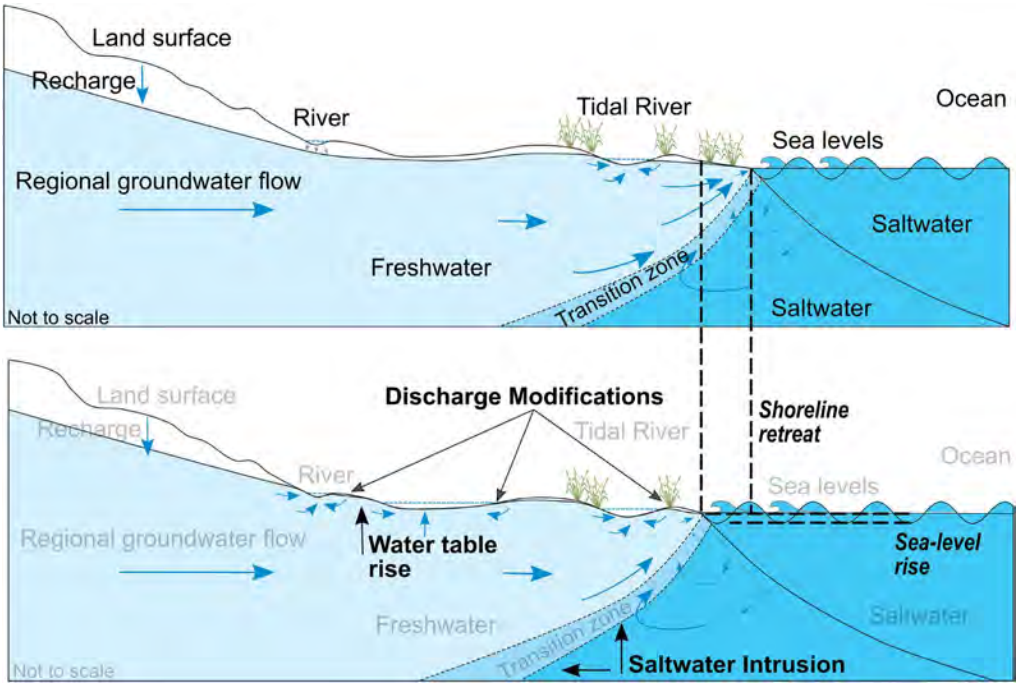

Figure 1: Comparison between current water levels (top) in the low-lying zone and potential changes (saltwater intrusion, levels/water table rise and discharge modifications) due to climate change induced sea-level rise (SLR) in coastal unconfined aquifers and shoreline retreat impacts on coastal shallow groundwater (bottom) with landward encroachment resulting in an eroded coastline, readjustment of the shoreline and bottom profile under SLR.[6]

[6] Figure 1 and caption are copied from Bosserelle, Amandine L., Leanne K. Morgan, and Matthew W. Hughes. "Groundwater rise and associated flooding in coastal settlements due to sea-level rise: a review of processes and methods." Earth's Future 10.7 (2022): e2021EF002580. https://agupubs.onlinelibrary.wiley.com/doi/full/10.1029/2021EF002580#:~:text=Groundwater%20can%20co

- The impacts of the project alternatives on beach access and automotive, pedestrian, train, and bicycle traffic during construction must be studied and eliminated or mitigated as part of the project and DEIR. For example some alternatives would close or alter bicycle and pedestrian traffic on the Sorrento Valley Road Class 1 bike/pedestrian trail during construction. Alternative A may impact coastal bicycle and pedestrian access in Solana Beach during construction These impacts must be studied and eliminated. In both of these areas, the only automobile-free bike lanes will potentially be impacted by project alternatives. CEQA requires study and mitigation of these impacts. These impacts are significant given the potential duration of construction.

- Long term impacts to coastal access must be studied and eliminated or mitigated as part of the DEIR and project. SANDAG has received approval and funding for a double tracking and events platform at the Del Mar racetrack. The Coastal Commission held a Federal Consistency Hearing on the project on June 7, 2017. As part of the consistency findings, a special events platform would provide improved coastal access by rail to Del Mar beaches and could further be enhanced. Alternative A would potentially eliminate this improved access during construction and long term. This impact must be studied. The following excerpt is from the Staff Report by the Coastal Commission on the federal Consistency determination[7]:

> SANDAG states that the new double-track railroad bridge over the San Dieguito River is designed to accommodate a future pedestrian trail undercrossing of the railroad tracks along the south bank of the river. This trail is not an element of the subject consistency certification, but rather is a project proposed and supported by other agencies, including the San Dieguito River Park Joint Powers Authority (JPA), and would provide an alternate means of pedestrian and bicycle access to the shoreline from inland locations. However, until this future trail project is constructed, rail passengers could exit the proposed railroad platforms and walk across the Fairgrounds to Jimmy Durante Boulevard, which crosses the San Dieguito River and intersects an existing

ntribute%20to%20surface,rises%20and%20flooding%20risk%20increases.

[7] https://documents.coastal.ca.gov/reports/2017/6/w14a/w14a-6-2017-report.pdf June 2017 CC-0001-17 (San Diego Association of Governments) Consistency Certification by SANDAG for San Dieguito River railroad bridge replacement, double-track extension, and Del Mar Fairgrounds special events rail passenger platform, Cities of Solana Beach and Del Mar, San Diego County. (LS-SF)

informal pedestrian pathway along the south side of the river (Exhibit 4). This path continues across the existing railroad track (notwithstanding that this is an unpermitted/illegal crossing of the railroad right-of-way) to Camino Del Mar and the shoreline at the mouth of the river. After construction of the proposed double-track bridge, the existing pathway would pass underneath the bridge, eliminating the current at-grade and unsafe crossing of the trackway. However, SANDAG notes in its consistency certification that currently there is no formal public access from the location of the proposed passenger rail platforms though Fairgrounds property to Jimmy Durante Boulevard. A proposal for such access across the Fairgrounds property is not an element of the proposed project or of this consistency certification. However, the consistency certification does reference the conceptual plan for the trail along the south side of the river:

> *A future trail, Reach the Beach Trail, is planned to be located adjacent to the Fairgrounds and Camino Del Mar on both sides of the railroad track, and that would cross the tracks. The planned trail is identified on the San Dieguito River Valley Conservancy trail plan. As identified on the San Dieguito River Valley Conservancy trail map, this future trail is planned to traverse under the railroad tracks to allow access to the beach from the east; however, the trail is only conceptual at this stage and there are no easements for the trail. In addition, the planned new San Dieguito River Railroad Bridge is being designed to accommodate a trail undercrossing of the railroad tracks along the south edge of the San Diego Dieguito River. The current design facilitates trail use below the railroad bridge on the south side of the San Dieguito River. In addition, the project includes a culvert below the railroad tracks for the Stevens Creek realignment that could allow development of a future trail (by others) below the tracks [on the north side of the river, near Via De La Valle]. Therefore, implementation of the Proposed Action would not preclude the future construction (by others) of the future Reach the Beach Trail.*

The Commission agrees with SANDAG that the proposed double-track project would not adversely affect existing public access and recreational opportunities in the project area. In fact, project elements (double-tracking, the special events platforms, and the bridge across the existing pathway along the south side of the river) would improve public access in the project area. After completion of the project, the general public would be able to take the train to the Del Mar Fairgrounds platform and either enter the fairgrounds to attend special events or find their way to the shoreline via the fairgrounds, Jimmy Durante Boulevard, and the informal pathway on the south side of the San Dieguito River.

While the project does not include a public trail from the passenger platforms to the shoreline, the Commission has long advocated planning for and

development of a direct pedestrian and bicycle pathway from the platforms to the shoreline at the mouth of the San Dieguito River. Such a path could lead to the south side of the river (as described above or via a stand-alone bridge across the river) or could head north from the platforms, pass underneath the trackway through the Stevens Creek culvert (which is designed in part to not preclude use as a pedestrian and bicycle pathway underneath the trackway), and cross Camino Del Mar to the shoreline (Exhibit 4). Either pathway would require the agency sponsoring/proposing the trail to purchase property and/or obtain easements from several property owners, including the North County Transit District (NCTD), who owns the railroad right-of-way. While this effort is beyond the scope of the subject double-track project proposed by SANDAG, the Commission nevertheless continues to strongly support ongoing efforts to develop a direct route from the proposed rail passenger platforms to the beach for foot and bike traffic. Such a trail would allow users of the rail platform to not only enjoy direct access to the Del Mar Fairgrounds for special events during the June-November time period, but would also [sic (allow?)] users to directly access the shoreline during the peak summer recreation season on those days when the platforms are open. SANDAG reported to the Commission staff that

> *: . . . the project design is sensitive to the possibility that a trail may be pursued by others in the future, and have thus ensured that the design not preclude trail access, and that the design allows for future development of a trail(s) . . . SANDAG would continue coordination with the City of Del Mar and the JPA to support efforts for a future trail separately from the LOSSAN project.*

The impact of Alternative A and other alternatives on the enhanced coastal access planned for the San Dieguito Double Track and Special Events Platform must be studied and eliminated or mitigated such that the new coastal access proposed is not eliminated. This new coastal access would be one of closest to the shoreline on the entire San Diego rail corridor and could be eliminated in the newer tunnel project. This must not be permitted to occur.

- Comprehensive study of the climate impacts of the rail relocation including the reductions in greenhouse gas (GHG) emissions and train travel times, as well as project timelines to most efficiently and effectively complete the rail relocation.

- Inclusion of the negative environmental impacts of DMB5 on beach access (Recreation), natural sand replenishment, habitat (Biological Resources), and Aesthetics in the Draft Environmental Impact Report (DEIR). This could mean, among other things, giving special attention to the estimated project timeline

for each proposed alternative. The sooner realignment is complete, the sooner the DMB5 seawalls can come down. Excluding other factors, the proposed alternative that results in the most efficient realignment should be deemed less environmentally damaging because it allows for the quickest restoration of the public beach.

We are concerned that Alternative A, one of the three project alternatives to be examined in the DEIR has not been examined or analyzed in any previous alignment studies carried out by SANDAG. Alternative A begins in Solana Beach and requires both a Cut-and-Cover tunnel by Via de La Valle and a much longer tunnel under the San Dieguito Lagoon to reach the I-5. Many possible railroad track realignments have been extensively studied by SANDAG since at least 2017, beginning with SANDAG's 2017 conceptual alignment study[8], followed by the 2023 San Dieguito to Sorrento Valley Double Track Del Mar Tunnels Alternatives Analysis.[9] The 2017 report analyzed 5 possible routes, including two Interstate 5 (I-5) alternatives, but neither of the I-5 alignments started in Solana Beach and went under the San Dieguito Lagoon. Likewise the 2023 alternatives analysis examined 10 possible alignments, including an I-5 alignment, but similarly this I-5 alignment did not involve any tunnels under the San Dieguito Lagoon.

Alternative A involves the longest route and therefore the most construction. We assume a longer route will result in increased GHG emissions both during construction and per train ride once construction is completed. The long stretch of cut and cover tunneling through downtown Solana Beach would inevitably disrupt traffic, aesthetics, and public services in an already congested area that is adjacent to public beach access. Additionally, the increased costs and construction requirements of this alternative leads us to assume it would take the longest to complete (it would also be the most difficult to fully fund, which could also lengthen the process). This concerns Surfrider because our main interest is in seeing the most expeditious realignment possible, so that Del Mar's bluffs and beaches can be restored to their natural state and again fully enjoyed by the public.

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8 https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/featured-projects/lossan-rail-improvements-del-mar-bluffs/del-mar-bluffs-stabilization/alignment-alternatives-and-environmental-constraints-study-2017-2023-09-08.pdf

9 https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/featured-projects/lossan-rail-improvements-del-mar-bluffs/del-mar-bluffs-stabilization/lossan-sdsvdt-alternatives-analysis-2023-09-01.pdf

Both the aforementioned concerns and the lack of information on Alternative A makes it difficult to determine whether this Alternative is feasible and reasonable, especially when compared to the thorough previous studies that have led up to Alternatives B and C.

Thank you for considering our comments. We look forward to reviewing the DEIR once completed.

Sincerely,

Kristin Brinner & Jim Jaffee
Residents of Solana Beach
Co-Leads of the Beach Preservation Committee
San Diego County Chapter, Surfrider Foundation

Mitch Silverstein
Policy Manager
San Diego County Chapter, Surfrider Foundation

APPENDIX A

September 30, 2018: Item 12: Comments to Del Mar City Council on Del Mar's Plan to Address Projected Sea Level Rise, Flooding, and Erosion, including Local Coastal Program Amendments

Phone: 858.800.2282 | info@sandiego.surfridersd.org | surfridersd.org
3900 Cleveland Ave., Ste B, San Diego, CA 92103

September 30, 2018

Delivered via email

To: Amanda Lee, MCP
Principal Planner/Long Range Planning Manager
Planning and Community Development
City of Del Mar

Re: Item 12 - Del Mar's Plan to Address Projected Sea Level Rise, Flooding, and Erosion, including Local Coastal Program Amendments (LCPA 16-005 and 18-002) and Zone Code Amendment (ZA 16-008)

Dear Ms. Lee,

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches for all people, through a powerful activist network. The Surfrider Foundation has over 250,000 members, activists and supporters and 83 chapters in the United States. With nearly 70 miles of coastline to protect, the Surfrider Foundation San Diego County Chapter is one of the largest and most active chapters in the world. We are a grassroots organization, which means the people working to protect our local ocean, waves and beaches are volunteers who care about the San Diego County coastline and want to make a difference. In the spirit of the voters in 1972 who voted to establish the Coastal Commission, as well as the Coastal Act of 1976 which extended the Coastal Commission's authority indefinitely, we are submit these comments on behalf of the beach-going public, whose voice has largely not been heard during these proceedings.

Background

We have previously submitted comments to the City Council and the Planning Commission and will summarize those comments here.

Our April 9, 2018 and May 21, 2018 letters to the City Council addressed the Sea Level Rise Adaptation Plan:

- Removal of managed retreat as an option from the Adaptation Plan was a mistake. Managed retreat, is legal and supported by the Coastal Act, and it has

already been practiced in Del Mar as part of the Beach Preservation Initiative (BPI).
- Given the landward migration of the high tide line due to sea level rise, Del Mar cannot find maintaining seawalls in the present location as consistent with the Coastal Act and the Del Mar BPI.
- The Draft Sedimentation Management Plan raises serious doubts that there will be adequate sand resources to sustain nourishment of Del Mar, northern beaches in Solana Beach and Encinitas. and Torrey Pines to the south.

Our August 14, 2018 letter to the Planning Commission addressed proposed amendments to the Land Use Plan (LUP) :

- Sand replenishment is not a panacea, and should not be so heavily relied on in the city's long-term planning for higher Sea Level Rise (SLR) scenarios.
- Managed retreat is supported by the Coastal Commission, the Coastal Act, and Del Mar's BPI.
- Proposed amendments discuss relocation of public infrastructure, but ignore relocation of private property. How can private property remain in place when roads, sewers, electrical lines, and other resources are being removed?
- Rip rap located in the Shoreline Protection Area (SPA) is currently in violation of the BPI. Unless the city deals with either removal of non-conforming structures via enforcement or an Local Coastal Program (LCP) amendment, the city may be subject to litigation.
- The BPI allows that protective structures may be developed on *private* property, landward of the SPA line. It does not grant anyone the right to a protective structure on *public* property. Shore protection does not stop the formation of public trust land behind it if the shore protection not been present. As sea level rises and the high tide line moves landward, protective structures previously allowed per the BPI will eventually be on public property and subject to removal.

Our September 11, 2018 letter to the Planning Commission addressed the staff report as well as proposed amendments to the Implementing Ordinances (IO):

- The staff report describing changes states the following: "*Clarified that the existing required waiver (for properties with coastal bluffs) does not preclude an owner from applying for future shoreline protection permits.*" For any new development, these changes are directly in conflict with Section 30253 of the Coastal Act, which states that new development for properties on the coastal bluffs does not have a right to future shoreline protection.
- We disagreed with the staff's assertion that "*The Coastal Commission may only reject the City's zoning code amendments if they do not conform with, or are*

inadequate to carry out the existing certified Land Use Plan." The standard of review for any proposed amendments is the Coastal Act.

- We requested that any proposed amendments to the LCP or its Implementing Ordinances be unequivocal that future shoreline protection is in no way allowed for new development.
- We requested that the setback requirements in the Implementing Ordinances be strengthened. In addition to a minimum 40-foot setback, setback rules should also include requirements for maintaining safety over the 75-year economic lifetime. The setback must include SLR and a factor safety of 1.5.
- We requested that 30.55.060: C be changed as follows: . *In accordance with the California Public Resources Code Section 30010, this Chapter is not intended, and shall not be construed as authorizing any ~~public agency~~* ***agent*** *acting pursuant to this Chapter to exercise their power to grant or deny a permit in a manner which will take or damage private property for public use,* ***or public property for private use,*** *without payment of just compensation therefore. This section is not intended to increase or decrease the rights of any owner of property under the Constitution of the State of California or the United States.*
- We requested that beach nourishment not be taken into consideration when determining risk associated with permitting (section 30.55.060).

We request that our previous comments included in these letters and public comment be incorporated by reference. We also want to remind the City Council of a key section of the Coastal Act. Section 30253 states:

> *New development shall do all of the following…*
> *(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
> *(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area* ***or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs****.*

Per 30253, any new development for properties on the coastal bluffs does not have a right to future shoreline protection. No proposed amendment to the LCP may violate this principle; otherwise, the proposed amendments are in violation of the Coastal Act and therefore should be considered invalid.

Setback rules must be strengthened

We are concerned that some of the amendments to the Local Coastal Program (LCP) are weakening protection of the beaches. The Public Trust provides that tide and submerged lands and are to be held in trust by the State for the benefit of the people of California. Most importantly, the language in the proposed LCPA will have grave

consequences for several key initiatives that are critical to the City of Del Mar, San Diego County, the State of California, Interstate Commerce, the National Defense, and beach visitors to the area.

Specifically, the proposed LCPA weakens setback rules required by the Coastal Act to prevent shoreline armoring by seawalls and other similar devices. The weakening of these setback rules may prevent relocation of the railroad tracks and allow the proposed Zephyr Del Mar Resort to be built in a more seaward location. Both situations defy the Coastal Act's setback rules and increase risk to public infrastructure and property.

The Draft LCPA Implementing Ordinances should strengthen the intent of the voters under the BPI. The proposed amendments make reference to strengthening setbacks in the LUP, but do not provide the corresponding strengthened language in the Implementing Ordinances.

Policy III-9 of the LUP requires an analysis of adequate setbacks:

> "Policies:
>
> III-9 Require all new development located on a coastal bluff or vulnerable slope to be setback from the coastal bluff edge a sufficient distance to ensure stability, ensure that it will not be endangered by erosion, and to avoid the need for protective devices during the economic life of the structure (minimum 75 years). Such setbacks must take into consideration projected long-term bluff retreat over the next 75 years, as well as slope stability. To assure stability, the development should maintain a minimum factor of safety of 1.5 against land sliding for the economic life of the structure. ***Alternative stability requirements may be approved to the satisfaction of the City Engineer and Building Official if an equivalent factor of safety is demonstrated.***".

The bolded last sentence was added at the Planning Commission and should be further amended to include at least two third-party peer reviews to test the veracity of the proposed factor of safety (for litigation avoidance), and subject to public hearing.

Despite the language in Policy III-9 of the LUP, there no follow through in the Implementing Ordinances. As proposed, the Implementing Ordinances in 30.55.050 would leave ambiguous any setback requirement above the 40 feet and the required protection of the North Bluff.

> "30.55.050 Development Regulations for the Coastal Bluff Overlay Zone
>
> A. Proposed development shall be sited and designed to avoid impacts from erosion hazards over the economic life of the development (minimum 75 years) in accordance with the following:

1. A minimum 40-foot setback shall be provided between proposed development (including supporting structures and foundations) and a coastal bluff edge, ***except where otherwise provided below***:

It should be clarified that the "where otherwise provided" clause includes requiring a determination of the need for shoreline protection and the prohibition of such protection particularly for the North Bluff. Previous versions of the Ordinance had such inclusions.

Protection of North Bluffs should not be weakened

The BPI specifically directed that the bluffs in Del Mar are to be kept in natural condition and not altered. The bluff areas were broken into two distinct areas. The two areas are the North Bluff, the location of the proposed Del Mar Resort, and the South Bluff Area, mainly backed by the railroad right of way.

Construction of the Zephyr Resort, above the North Bluffs, at a more seaward location jeopardizes coastal views in Solana Beach, visual attributes of the shoreline, and the proposed park area on the western portion of the property, in addition to as lateral and vertical shoreline access. Even if the rezoning to allow the resort were not adopted, the current residential zoning permits residential development at this relatively pristine site. New residential development could also be located further seaward and similarly jeopardize both coastal and residential views and coastal access.

The policies voted on by the citizens of Del Mar require that development on the North Bluff be set back by adequate distances to accommodate natural erosion over the life of the structure. The BPI Guidelines specifically prohibit any alteration of the bluff face or toe as well:

> "Section 16. North Bluff Section 16. Guideline: It is the general policy of the City to accommodate natural bluff erosion in the North Bluff area. To this end, the placement of rip rap, seawalls, sealing of sea caves, etc., shall, generally, not be permitted. ***Rather, it shall be the obligation of the property owner to setback any proposed development on the top of the bluff a sufficient distance to avoid the need for any bluff face or beach stabilization measures***. With respect to protection of existing principle bluff top development any stabilization or other reinforcement shall be installed from the top of the bluff and anchored down, or back, as necessary to provide sufficient protection. ***Alteration of the bluff face, the bluff toe, or the beach shall not be permitted.*** In addition, any proposed project shall require the submittal of a signed certification by a licensed Geotechnical Engineer or Coastal Engineer certifying that the proposed project will not have an adverse impact to shoreline processes."

> Source: Implementation Guidelines Measure D – Beach Preservation Initiative February 1, 1993 (***Emphasis added).***

The proposed definition of 'existing development' in the amendments to the Implementing Ordinances is directly in conflict with the intent of the voter-approved BPI as well as the Coastal Act.

> Implementing Ordinance section 30.55.030 and 30.56.030: "Existing development shall mean any structure or development that was lawfully established, altered, and maintained pursuant to the Del Mar Municipal Code (or preceding San Diego County ordinances)."

Defining "existing development" as proposed above would conflict with the intent of the voter-approved BPI as well as the Coastal Act.

This new definition potentially allows future development to be classified as Existing Development on the North Bluff. This development may then be permitted and preclude the intended prohibition of the BPI and Section 30253 of the Coastal Act. The BPI is clear in its intent that ***it shall be the obligation of the property owner to setback any proposed development on the top of the bluff a sufficient distance to avoid the need for any bluff face or beach stabilization measures.*** The BPI is also clear in its intent that ***alteration of the bluff toe, bluff face or beach shall not be permitted***.

Removal of waivers and deed restrictions for future protection also jeopardizes the required setback and prohibition of any shoreline protection as intended in the BPI.

Relocation of the railroad should be a priority

We support amendments in the the LUP such as III-2.f, advocating relocation of the railroad tracks:

> III-2 Conserve the natural character of land, water, vegetative and wildlife resources within the community by ensuring that future development minimizes the disturbance of existing or natural terrain and vegetation, and does not create soil erosion, silting of lower slopes, slide damage, flooding problems and/or cutting or scarring, through application of the following policies…
> f. Support relocation of the railroad and other public infrastructure from vulnerable bluff areas.

With respect to the South Bluff, some of the proposed new Implementing Ordinances are in conflict with LUP goal III-2f. This could potentially allow the railroad to have shoreline protection, jeopardizing present ad-hoc coastal access and the shoreline

below. The proposed definition of existing development in the LUP is setting the city up to allow for shoreline protection in front of the railroad tracks:

> "Existing development shall mean any structure or development that was lawfully established, altered, and maintained pursuant to the Del Mar Municipal Code (or preceding San Diego County ordinances)."

Additionally, proposed policies describing the "transitional subarea within the Coastal Bluff Overlay Zone" should not be removed from the proposed amendments. This includes language in LUP Section C, as well as 30.055.020 of the Implementing Ordinances. If the goal is to remove the tracks primarily due to hazards, then this area is indeed transitional. Removal of the policies describing the transitional subarea within the Coastal Bluff Overlay Zone weaken the arguments for removing the railroad tracks.

The LCP should not be weakened to permit sea walls in front of the South Bluffs to protect the railroad and allow it to stay in place indefinitely. Relocation of the railroad tracks has wide community consensus. All candidates supported the plan at the September 15, 2018 forum.

> "All candidates agreed that the railroad tracks should be removed from the bluffs, and possibly redirected inland." Source: https://www.thecoastnews.com/del-mar-city-council-candidates-address-issues-in-public-forum/

Residents also supported railroad relocation following the most recent bluff collapse:

> ""If anyone was walking on the west side of the tracks or down below, that would have been game over," Frank Stonebanks, founder of Citizens for Access to Del Mar Beach Bluffs and Trails, told FOX 5.
>
> Stonebanks says he submitted a petition to the City of Del Mar two years ago to move the tracks further inland. He believes moving the track would give beachgoers and surfers, like local Devin Snider, better access to the water below." Source: https://fox5sandiego.com/2018/08/23/residents-concerned-after-cliff-collapses-along-del-mar-train-tracks/

In 2017 Del Mar City council unanimously supported railroad relocation:

> "On Tuesday evening , the Del Mar City Council "unanimously supported adopting and accelerating this proposal to engage key stakeholders to both 1) assess feasibility and recommend a plan of putting in a pedestrian crossing between 6th and 12th streets and 3) accelerate getting the tracks off the bluffs in the next 10 years, and turn the area into a natural park. These were the

measures requested by our petition (600 people signed) submitted to the city in Sep 2016 and supported by council." Source: https://www.10news.com/news/del-mar-wants-to-get-trains-off-its-bluffs

"DEL MAR GOALS

1. Remove the rails from the bluffs to either a tunnel or another alternate location, turning the bluff top ROW into an oceanfront trail and park.

2. In the interim provide safe and legal crossing opportunities"

"POTENTIAL ISSUES TO PURSUE"

"1. The bluffs are unstable, subject to ongoing erosion and sea level rise, making the rail line unreliable now, only to get worse with time

2. Double tracking the bluffs does not appear feasible and would be extremely expensive and environmentally damaging

3. Grade separating Coast Blvd does not appear feasible and would require great expense with immense environmental damage

4. "Defending" the rail line on the bluffs will be expensive on an ongoing basis and is doomed to fail long-term

5. Maintaining the rails on the bluff is contra to important environmental and coastal goals to preserve sensitive bluffs, provide beach access, and protect sandy beaches"

From action plan adopted by consensus at January 17., 2017 City Council Meeting

Source http://www.delmar.ca.us/AgendaCenter/ViewFile/Agenda/_01172017-1324

The Adaptation Plan should be included in the LCP

In addition to the amendments to the LUP and IO, there is also the consideration of where to include the SLR Adaptation Plan (AP). Although City Council has approved the AP, the decision still remains concerning where and how the AP should be used. The City wisely sought an independent legal analysis of the various options for placement of the AP in the Community Plan, the LCP, or both. This independent legal analysis concluded that the AP can be part of the Community Plan in addition to but not in lieu of inclusion the LCP.

Those who argue against placing the AP in the LCP are arguing more generally that

the LCP should never be amended for fear of Coastal Commission overreach. For them to propose that an important regulatory document like the LCP should never be amended even in the face of changing environmental circumstances is extremely short-sighted. Without amendments to the LCP, the city will may be able to procure Sand Compatibility and Opportunistic Use Program (SCOUP) permits to obtain sand needed to replenish Del Mar's beaches. Without amendments to the LCP, the city will be unable to update its regulations in the face of increased risks to floods and other storm events related to climate change.

Additionally, the Planning Commission voted unanimously to approve the suggested amendments to the LCP. They did not heed the somewhat hysterical protests that putting the LCP up for amendment in front of the Coastal Commission would harm the city irreparably. If the Planning Commission is comfortable with amending the LCP, then City Council should take that as a vote of confidence in the process and vote to include the AP as an amendment to the LCP. If the LUP and IP are being amended, it is a logical conclusion to also add the AP to the LCP as an additional amendment.

Reality Check

We are generally concerned with the direction this process and the proposed amendments have taken. Several years ago, the Sea Level Rise Technical Advisory Committee (STAC) voted overwhelmingly to include managed retreat as an adaptation option. Managed retreat was only to be used when other options have failed, and the beaches were lost to the rising seas. Over time, as the STAC's process lost its scientific and technical perspective, managed retreat was stripped from the Adaptation Plan. As part of this weakening of the Adaptation Plan, there has been a persistent misinformation campaign mounted by members of the community and their paid geotechnical 'experts' and lawyers. This vocal minority of Del Mar is focused solely on hypothetical decreases in private property values, and have stated in public comment that they don't care if the public beaches and surfing resources are lost to the ocean due to coastal armoring.

We find this approach very short-sighted and not based in science or law. For this reason, we would like to reiterate that relying only on coastal armoring, and not allowing for the distant possibility of managed retreat, will lead to inundation of the Beach Colony, significant threats to public safety, and loss of the public's beach.

SANDAG and Caltrans prepared a report titled "San Diego Region Coastal Sea Level Rise Analysis" in September 2013 (available for download at http://www.dot.ca.gov/dist11/Env_docs/I-5PWP/Appendices/AppDSeaLevelRise.pdf). Page 43 Figure 7-1 of this report provides the following information concerning North American Vertical Datum of 1988 (NAVD), National Geodetic Vertical Datum of 1929

(NGVD), sea level and tides. Datum is simply a reference point for vertical surveys. The NGVD datum was recorded in the year 1929.

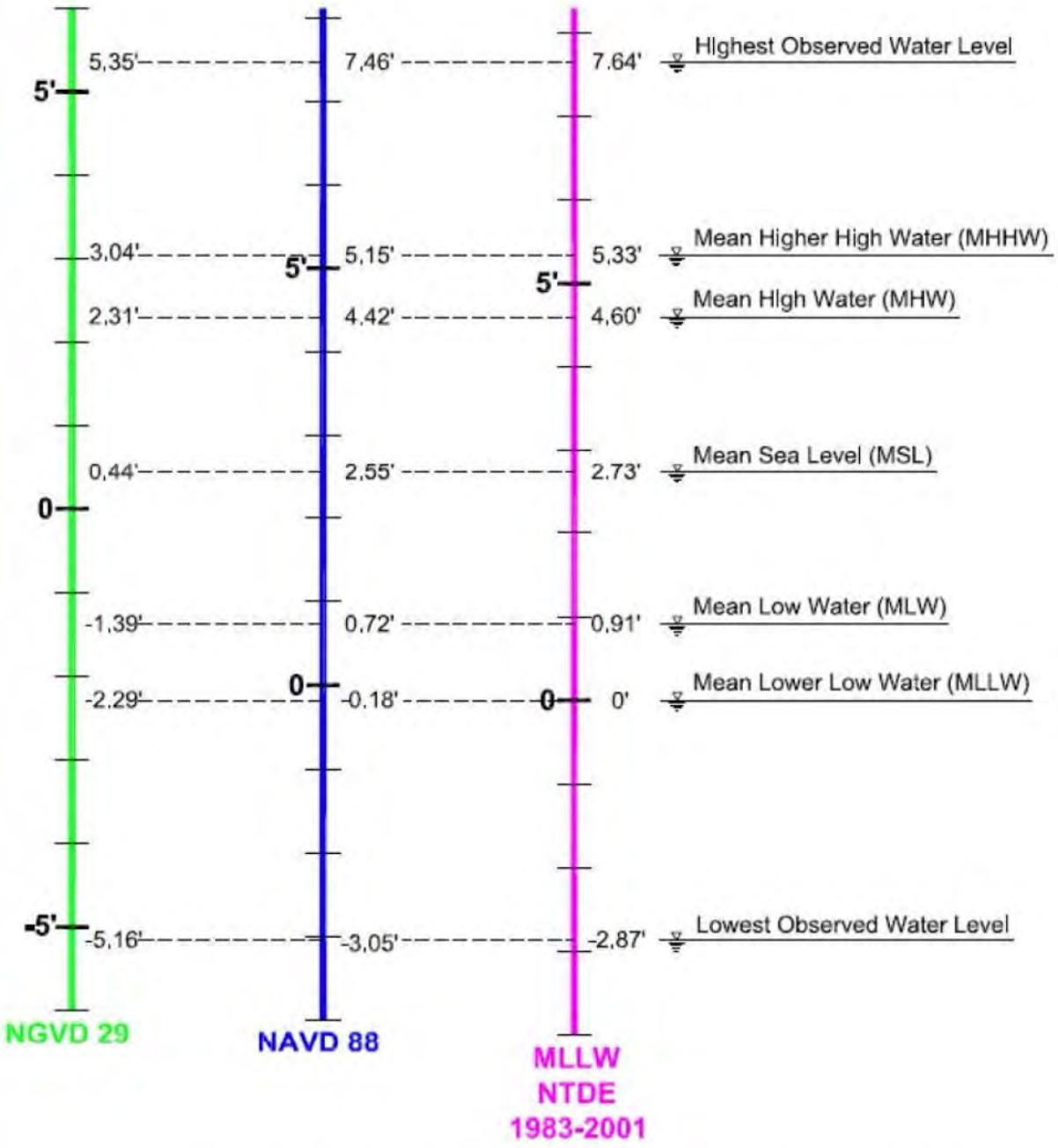


Figure 7-1: Vertical Tidal Datums at Scripps Pier in La Jolla

As of 2000, the mean sea level in La Jolla was at 0.44ft NGVD. An additional survey, NAVD, was done in 1988. The difference between NAVD and NGVD is 2.11 ft. In 2000, the mean sea level was 2.55ft in NAVD.

The Coastal Hazards, Vulnerability, and Risk Assessments document prepared for the STAC used NAVD for assessment of sea level rise and wave levels. Table 1 of this document reports the following SLR projections:

TABLE 1
SEA LEVEL RISE (SLR) PROJECTIONS

	2030	2050	2070	2100
Mid SLR	5 in	12 in	20 in (1.7 ft)	37 in (3.1 ft)
High SLR	12 in	24 in	38 in (3.2 ft)	66 in (5.5 ft)

Using these SLR projections in combination with the Vertical Tide Datums of Figure 7-1 of the San Diego Region Coastal Sea Level Rise Analysis report, we can calculate Mean Sea Level (MSL), Mean High Water (MHW), Mean Higher High Water (MHHW), and the Highest Observed Water Level (HOWL) for both the Mid and High SLR Projections.

	Current	2030	2050	2070	2100
Mid SLR	-	0.42	1	1.7	3.1
Highest Observed Water Level	7.46	7.88	8.46	9.16	10.56
Mean Higher High Water	5.15	5.57	6.15	6.85	8.25
Mean High Water	4.42	4.84	5.42	6.12	7.52
Mean Sea Level	2.55	2.97	3.55	4.25	5.65
High SLR	-	1	2	3.2	5.5
Highest Observed Water Level	7.46	8.46	9.46	10.66	12.96
Mean Higher High Water	5.15	6.15	7.15	8.35	10.65
Mean High Water	4.42	5.42	6.42	7.62	9.92
Mean Sea Level	2.55	3.55	4.55	5.75	8.05

Del Mar's current LCP Implementation Plan specifies the following in section 30.50.060 Authorized Protection Structures:

I. Will, if there is a riprap element in the proposed structure:

1. Have the riprap extending no more than 20 feet westward from the Shoreline Protection Area line.

2. Have a westward slope beginning no higher than a 5.7 foot elevation (NGVD) at the Shoreline Protection Area Line, decreasing in height at a minimum rate of one vertical foot for every one and one-half feet of lateral distance, the riprap extends westerly of the SPA line.

To translate from NGVD to NAVD, the Implementation Plan specifies that rip rap may not be any higher than 5.7 NGVD, or 7.81 NAVD. This means that under either the Mid or High SLR scenario, rip rap will regularly be under water. Under the Mid SLR scenario, rip rap will be under water at high tide sometime between 2050 and 2070. The height of the existing storm drain outlets in the Beach Colony is just as alarming. Many storm drains are currently below 8.11 NAVD, so these will also regularly be underwater. This presents a significant public safety threat, as water in the flooded Beach Colony will have nowhere to go if the drains are below the water level.

In Terra Costa's scientifically flawed and highly biased report titled "The Infeasibility of Managed Retreat for the City of Del Mar: A White Paper" Figure 1 provided a useful illustration for demonstrating the infeasibility of indefinite armoring of the beach. Elevations provided in this illustration were calculated using NGVD, so we have updated them to the NAVD as this is the standard used throughout the Vulnerability Assessment.

Figures 1 through 4 show the current situation and predictions for 2030, 2050, and 2070. They illustrate that riprap and storm drains will frequently be underwater, presenting a serious danger to public health and safety, in addition to a loss of the public's sandy beaches. Camino Del Mar itself will be under water frequently as well. One of the STAC's guiding principles was the maintenance of a walkable beach. If riprap is allowed on the beach at its current location, this guiding principle will soon be violated.

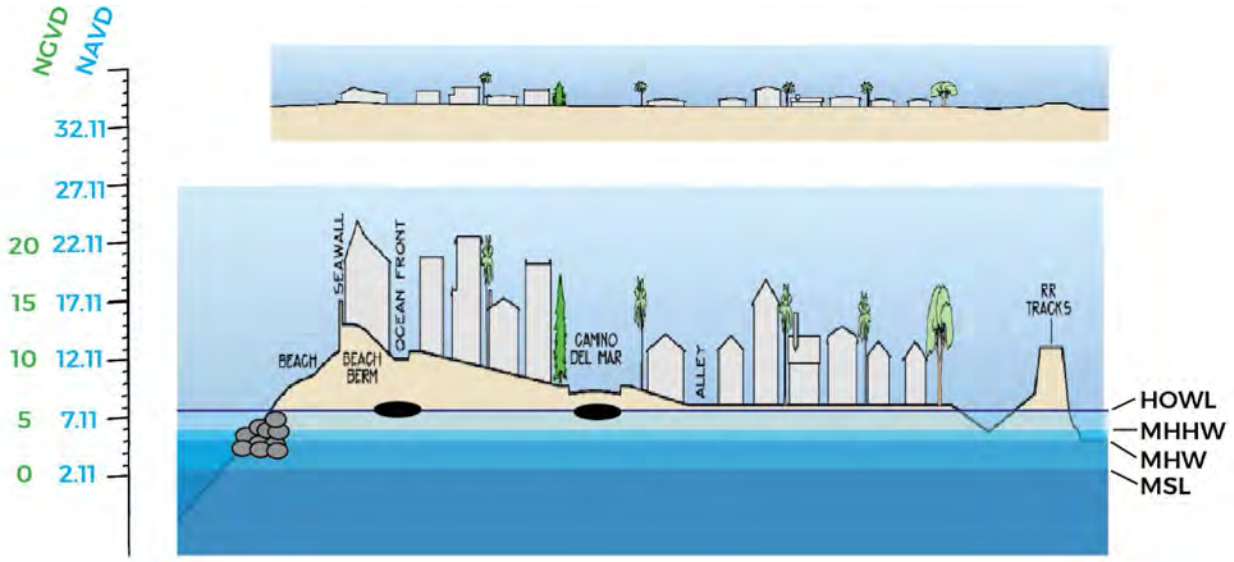


Figure 1 - Sea level and tides under current conditions
Riprap and storm drains

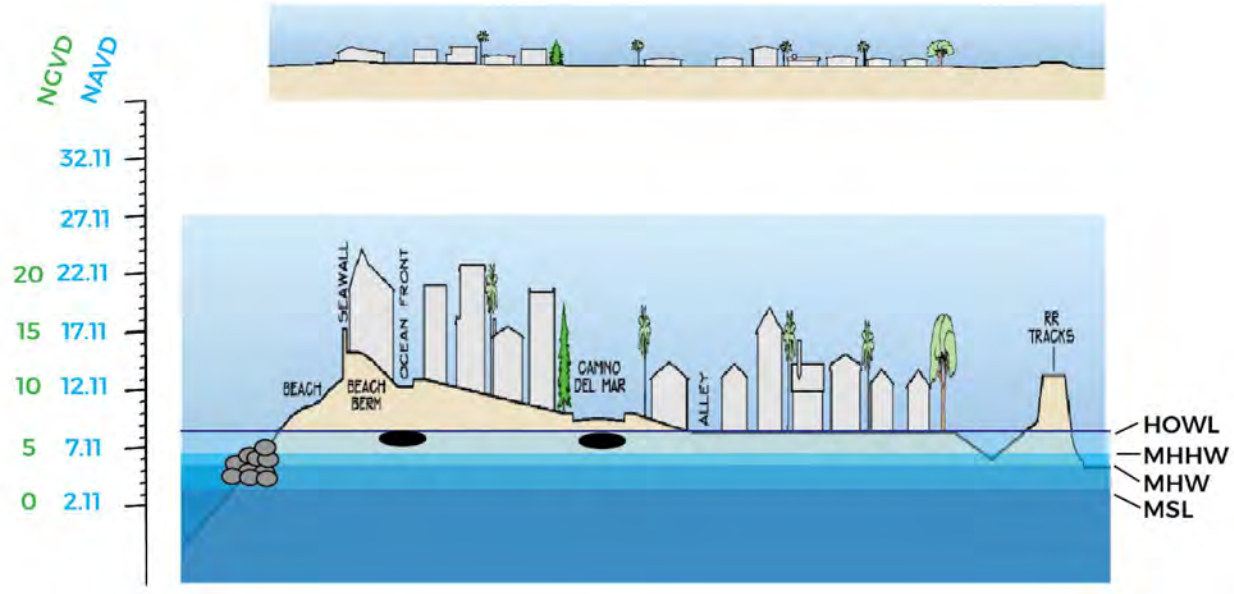


Figure 2 - Sea level and tides in 2030 (+1ft SLR)
Riprap and storm drains

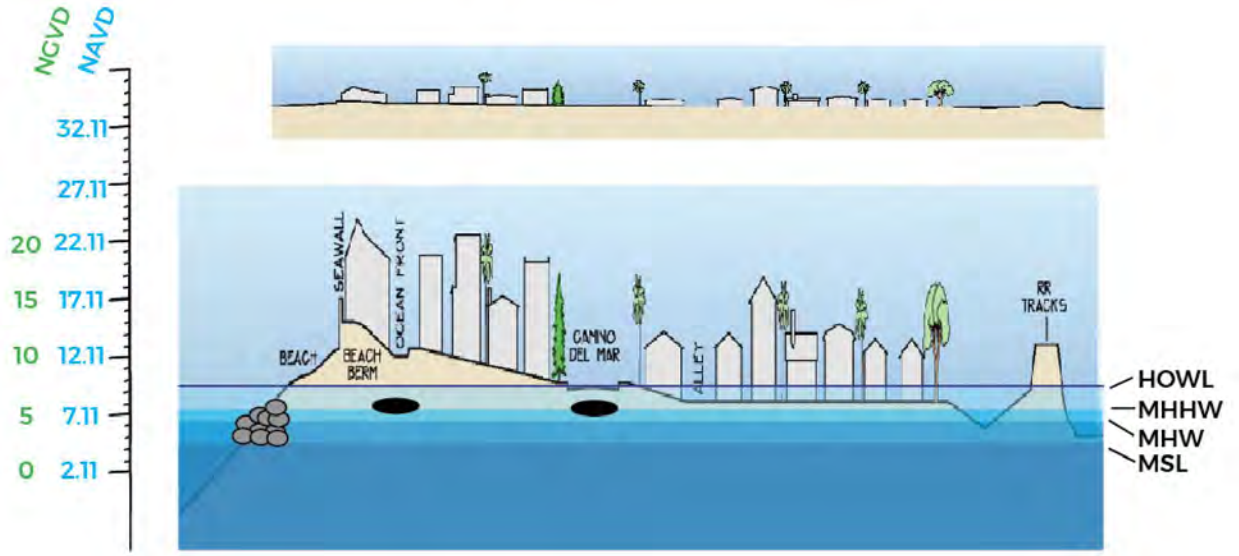


Figure 3 - Sea level and tides in 2050 (+2ft SLR)
Riprap and storm drains

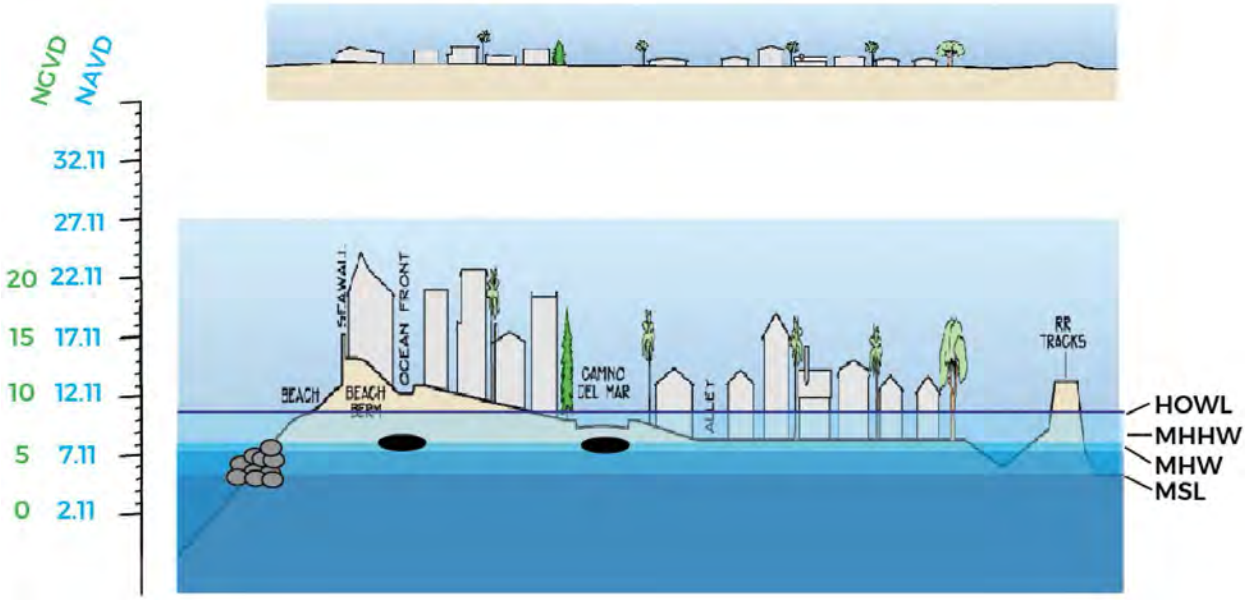
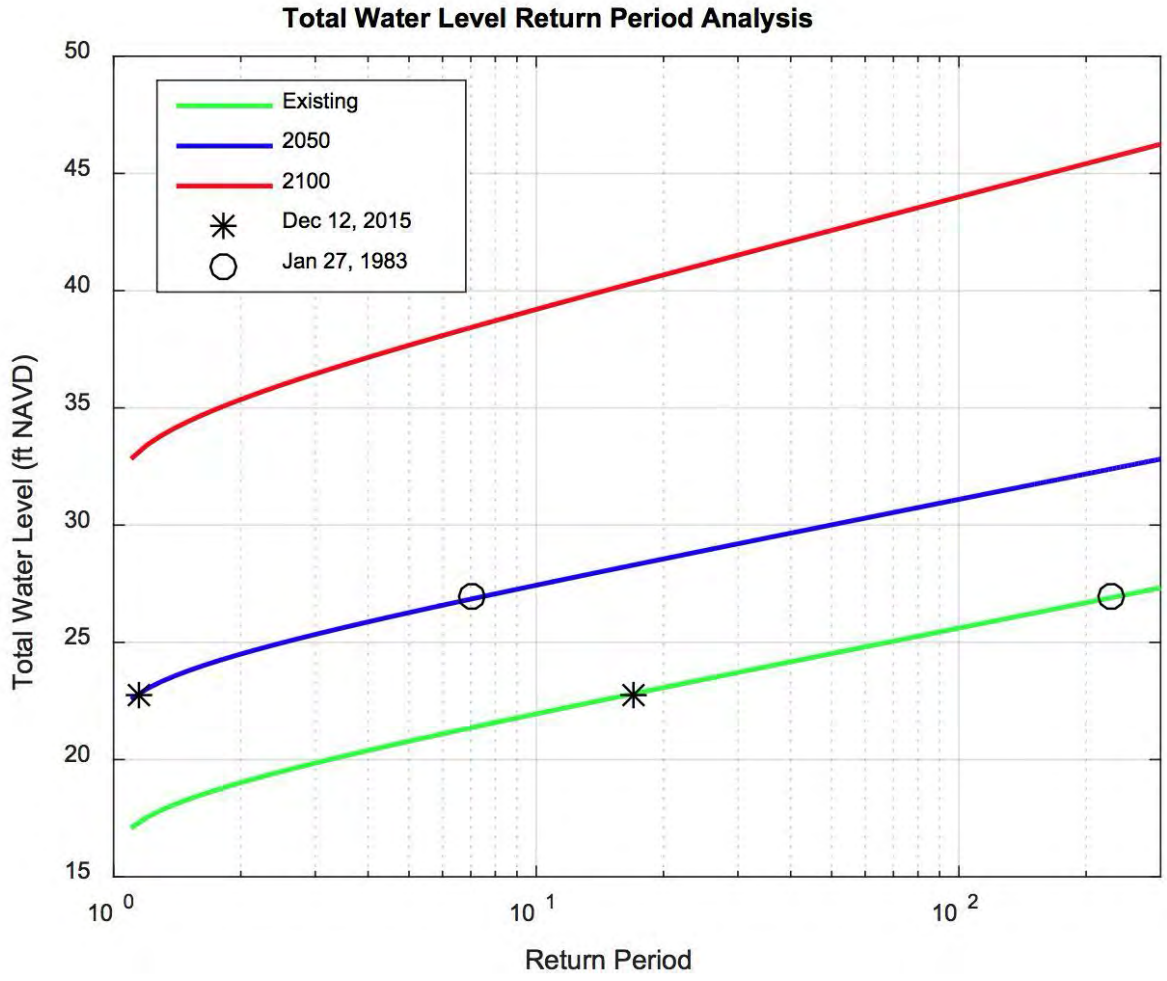


Figure 4 - Sea level and tides in 2070 (+3.2ft SLR)
Riprap and storm drains

Beyond the daily hazards posed by underwater storm drains and rip rap, storm events will be even more devastating as sea levels rise. The vulnerabilities report analyzed the Total Water Level (TWL) return period in Table 32.



To explain this chart in layman's terms, the 'return period' means the likelihood of an event. Total Water Level represents the maximum elevation of the water surface, accounting for still water level (tides) and wave runup. So a return period of $10^{\wedge 0}$ (equal to 1) means that there is a 100% chance the TWL could reach this level every year. A return period of $10^{\wedge 1}$ (equal to 10) means there is a 100% chance of an event occurring every 10 years, or conversely, there is a 10% chance of the TWL reaching that height in any given year. Lastly, a return period of $10^{\wedge 2}$ (equal to 100) means there is a 100% chance of an event occurring every 100 years, or conversely, there is a 1% chance of the TWL reaching that height in any given year. For reference, two historical storm events were included on the TWL Return Period Analysis (green line). The December 12, 2015 is similar to a predicted 10-year storm, and the January 27, 1983 event is similar to a predicted 100-year storm.

Figures 5 through 7 illustrate this information in the context of the Beach Colony. By 2050, it is predicted that the TWL will easily overtop the height of the sea walls on a

yearly basis.

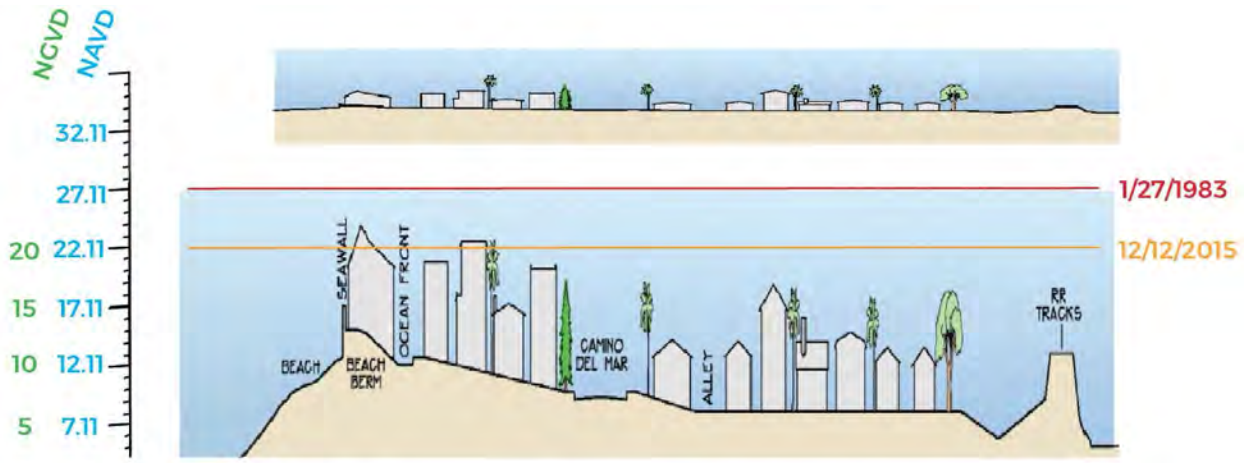
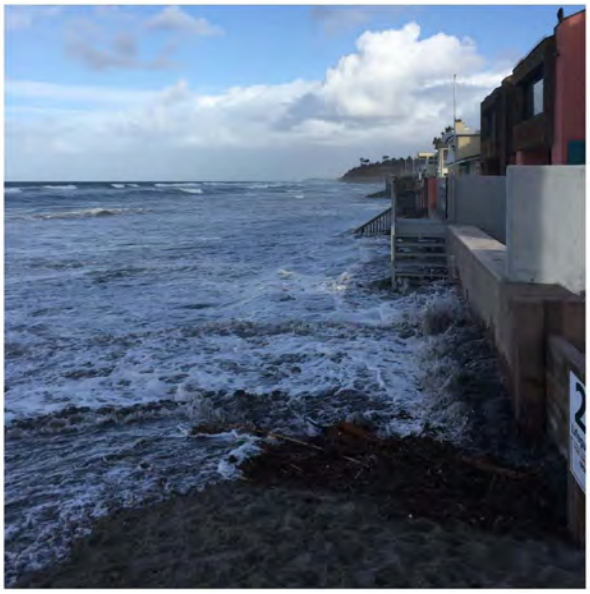


Figure 5 - Historical storm TWL

The Vulnerability and Risk Assessment Study prepared for the STAC provided historical photographs of the 1983 storm event as well as wave runup in 2016. These images show what it looks like when TWL reaches the levels depicted in Figure 5.

Coastal Damage following 1983 Storm

Large Waves during 1983 Storm



Overtopping in Del Mar, 3/8/16

Wave Runup in Del Mar, 2/12/2016

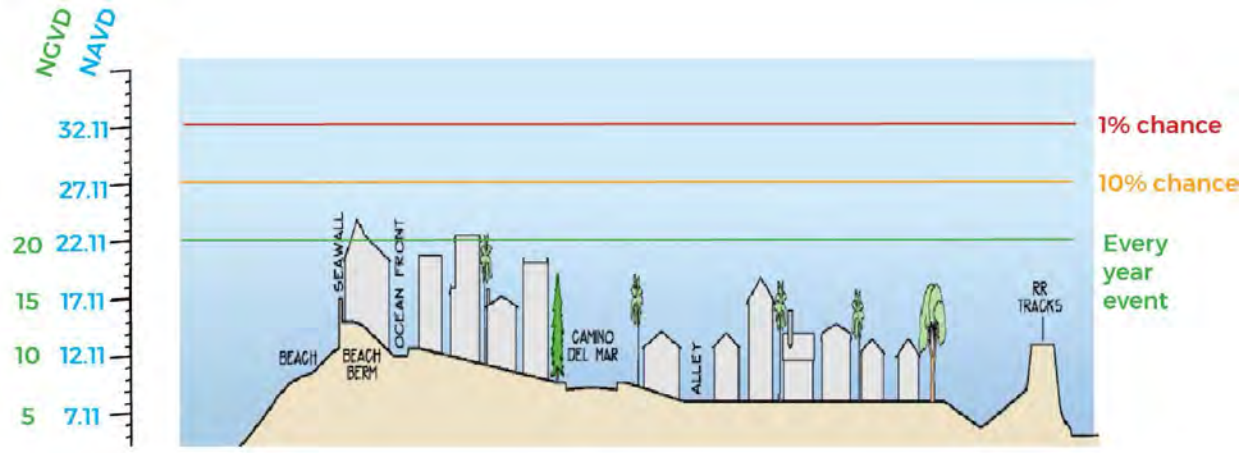


Figure 6 - 2050 Predicted TWL

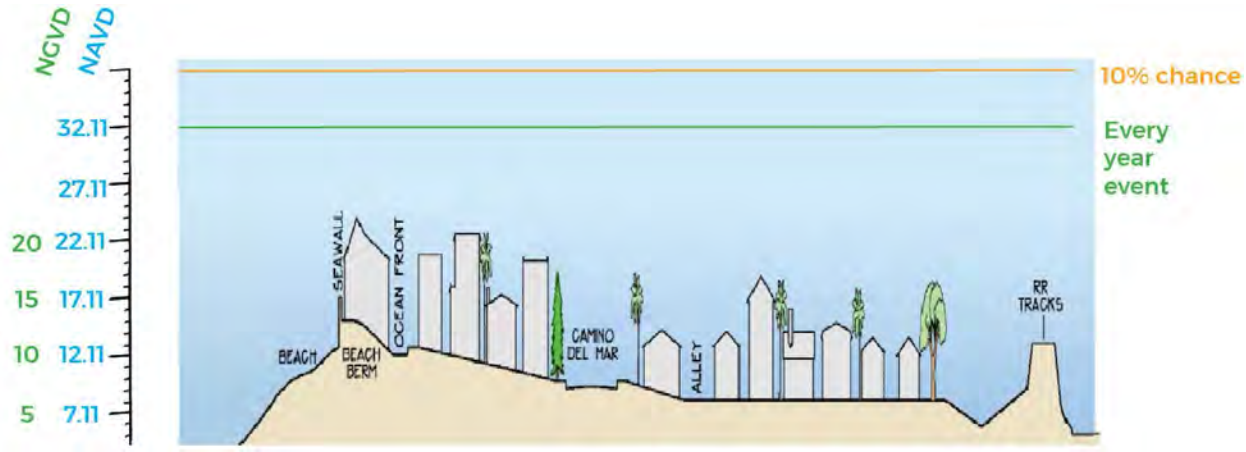


Figure 7 - 2100 Predicted TWL

For some perspective, we suggest you visit the trail markings on the northern side of San Dieguito Lagoon east of Jimmy Durante. The posts mark the water levels under various sea level rise scenarios, as well as the high water mark of a 1980 flood event.

In summary, to totally discount the idea of managed retreat, attempt to allow new development the right to future armoring, and weaken the setback rules, all threaten the safety and livelihood of the residents of Del Mar and the greater beach-going public. Take a moment to consider how Californians have come to grips with the fact

that we live in an active fault zone. Building codes have been strengthened, earthquake insurance is becoming more affordable, and many people have emergency supply kits stocked in their garages or closet. This is all in response to an unpredictable event that may or may not happen in our lifetime, in the next century, or even in the next thousand years. Contrast that with the way Del Mar is currently addressing SLR. This is a threat that is real, is fairly predictable, supported by the vast scientific consensus, and is essentially a very slow-moving but inevitable flood headed our way. To not respond to that now, while we have the chance to proactively prepare, Del Mar is setting itself up for a series of unplanned evacuations, loss of property, and potential loss of life.

Thank you for considering our comments on this important topic. We'd be happy to answer any further questions you may have.

Sincerely,

Kristin Brinner
Member of the Sea Level Rise Technical Advisory Committee
Beach Preservation Committee co-chair
San Diego County Chapter, Surfrider Foundation
Resident of Solana Beach

Jim Jaffee
Beach Preservation Committee co-chair
San Diego County Chapter, Surfrider Foundation
Resident of Solana Beach

Julia Chunn-Heer
Policy Manager
San Diego County Chapter, Surfrider Foundation
Resident of Cardiff

APPENDIX B

June 2, 2021: Comments to the California Coastal Commission regarding City of Del Mar Major Amendment LCP-6-DMR-20-0005-1

Phone: 858.800.2282 | info@sandiego.surfridersd.org | surfridersd.org
3900 Cleveland Ave., Ste B, San Diego, CA 92103

June 2, 2021

Delivered via email
To: Chair Steve Padilla, California Coastal Commission
CC: Jack Ainsworth, Executive Director, California Coastal Commission; Karl Schwing, Deputy Director, California Coastal Commission, San Diego Coast District

Re: City of Del Mar Major Amendment LCP-6-DMR-20-0005-1

Dear Chair Padilla,

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's oceans, waves, and beaches for all people, through a powerful activist network. With nearly 70 miles of coastline to protect, the Surfrider Foundation San Diego County Chapter is the largest and most active chapter in the country. We are a grassroots organization, which means the people working to protect our local ocean, waves, and beaches are volunteers who care about the San Diego County coastline and want to make a difference.

Studies have repeatedly shown that not only is sea level rise inevitable – and every new study forecasts increasingly dire scenarios – but sea level rise is also likely to cost the State of California even more than earthquakes or wildfires. With such a threat steadily marching toward us, every action the Coastal Commission takes to address it (or not) is what will save our beaches (or not). The pending decision regarding the City of Del Mar's Local Coastal Program Amendment (LCPA) has repercussions for everyone who enjoys the coast in Del Mar, as well as the rest of our region where many cities are in the process of updating their LCPs.

Support for staff's suggested modifications

We agree with staff that Del Mar's proposed amendments to their Land Use Plan (LUP) and Implementation Plan (IP) should be rejected as submitted. Staff hits the mark when stating that extensive work has been done in Del Mar to understand its serious vulnerabilities to Sea Level Rise (SLR), and it is imperative that this important planning document address those hazards.

There are several Suggested Modifications that are imperative to preserve public

rights and ability to access beaches in the future. These modifications are necessary for our support of the plan, but they could be further strengthened:

Suggested Modification No. 11 and 16: Modifications related to the definition of existing development.
We support staff's recommendation to remove the ill-conceived definition of existing development. It is particularly important to define existing development accurately, as there have been multiple development projects proposed since this LCP draft was first submitted, including residential development and the Marisol proposal (otherwise known as the Zephyr development) above Dog Beach.

Further, the definition of existing development should be strengthened. A specific definition of existing development based on actual legislative intent would provide critical guidance to Del Mar as it accepts and implements its LCP. The Commission should go further and define existing development as development that existed prior to the Coastal Act passage in 1977. Per Sections 30235 and 30253 of the Coastal Act and the Commission's SLR Policy Guidance document, new development should not require seawalls, and any development after 1977 is considered new development.

The 1977 definition of existing development is also upheld in the 2019 decision concerning the Lindstrom CDP and the Commission's Sea Level Rise Policy Guidance document. As detailed in the Staff Report, the Commission interprets the term "existing structures" in Section 30235 of the Coastal Act as structures that were in existence on January 1, 1977—the effective date of the Coastal Act. This should be explicitly confirmed as the definition in Del Mar's LCP as well.

Suggested Modification No. 17. Modification related to the definition of "Substantial Improvement"
We agree with staff's suggested modification that generally strengthens the definition of "substantial improvement." This loophole is currently actively being exploited in the neighboring city of Solana Beach to effectively construct new structures behind the protection of seawalls intended for existing structures.

Including 50% thresholds for substantial improvements or development of existing structures is important to prevent the indefinite extension of an existing structure's economic lifetime. However, we think the policy should be further clarified to include replacement work undertaken on or after January 1, 1977 (effective date of the coastal act), rather than September 11, 2001 (date of LCP certification).

We object to the proposed dates used in Section 30.56.030 b iii and iv:

iii. Replacement (including demolition, renovation, reinforcement, or other type of alteration) of less than 50% of a major structural component where the proposed replacement would result in cumulative alterations exceeding 50% or more of that major structural component, taking into consideration previous replacement work undertaken on or after ~~September 11, 2001 (the date of certification of the LCP)~~ **January 1, 1977 (effective date of the Coastal Act)***; or*

iv. an alteration that constitutes less than 50% increase in floor area where the proposed alteration would result in a cumulative addition of 50% or greater of the floor area, taking into consideration previous additions undertaken on or after ~~September 11, 2001 (the date of certification of the LCP).~~ **January 1, 1977 (effective date of the Coastal Act).**

We find no basis in law or policy to justify the use of the LCP certification's date as the basis for determining substantial improvement. Instead, January 1, 1977 - the effective date of the Coastal Act - should be used as the cutoff date when considering whether 'substantial improvement' has occurred. The 2001 date must otherwise be justified.

Importance of maintaining other critical modifications

We also stress the importance of the following Suggested Modifications:

Suggested Modification No. 2. related to Chapter III's goals and Policies.
Staff correctly incorporates the goals of the 2018 Del Mar Sea Level Rise Adaptation Plan as policy. In particular, we stress the importance of including maintenance of a walkable beach as a primary goal. Del Mar's Sea Level Rise Technical Advisory Committee determined unanimously at its formation that a walkable beach should be a founding principle guiding its work, so it is logical to include this as a stated goal of the proposed amendments.

Suggested Modification No. 3. Mandating periodic and threshold-based updates to the LCP.
Requiring further updates to the LCP based on concrete thresholds and time spans gives the city more flexibility to adjust to changing conditions. The specific thresholds suggested by the staff report are based in reality and science, and they also reflect the findings of the City's own Vulnerability Assessment. The City and SANDAG have been working to fast-track a plan to remove the LOSSAN railroad from the bluffs. The importance of this long-term project has been repeatedly demonstrated in the last year, as bluff collapses along the tracks have interrupted the

trains travelling this corridor. Given the city's current support for relocation of the Del Mar section of the LOSSAN railroad tracks, as well as the changes to our environment due to SLR, it is reasonable to mandate periodic updates of the LCP to address any additional changed circumstances beyond the immediate need to relocate the railroad tracks.

Suggested Modifications No. 4 and No. 12 concerning setbacks.
As staff suggested, it is imperative that SLR, time (75 years), and slope stability all be incorporated into the calculation of coastal bluff setbacks. It's also important to remove any alternative stability requirements, as we have seen countless times how an applicant's geotechnical 'experts' will come up with whatever number is convenient to the private property owner, not the beach going public.

SLR, time (75 years), and slope stability are consistent with guidance from the 2003 document by Dr. Mark Johnsson titled "Establishing development setbacks from coastal bluffs"[1] and the Commission's Sea Level Rise Policy Guidance, which we detailed in our 2019 Letter to the Commission regarding this LCP[2]. The modifications are also necessary in order to comply with Section 30253 and other Coastal Act Policies.

Broad community support for effective setback standards was very recently demonstrated by the defeat of Measure G: Marisol Specific Plan by the residents of Del Mar. Surfrider wrote a letter to the City on February 3, 2020 outlining our concerns about the Draft EIR and specific plan amendments. A major concern we had was the EIR's utilization of very optimistic and weak setback calculations.

We do support further modifications to the setback policies proposed. Staff suggested adding a route to smaller setbacks to mitigate potential claims of takings associated with setbacks. However, we feel this modification as drafted could ignore the perils of SLR, 75 years of projected bluff erosion, and inclusion of a factor of safety when calculating setbacks. Staff suggests adding the following to Chapter 30.55 Coastal Bluff Overlay Zone, Section 30.55.050 Development Regulations for the Coastal Bluff Overlay Zone:

> *d. If application of the minimum 40-foot setback would preclude reasonable use of the property such that it would constitute a taking of private property, a smaller setback may be permitted if the proposed development is setback as far landward as feasible and its footprint is minimized.*

[1] https://www.coastal.ca.gov/W-11.5-2mm3.pdf Johnsson, Mark. "Establishing Development Setbacks from Coastal Bluffs", 16 January 2003, Memorandum to Commission, W11.5.
[2] https://drive.google.com/file/d/1NCTTLbB1mdsgCt_trK9CJ4L68akMPXtJ/view

Based on past history in surrounding neighborhoods like Solana Beach and Encinitas, this argument will be consistently misused to completely negate all of the important setback calculations. This conflicts directly with staff's suggested amendments for setbacks concerning SLR and factor of safety. It is probable that a minimum 40 ft setback will not meet the more stringent requirements of safety over 75 years when sea level rise is taken into account. This loophole should be removed entirely. Otherwise it should include a condition that any permit for New Development - regardless of setback calculations - explicitly waives the right to any future armoring and is subject to removal of threatened portions if at any time it is threatened by erosion.

Suggested Modification No. 5 and No. 13 concerning development location. Staff was correct when acting to strengthen the LCP to require that development be located to eliminate the need for protective devices. It is important that any loopholes that could be interpreted to allow new structures protective devices be removed.

Suggested Modification No 19 concerning floodplain development permits. It is important here to specify that development in the floodplain is a hazardous proposition, and that because of the goals stated elsewhere in the LCP concerning relocation of public infrastructure, it may be impossible to provide public infrastructure to private residences located in a floodplain.

We are generally in agreement with all of the remaining Suggested Modifications.

Support for the City's amendments regarding track relocation

In addition to suggested modifications by staff, we support the relocation of the railroad tracks, as proposed by the City and agreed to by staff in the staff report:

Amendment to Policy III-2 of the certified Land Use Plan:

> *f. Support relocation of the railroad and other public infrastructure from vulnerable bluff areas.*

Relocation is supported by our regional metropolitan planning organization, SANDAG. Presenting at the May 3, 2021 Del Mar City Council Meeting, SANDAG staff confirmed that realignment "was a priority moving forward' and presented alignment options[3]. The Director of the organization was recently quoted[4] in a news

[3]https://www.delmar.ca.us/AgendaCenter/ViewFile/Agenda/_05032021-2737
[4] https://thecoastnews.com/sandag-affirms-commitment-to-move-tracks-off-del-mar-bluffs/

article this March:

> *"You can fight nature, but nature is going to win at the end of the day," said Hasan Ikhrata, executive director of SANDAG. "We are absolutely intending to have part of the regional transportation plan in May release a project that would move the tracks off the bluff once and for all. Yes, it's expensive, yes it's going to take a long time, but that is the right thing to do for the region."*

Relocation of the tracks was also supported unanimously by the Del Mar City Council at the April 19, 2021 meeting:

> *IT WAS MOVED BY MAYOR GAASTERLAND, SECONDED BY COUNCILMEMBER DRUKER TO REAFFIRM GETTING TRAINS OFF THE BLUFF AS SOON AS POSSIBLE. (VOTE 5-0) (4/19/2021 approved minutes)*

To restore lateral and vertical beach access, we also believe the LCPA should include provisions mandating the removal of all stabilization measures for the rail as soon as they are no longer required for the safety of the railroad. Additionally, fencing and stabilization measures in the interim period should be discouraged or prohibited where possible. If fences or additional interim stabilization is required, mitigation must be required in the LCPA with in-place and not in-kind access both vertically from the bluff to the beach and along the bluff. Examples of improved access include tunnels or stairs and at-grade crossings and additional signaling.

Conclusions

Del Mar's Sea Level Rise Technical Advisory Committee, the City, and Coastal Commission staff have done important work to amend the city's LCP. Altogether, this work represents an important first step in recognizing the difficult choices we will have to face in the near future with accelerating SLR and climate change.

We support staff's suggested modifications to the LCP. We also ask that the following changes be made to the Del Mar LCP to further strengthen the protection of the public's beach:

- **Redefine existing development**: Existing development should be defined per the original intent of the Coastal Act, as supported by the recent decision concerning the Lindstrom CDP and the Commission's Sea Level Rise Policy Guidance document. January 1, 1977 - the effective date of the Coastal Act - should be used as the cutoff date when considering whether 'substantial improvement' has occurred.
- **Strengthen definition of substantial improvement:** We find no basis in law or policy to justify the use of the LCP certification's date as the basis for determining substantial improvement. Instead, January 1, 1977 - the effective date of the Coastal Act - should be used as the cutoff date when considering whether 'substantial improvement' has occurred.
- **Remove the setback loophole**: Regulations specifying blufftop setbacks in Section 30.55.050 Development Regulations for the Coastal Bluff Overlay Zone should not be weakened by adding a decreased setback loophole. Setbacks should only take SLR, projected 75 year erosion, and factor of safety into account. A smaller setback should not be permitted. If such setback is permitted, it must include a condition for removal of threatened structures or portions of structures if they are ever threatened by erosion in the future. This condition should apply to all setbacks associated with New Development.
- **Strengthen railroad relocation LCPA policies to include mitigation for temporary stabilization measures and fencing**: Temporary railroad stabilization measures should be removed and temporary impacts to access should be mitigated.

In a broader context, it is the Coastal Commission's duty to ensure that local jurisdictions' plans will adequately plan and respond to sea level rise. We understand and support the sentiment from the City of Del Mar in wanting to make locally relevant decisions pertaining to broad questions surrounding sea level rise and erosion. We believe the current version of the LCP, with staff's suggested modifications, allows the City room to do this while ensuring a check and balance to protect the public beach.

Staff's modifications are a compromise that moves the City in the right direction toward an adequate plan by including thresholds for considering a wider suite of adaptation options and by providing an avenue for the City of Del Mar to commit to incorporating updated sea level rise science into its planning on a regular basis.

California's voters and the Coastal Act created the Coastal Commission as a check and balance to prevent local jurisdictions from ceding the public's coast and beach to private property interests. We respectfully request that you accept staff's suggested modifications to ensure equitable access to our beaches.

Sincerely,

Kristin Brinner
Member of Del Mar's Sea Level Rise Technical Advisory Committee
Resident of Solana Beach
Co-Lead of the Beach Preservation Committee
San Diego County Chapter, Surfrider Foundation

Jim Jaffee
Resident of Solana Beach
Co-Lead of the Beach Preservation Committee
San Diego County Chapter, Surfrider Foundation

Laura Walsh
Policy Coordinator
San Diego County Chapter, Surfrider Foundation

APPENDIX C

July 26 2021: Comments to Del Mar City Council on Item 2, SANDAG's presentation to Del Mar City council concerning Del Mar Bluff Stabilization Project

Phone: 858.800.2282 | info@sandiego.surfridersd.org | surfridersd.org
3900 Cleveland Ave., Ste B, San Diego, CA 92103

July 26, 2021
Delivered via email
To: Del Mar City Council

Re: Item 2 - Presentation by SANDAG on Del Mar Bluff Stabilization Project

To the members of the Del Mar City Council —

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches for all people, through a powerful activist network. The Surfrider Foundation San Diego County Chapter has more than 2,300 members, many of whom enjoy Del Mar's coastline. Bluff stabilization of the Del Mar section of the LOSSAN corridor railroad tracks will have significant impact on the city's coastline and coastal access, and we submit the following comments related to SANDAG's proposed stabilization efforts.

Extreme bluff stabilization measures should be avoided to the extent possible

As we pointed out in our comments on Item 15 of today's City Council agenda, SANDAG's proposed bluff stabilization measures will have an extreme impact on the public's beach. SANDAG has maintained that its Del Mar Bluffs Phase 5 and 6 proposals, which include the construction of a contiguous seawall from 15th street to Sherrie Lane, have been designed to stabilize the bluffs for thirty years, until approximately 2050. The timeline for track realignment however, has newly been accelerated where an operable inland track could exist by 2040.

Given this accelerated timeline, Surfrider urges SANDAG not to erect beach destroying seawalls that will outlast their useful need in protecting the track in its current position. To this point, Surfrider strongly recommends that the City Council work with SANDAG to ensure that hard armoring is only erected where necessary to ensure safety of the track as long as it is operated.

We recommend that the City requests SANDAG to commit to reevaluating the Del Mar Bluffs Phase 6 (DMB6) proposal in three years, based on updated information about the alignment alternative selected and its completion timeline. DMB6 is not scheduled to be initiated until 2026, so postponing DMB6 proposals until 2024 would allow the agency time to reevaluate its hard armoring plans and update the appropriate permit applications.

Additionally, the lifetime of the seawalls should be tied to their benefits to the track in its current location. Every year that the seawalls exist, they will take up the public's beach space, block coastal access, and erode the public beach. Bluff toe stabilization permitted and financed for the purpose of ensuring track safety should not be allowed to continue negatively impacting the public beach and bluffs beyond the track's operable lifetime. For this reason, we also urge the City Council to work with SANDAG to ensure that bluff stabilization infrastructure is removed as soon as possible and to earmark funding for seawall removal.

Significant bluff stabilization activities warrant significant mitigation efforts

DMB5 and DMB6 include the construction of a contiguous seawall, as well as extensive trenching and regrading of the bluffs. The impacts to the coastline through erosion and coastal access will be enormous. Mitigation should be equally and inversely impactful. In making mitigation determinations, Surfrider strongly urges the City to thoroughly review SANDAG's erosion rate calculations. Surfrider has seen how erosion rates can dramatically differ across permit applications related to coastal development along Del Mar's bluffs. In this case, a first step in reviewing the relied upon erosion rates would be to ensure that the same erosion rates SANDAG is using to justify the need for bluff stabilization efforts in the first place are also used as a foundation for mitigation calculations.

Mitigation should be in the form of projects, with safe crossings incorporated

Not all mitigation is created equal. In order to ensure that mitigation is tangible and provides the most benefits to Del Mar and to beachgoers, Surfrider recommends that SANDAG include mitigation project proposals as part of its DMB5 federal consistency application to the California Coastal Commission. Given the enormous impact of this project to the public beach and coastal access, the City of Del Mar should expect tangible and timely beach and public access benefits as mitigation for the stabilization activities. As the entire Southern part of the City's bluffs undergoes construction, The City should not merely accept fees with no real plans to direct that mitigation funding to projects. SANDAG's proposals should be project specific, and they should be reviewed as part of the Coastal Commission's federal consistency

determination on this project so that the public and the City of Del Mar have the appropriate opportunity to participate in the project selection process.

Surfrider also understands that NCTD is proposing to erect a fence along the Del Mar bluffs that will effectively blockade countless special coastal access spots in the City. We echo calls from the community that NCTD should work with the City to establish safe crossings, and request that this be considered as a form of mitigation for bluff stabilization projects.

We recognize that SANDAG, the North County Transit District (NCTD), and City of Del Mar are working on a Coastal Connection Study to evaluate project-based mitigation options for coastal access disruptions to the City, and that this study is set to be completed in 2022. Surfrider urges the City Council to question whether this study timeline can be accelerated or whether the federal consistency determination can be postponed in order to enable appropriate public review of tangible mitigation options that will support coastal access.

Conclusion

The City of Del Mar is facing tandem proposals to fence off the top portion of its bluff and wall off the bottom. The City's ability to affect and influence these proposals will shape coastal access for the current and next generation in Del Mar. We strongly encourage the City Council to avoid beach destroying stabilization measures to the extent possible, particularly by tying interim stabilization measures to the lifetime of the tracks in their current location. Where this cannot be done, meaningful steps towards real project-based mitigation must be pursued through the process of permitting stabilization measures.

Sincerely,

Udo Wahn
Advisory Executive Committee Member
San Diego County Chapter, Surfrider Foundation

Kristin Brinner
Beach Preservation Committee co-lead

San Diego County Chapter, Surfrider Foundation

Jim Jaffee
Beach Preservation Committee co-lead
San Diego County Chapter, Surfrider Foundation

Laura Walsh
Policy Coordinator
San Diego County Chapter, Surfrider Foundation

APPENDIX D

September 20 2021: Comments to Del Mar City Council on Item 2 SANDAG's presentation to Del Mar City council concerning Del Mar Bluff Stabilization Project

Phone: 858.800.2282 | info@sandiego.surfridersd.org | surfridersd.org
3900 Cleveland Ave., Ste B, San Diego, CA 92103

Sep 20, 2021
Delivered via email
To: Del Mar City Council

Re: Item #2 Presentation By SANDAG on Del Mar Bluff's Project

To the members of the Del Mar City Council —

The Surfrider Foundation is a non-profit, environmental organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches for all people, through a powerful activist network. The Surfrider Foundation San Diego County Chapter has more than 2,300 members, many of whom enjoy Del Mar's coastline. Stabilization of the Del Mar section of the LOSSAN corridor railroad tracks is already having severe impacts on the city's coastline and coastal access, and we submit the following comments related to the bluff stabilization update.

Extreme bluff stabilization plans must adjust to a rapidly accelerating relocation timeline

[Right: A photo by a Del Mar resident depicts extensive emergency work in 2021]

Del Mar's bluffs are already severely affected from emergency stabilization work. Natural geology, coastal access, and bluff habitat have been affected in the long-term in multiple places. Surfrider is highly concerned that the SANDAG's long-term plans for Del Mar Bluff Stabilization Project Phase 5 & 6 will continue to mar the bluffs without having been adjusted to consider the advancing

timeline of the Del Mar Realignment Project.

In the past two years, the Del Mar Realignment Project (which will relocate the railway off the bluffs) has gone from a concept championed by some regional stakeholders to one with widespread political support. Support for realignment was pledged extensively at the first San Diego Regional Rail Corridor Executive Leadership Task Force in April 2021. Additionally, the City of Del Mar pledged its support in a letter to Surfrider dated August 24, 2021. SANDAG has also included plans for realignment in its Regional Transportation Improvement Program, which was adopted by SANDAG's Board of Directors on February 26, 2021.

Many regional stakeholders including Surfrider are advocating for SANDAG to activate the realignment within the next 7 years — by the time President Biden leaves office. The blufftop and blufftoe work being proposed by SANDAG as interim stabilization will come with extensive negative tradeoffs for public access and public beaches; in particular the quarter mile of seawall being proposed will significantly erode and block access to Del Mar's special public beaches.

DMB5 and DMB6 were designed to stabilize the bluff for thirty years and therefore far exceed necessary measures for stabilizing the bluff for the next seven years, as the new timeline for Realignment calls for. **The current bluff stabilization proposals therefore should either be scaled back accordingly, or the public must be assured that mechanisms exist to reevaluate the scope of this work.**

Surfrider recommends that the City requests that SANDAG commit to reevaluating the Del Mar Bluffs Phase 6 (DMB6) proposal in three years, based on updated information about the alignment alternative selected, its completion timeline, and funding. DMB6 is not scheduled to be initiated until 2026, so postponing DMB6 proposals until 2024 would allow the agency time to reevaluate its hard armoring plans and update the appropriate permit applications.

In addition to reevaluating the scope of DMB5 and 6 at appropriate intervals to adjust to the realignment timeline, we maintain the priorities outlined in our letter to City Council on July 26, 2021:

- **Bluff stabilization infrastructure must be removed as soon as possible, and a funding and concept plan for seawall removal must be guaranteed upfront**. Beach destroying seawalls must not outlive their intended purpose.

- **Significant bluff stabilization activities warrant significant mitigation efforts.** The erosion rates SANDAG is using to justify the need for bluff stabilization efforts in the first place must also used as a foundation for mitigation calculations.

- **Mitigation should be in the form of projects, with safe crossings incorporated.** Surfrider recommends that SANDAG include mitigation project proposals as part of its DMB5 federal consistency application to the California Coastal Commission. SANDAG's proposals should be project specific, and they should be reviewed as part of the Coastal Commission's federal consistency determination on this project so that the public and the City of Del Mar have the appropriate opportunity to participate in the project selection process. City Council should consider accelerating the Coastal Connection Study timeline so the related results pertaining to possible mitigation options can be explored in the federal consistency review for DMB5. Mitigation should include opportunities for coastal access in the form of safe crossings.

Conclusion

[Right: Proposed Work in DMB5 may include extensive seawalls, DMB5 Alternative Analysis Report[1]]

SANDAG's emergency and interim bluff stabilization work, as well as its diligence in realignment, will affect the coast and coastal access in the City for the foreseeable future. We strongly encourage the City Council to avoid beach destroying stabilization measures to the extent possible, particularly by tying interim stabilization measures to the lifetime of the tracks in their current location. Where this

Figure 44 - Existing Conditions

Figure 45 – Construction of improvements at the bluff top only

[1] https://drive.google.com/file/d/1fYIry8ya_pv6Uo2vPfq2aST97NONpRPJ/view?usp=sharing

cannot be done, meaningful steps towards mitigation for these disastrous projects must be pursued.

Sincerely,

Udo Wahn M.D.
Advisory Executive Committee Member
San Diego County Chapter, Surfrider Foundation

Kristin Brinner
Beach Preservation Committee co-lead
San Diego County Chapter, Surfrider Foundation

Jim Jaffee
Beach Preservation Committee co-lead
San Diego County Chapter, Surfrider Foundation

Laura Walsh
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San Diego County Chapter, Surfrider Foundation

APPENDIX E

June 3, 2022: Comments to the California Coastal Commission on Item W7b, CC-0005-2, Coastal Commission Federal Consistency Determination concerning Del Mar Bluff Stabilization Project

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June 3, 2022

To: Donne Brownsey, Chair, California Coastal Commission
Cc: John Ainsworth, Executive Director, California Coastal Commission

Re: Item W7b, CC-0005-21 (San Diego Association of Governments, San Diego Co.)

Dear Chair Brownsey and Commissioners,

The Surfrider Foundation (Surfrider) is a nonprofit grassroots organization dedicated to the protection and enjoyment of the world's ocean, waves and beaches, for all people, through a powerful activist network. Our San Diego Chapter is deeply involved in railroad protection and relocation issues in Del Mar. We have also been engaged in state and local decisions related to previous phases of Del Mar Bluff Stabilization (DMB) work, as well as more recent local conversations related specifically to DMB Phase 5.

Surfrider San Diego County is a member of the Los Angeles – San Diego – San Luis Obispo (LOSSAN) Regional Rail Corridor Working Group and the San Diego Shoreline Preservation Committee. We were part of Del Mar's Sea Level Rise Technical Advisory Committee that led sea level rise discussions related to Del Mar's Local Coastal Program Update process beginning in 2015. Our comments on DMB5 are consistent with our goal to see Del Mar plan for sea level rise to protect coastal access, coastal recreation, and marine resources in the most effective way, given current conditions affecting the safety and operability of the railroad.

We support the staff recommendation to make a conditional consistency determination for this project, but propose a number of critical suggestions to meet the needs of this community given the proposed project's extreme impacts.

Surfrider recognizes the need to stabilize the Del Mar section of the LOSSAN corridor and appreciates that the San Diego Association of Governments (SANDAG) and Coastal Commission staff have worked hard to reduce project impacts.

However, we cannot overstate the impact of this project to Del Mar's beaches and bluffs. Anticipated impacts can be found inconsistent with Sections 30251, 30253, and the access policies of chapter 3 of the Coastal Act (at a minimum) unless proper conditions are accepted in the Consistency Determination.

Del Mar's special bluffs, beaches, and waves are cherished by locals and visitors from throughout San Diego County, the State of California, and the country. Certain aspects of DMB5 — like the upper bluff stabilization, which can never be undone — will degrade the natural coastline in one of Southern California's quintessential beach towns far beyond the lifetime of this permit. Any permit extensions will also perpetuate related impacts.

Executive Summary

- To meet the specifications of Coastal Act Section 30253 and 'mitigate' damage, the project must facilitate relocation of the railroad.

- We recommend a number of suggested amendments to support relocation that are aimed at clarifying intentions to remove the proposed ½ mile of seawall.

- We support the staff report in pursuing a project design based on low-risk sea level rise scenarios because this supports the commitment to relocate the tracks.

- SANDAG has not provided environmental documentation to support a thorough analysis of the project proposal. The Commission should maximize public access opportunities so that the mitigation proposal is consistent with the access and recreation policies of Chapter 3 of the Coastal Act.

- We support the Capital Improvement Projects (CIP) proposed and recommend safe crossings at both 7th and 11th street. These projects are critical for securing access in spite of construction, proposed fencing, and armoring and should not be scaled back under any circumstance.

- The vertical access trails should benefit from a long-term rail to trail program.

- We recommend interim public access projects on Torrey Pines State Beach to address the seven year or more gap during which the CIP projects are not completed.

- The wetland mitigation ratio should be 4:1. The .28 acres of wetland habitat affected by this project are some of the last remaining intact wetlands in California.

- We request clarity around where and when rolling construction takes place so the schedule can be clearly understood by the community.

This project is devastating to Del Mar's bluffs and beaches

Approval of this permit includes the authorization of half a mile of seawall (2,500 feet) for 30 years, the permanent grading and upper bluff stabilization of approximately three quarters of a mile of bluff, and the construction of at least five stormwater outfalls.

Related impacts include:

- Construction activities taking up beach space and blocking access on Del Mar and State Park beaches for as long as three years**.** This impact could be found to be inconsistent with Sections 30210, 30211, 30212, 30220, 30221 of the Coastal Act and Section 4 of Article X of the California Constitution.

- Loss of beach access at 7th and 11th Street for up to seven years — or longer if other agencies do not comply with permit terms. This impact could be found inconsistent with Sections 30210, 30211, 30212, 30220, 30221 of the Coastal Act and Section 4 of Article X of the California Constitution.

- Narrowing of large stretches of beach and disappearance of lateral access along the beach caused by the placement of seawall and rip rap backfill for up to 30 years, with permanent narrowing of the beach expected in the future due to accelerated erosion and sea level rise. This impact could be found inconsistent with Sections 30210, 30211, 30212, 30220, 30221 of the Coastal Act and Section 4 of Article X of the California Constitution.

- Permanent loss of habitat along natural bluffs and on beaches, with temporary loss guaranteed during three years of project construction. This impact could be found inconsistent with Section 30240 of the Coastal Act.

- Drastic visual change to the bluffs, particularly due to the seawall visible to all beachgoers including surfers and boaters in the water for up to 30 years.This impact could be found inconsistent with Sections 30251 and 30253 of the Coastal Act.

- Potentially increased erosion, water quality contamination, and rip currents caused by the construction of five stormwater outfalls. This impact could be found inconsistent with Section 30231 of the Coastal Act.

- Permanent loss of .28 acres of some of California's last remaining wetlands.
  This impact could be found inconsistent with Sections 30233, 30231 and 30255 of the Coastal Act.

In light of these major impacts, we suggest mitigation opportunities and make recommendations to ensure accountability and transparency throughout the process:

The benefit of this project is that it can facilitate improved coastal access and long-term managed retreat

Surfrider can live with basic aspects of this project because it memorializes and motivates relocation of the LOSSAN railroad, which should never have been located on Del Mar's fragile and eroding bluffs in the first place. Further explanation is in our letter to this Commission related to emergency bluff work in 2020[1]. As this staff report points out, SANDAG committed to relocating the Del Mar section of the LOSSAN corridor by 2035 (memorialized in its 2021 San Diego Forward Regional Transportation Plan) due to the fact that the rail faces increasing coastal hazards from sea level rise and erosion in the near and long-term.

Relocation of the railroad tracks provides an extremely rare and important opportunity to allow space for Del Mar's coastline to migrate landward as sea levels rise. It will also secure public recreation, viewing, and access opportunities along the former rail corridor in the future. If successfully managed, this project will be a nationally significant case study, where today's permit represents one step along an adaptation pathway towards managed retreat of critical infrastructure and restoration of an otherwise highly developed area onan eroding shoreline.The site is unique in San Diego County as one of the few areas along coastal bluffs where existing development would no longer be threatened once the rail is relocated.

This project can be found consistent with the Coastal Act, the Coastal Commission's Sea Level Rise Guidance, and the Coastal Commission's Guidance on Critical Infrastructure **only insofar as it facilitates relocation and provides mitigation for both short and long term access impacts**.

It is obvious that this project contravenes many Coastal Act policies, including 30253 and 30251, as well as access policies in Sections 30210, 30211, 30212, 30220, 30221 of the Coastal Act and Section 4 of Article X of the California Constitution.

The justification for the project rests on the provision of Coastal Act Section 30235, which allows the Coastal Commission to permit armoring "*when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply*."

However, Section 30253(2) of the Coastal Act requires that new development shall not contribute to erosion nor "*require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*" While hard structures provide temporary protection against the threat of sea level rise, they disrupt natural shoreline processes, accelerate long-term erosion, cause loss of beach and other critical habitats and corresponding ecosystem benefits, as well as impair beach access and recreational uses. Therefore, armoring must be avoided or, in this instance, used for a minimized and time-certain duration.

[1] https://documents.coastal.ca.gov/reports/2020/8/W13b/W13b-8-2020-correspondence.pdf

Relocating the train is a practical way of meeting the requirement to mitigate adverse impacts of this project, and SANDAG has already committed to this intention in its Regional Transportation Plan.

In order to facilitate rail relocation, critical adjustments to the staff report need to be made in order to ensure accountability and feasibility — we make those suggestions in later sections of this letter. We note here however that the goal of managed retreat is both ambitious and imperative, and we generally support staff in their assumption that retreat will be achieved by 2035 with flexibility through 2053 (which captures the 30 year permit timeline.)

Because of this permit timeline, Surfrider concurs with staff that in this particular instance, SANDAG should not be held to design this critical infrastructure project to meet the standards of the H++ risk aversion sea level rise scenario. We take note that the Commission's Sea Level Rise Guidance recommends analyzing critical infrastructure under the medium high-risk aversion and extreme-risk aversion scenarios because of its typically long design life, low adaptive capacity, and the high consequences associated with its failure; all of which apply to this project. While we strongly agree with this concept generally, the added variable of SANDAG's commitment to relocate the train drastically shortens the otherwise long design life of this type of project. We agree that a 1 in 20 and low-risk aversion scenario is more appropriate when the design life of the project is the next 30 years, as this allows for a calibration of the project design that reduces impacts to coastal resources and coastal access while still managing risk.

We do also note that it is important to interpret the Commission's Sea Level Rise Guidance[2] in context. The Guidance provides that the Commission must consider critical infrastructure projects on a case-by-case basis, and that projects that facilitate relocation are preferred:

Chapter 7: Adaptation Strategies includes a goal regarding special considerations for protecting transportation infrastructure which states that applicants should:

> "Develop or update a long-term public works plan for critical facilities to address sea level rise: Develop a long-term management plan to address the complexities of planning for sea level rise that incorporates any potential maintenance, relocation, or retrofits and structural changes to critical facilities to accommodate changes in sea level, and obtain Coastal Commission certification." (page 140, California Coastal Commission Sea Level Rise Guidance)

The Guidance similarly supports incremental changes to transportation networks specifically to facilitate realignment:

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2 https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf

> “Allow for phased implementation of realignment and relocation projects: In some cases it may be necessary to make incremental changes in transportation networks so that access to and along the coast can be maintained while also addressing coastal hazards over the long-term” (page 141, California Coastal Commission Sea Level Rise Guidance)

We strongly support the staff report in working towards its own adopted SLR Guidance and memorializing the legally binding aspects of SANDAG’s policy commitment to relocate the Del Mar section of the LOSSAN corridor by 2035.

Environmental documentation is missing

The Staff Report notes that DMB5 is categorically exempt from the NEPA and CEQA process. Additionally, SANDAG has made clear that there is a pressing need to embark on this project before the next rainy season, given the bluff failures that have resulted in emergency work in recent years.

While Surfrider notes the intense efforts and collaboration that have been pursued to achieve the proposal outlined in the staff report, we note the following as important environmental documentation that is noticeably not part of the report:

- Identification of an environmentally superior alternative - Including potentially an entirely different alternative; perhaps one that includes a ‘phased’ component to seawall installation

- Lack of Coastal Connections Study - SANDAG has failed to complete the Coastal Connections Study within the timeframe provided by its DMB Phase 4 permit. This staff report is therefore unable to include information about the public access projects being proposed in this project, which would otherwise help determine whether or not appropriate public access mitigation can be provided on a reasonable timeline.

- Risk assessment information justifying the location, extent, and needed timing of stabilization measures - Currently SANDAG appears to be justifying the accelerated timeline of the project on the fact that recent bluff failures have occurred in areas that were previously identified as ‘low risk.’ This broad swath approach to stabilizing the entire bluff is reactive and most likely over-assumes risk in certain areas, which will ultimately come at the consequence of coastal resources and coastal access.

Without these environmental documents, it is extremely difficult for Surfrider and the Commission to determine whether or not the current proposal represents the least environmentally damaging and feasible alternative. It is also difficult to determine whether the proposed mitigation, monitoring and reporting efforts are sufficient.

In light of these missing environmental documents and analysis, we submit that the most important step the Commission can take to finding Coastal Act consistency in this case is to secure maximum reasonable mitigation opportunities for this enormously consequential project. Below, we suggest mitigation opportunities and make recommendations to ensure accountability and transparency throughout the process.

Recommendation #1 - Make adjustments to support relocation

As has been discussed, this project can only meet Coastal Act requirements and the Commission's Sea Level Rise Guidance requirements by reaffirming SANDAG's already formal commitment to relocation of the Del Mar Section of the LOSSAN corridor by 2035. We suggest the following adjustments:

1a. Staff Report Language on Relocation and Automatic Extensions - We ask that staff make a minor adjustment to the report so as not to undermine SANDAG's commitment to relocate the track by 2035. It is possible to justify the 30-year permit timeline without undermining SANDAG's formal policy language in its RTP. For instance, the discussion on page 10 of the staff report states:

> "SANDAG is currently in the process of planning to relocate the tracks consistent with the regional transportation plan; however, given the magnitude and complexity of that effort and outstanding funding needs for final design, environmental review, and construction, implementation of the relocation would likely extend beyond the target date of 2035."

This should be amended to replace the phrase 'would likely' with 'may,' at a minimum. We suggest further amendments to acknowledge the difficulty of relocation, while adding language such as the below:

> "However, SANDAG has made a formal commitment in its Regional Transportation Plan that commits the agency to relocating this rail by 2035."

Surfrider also has concerns with the potential for undue delay given the automatic extensions currently granted in the conditional approval. Surfrider suggests the report implement a condition that addresses authorization term without allowing for automatic extensions upon application submission so that the project is not unduly delayed. We appreciate that Condition One otherwise memorializes the commitment to relocate the track by 2035.

1b. Removability of Seawalls - The removal of the seawalls permitted in this project is a critical step towards relocation, which allows for mitigation of lost public access and recreation. We make the following recommendations to strengthen the requirements for removable seawalls:

- Adjust conditions on authorization terms to remove rail abandonment aspects. Condition 1a states that the authorization of seawalls included in the consistency certification shall expire in 30 years or upon relocation and legal abandonment of the sections of railroad at issue in this action, whichever occurs first. We suggest amending this language to require the seawalls to be removed after 30 years or when the rail line is no longer in service. The North County Transit District (NCTD) may never formally abandon this section of rail — for instance NCTD still leases portions of its property to the City of Del Mar near the Del Mar Fairgrounds, though that area has not received rail service in decades. This condition should also clarify that the legally permitted purpose of the seawall may only pertain to bluff stabilization as long as rail service continues.

- Clarify whether the current seawalls will also be removed as part of the project. Surfrider assumes that the temporary and emergency seawalls that have been constructed by SANDAG through previous permits will also be removed when the rail is no longer in service. Removal of these seawalls will also be necessary to achieve the goals of a larger managed retreat effort. This should be clarified through Authorization Term conditions.

- The Commission should add a condition that the seawall is constructed only to protect the railroad and any other existing or future development cannot rely on the permitted seawall to establish geologic stability. Failure to include this type of special condition may result in SANDAG or other property owners claiming that continued authorization of the seawalls is necessary to accommodate existing or additional development.

- The Commission should add a requirement that SANDAG work with the City of Del Mar to develop a formal notification procedure to inform current and future blufftop property owners that the seawalls are temporary and will be removed by the end of the permit term. This will serve to negate any legal takings claims when the seawalls are scheduled for removal and prohibit any future claimed reliance on the seawalls to protect private property.

- The Commission should consider an opportunity to delay seawall construction as long as possible. Surfrider understands that the various components of the stabilization project (upper bluff stabilization, bluff toe stabilization, and other irrigation efforts) all work together, but bluff toe stabilization specifically manages wave overtopping caused by storm surge that is exacerbated by sea level rise. It is unclear whether or not the current seawall designs are necessary to meet today's erosion impacts to the bluff toe. If the seawalls are designed to mitigate risk that is forthcoming, then the seawalls can be permitted today with an agreement about a phased, trigger-based installation at a later date. This would reduce the impacts of the seawall on erosion, which will immediately extend the back of the beach seaward on some parts of the beach and compound erosion and access issues over time.

- The Commission should include a condition that SANDAG work with Scripps Institution of Oceanography to employ advanced geophysical instruments and utilize the data from their coastal LiDAR surveys to track bluff erosion and monitor slope stability at the site.

Recommendation #2 - Adjust public access mitigation proposals to be consistent with access and recreation policies of Chapter 3

Surfrider appreciates the capital improvement projects that have been suggested in the staff report. In particular, safe crossings at 7th Street and 11th Street as well as vertical access trails would be an improvement to the current situation of unsafe and insecure access to the walkable beach and enjoyable waves in the area.

We agree generally with staff that it is not possible to 'buy back a beach' in this area to provide in-kind mitigation for the dramatic impacts that this project will have on beach erosion and lateral beach access, as well as both vertical and lateral access throughout construction. If public access mitigation is the only available form of mitigation as in-kind mitigation is not possible, and if the project is missing necessary documents (as described above) that would be required to fully find Coastal Act Consistency, the Commission should seek to maximize public access as mitigation.

In the past, mitigation for seawall impacts over time was provided by payment of recreation fees to account for lost beach area.[3] Similar fee programs should be considered, perhaps for an endowment fund to manage the vertical trails (mentioned later). In contrast to previous fee programs that only mitigate for lateral access and placement loss, the DMB5 project must also mitigate for additional loss of vertical beach access from the blufftop to the beach and for lateral access along the beach. In order to address these impacts, additional mitigation is required to meet the nexus test of the impact. Simply rebuilding existing vertical access while access is lost for many years does not mitigate all impacts commensurately. Both vertical and horizontal access must be mitigated in the short and long term in order to meet the nexus tests of the Nollan and Dolan cases[4].

We note that even the current staff recommendation affords SANDAG up to seven years to complete the proposed capital improvement projects. Given that these projects may hinge on approvals from the North County Transit District and California Public Utilities Commission, it could take even longer. It is unreasonable that the City of Del Mar and the over 2 million annual Del Mar beach visitors should fail to benefit from public access mitigation for seven years or more. We suggest the following adjustments to help mitigate this scenario and provide further suggestions for mitigation opportunities:

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[3] See for example Land Use Plan (LUP) Amendment #LCP-6-SOL-16-0020-1 (Public Recreation Fee), CDP 6-05-072/Las Brisas Recreation Fee and CDP 3-02-024/Ocean Harbor House.

[4] See Nollan v. California Coastal Comm'n, 483 U.S. 825, 107 S. Ct. 3141, 97 L. Ed. 2d 677 (1987) and Dolan v. City of Tigard, 512 U.S. 374, 114 S. Ct. 2309, 129 L. Ed. 2d 304 (1994).

1 - Strengthen mitigation project opportunities. The capital improvement projects suggested in the report are critical for securing access in spite of construction, proposed fencing, and armoring. These projects should not be scaled back under any circumstance. To maximize the benefits of public access mitigation, we strongly urge the Commission to require vertical access and safe crossings at both 7th and 11th Street - not one or the other. Both of these are currently popular accessways that facilitate surfing, walking, and beach enjoyment over more than a mile of beach. There is a recognized surfing reef at 8th St. in Del Mar and 11th St. offers a unique peak as well.

2 - Include interim project opportunities in addition to the capital improvement projects. Much of the staging for this project occurs on Torrey Pines State Beach, and no public access mitigation has been suggested in this staff report. Surfrider suggests working with State Parks to make two public access improvements to Torrey Pines, which would provide some mitigation for State Parks access and possibly address the 7 year or more gap in which SANDAG could fail to provide access.

2a. Project #1 - We suggest working with State Parks on a project concept to create a living shoreline near the highbridge between Los Penasquitos Lagoon and Torrey Pines State Beach. The maintenance of the beach under the bridge is important for visitors coming from the North Torrey Pines parking lot, and is a valued access point for on duty lifeguards and for Junior Lifeguards practice. The beach in this area is vulnerable to high tides because of its location near the lagoon, the local geomorphology, and the fact that the substrate (which is fill from the historic rail construction) is very soft. In the past, State Parks has maintained the beach by inlet dredging but this area is a good opportunity for a more resilient living shorelines project with cobble toe. Funding is needed to haul the sand and cobble from the lagoon and would also assist with annual planned inlet maintenance. Such a project would make the area more resilient, provide critical public safety and public recreation access, provide an access point for Rail ROW maintenance and repair, and be designed to maximize habitat and resilience. It could also be completed in the near term and serve as a multi-benefit coastal resilience pilot project in the City of San Diego.

2b. Project #2 - State Parks has also identified three areas along Torrey Pines Road where a staircase would be useful for facilitating public access to the beach. This section of the beach is often physically separated from the southern part of the beach when the lagoon is breached. People who are trying to cross to the other section of beach, or who parked in the parking lot near the lagoon, would be able to access the beach considerably quicker than is currently possible. At least one option for a staircase in this area would not require armoring and would provide faster access to the beach for public safety and maintenance staff. This project could also potentially integrate with the City of San Diego's goals to construct an ADA beach access in the area.

3. Require SANDAG to report on CPUC and NCTD successes - The safe crossings at 7th and 11th Street will require California Public Utilities Commission (CPUC) and NCTD approval, where approval could fail to be provided or extend the timeline of this project. The Coastal

Commission should hold SANDAG to account in making a robust effort to secure these approvals. We recommend including a condition requiring SANDAG to show and report on robust efforts to secure approvals from both of these agencies.

4. Ensure that public access benefits remain after project is gone. The staff report is unclear on what will happen to the vertical accessways once the permit expires and the seawalls are removed. Surfrider supports maintaining these accessways even while a larger relocation effort is pursued. We recommend SANDAG be required to implement a formal rail to trail program, which would perhaps set up a process for transferring ownership such as through the establishment of an endowment fund that the City of Del Mar, State Parks, or some other entity could use to assume management of the trails in the future.

Recommendation #3 - Adjust wetland mitigation

The .28 acres of wetland habitat affected by this project are some of the last remaining intact wetlands in California. They are home to endangered species and habitat to native flora and fauna, and they provide carbon sequestration benefits. In a May 26th SANDAG presentation to the City of Del Mar Design Review Board, a statement was made by SANDAG that impacts to ospreys are not a concern and that they feed in the San Dieguito lagoon. This is inaccurate. Ospreys, peregrine falcons, crabs, and many other species use the tidal zone for feeding.

It is also unclear why staff has chosen a 1:1 mitigation ratio for wetlands when it is more common to use a ratio of 4:1. We suggest a minimum 4:1 ratio based on the Commission's own Procedural Guidance for the Review of Wetland Projects in the California Coastal Zone, which states that a "wetland mitigation ratio in excess of one to one" should be used and that a higher mitigation ratio helps to compensate for wetland acreage and functional capacity lost at the specific site. Given that the recommendation is fee-based, we recommend applying this funding to the suggested project at Torrey Pines, which affects the Los Peñasquitos Lagoon.

Recommendation #4 - Communications for transparency

We suggest making some adjustments to better communicate the impacts of this project to community members. In particular, we suggest clarifying:

The project construction timeline - We are under the impression, but it is not clear from the staff report, that construction will occur on a rolling basis to address areas marked in the staff report as high priority, then medium, then low. SANDAG should be required to clarify which sections of the bluffs are being worked over time, and this information should also be stated in the staff report.

Project endurance - It is not stated anywhere in the staff report that the upper bluff stabilization is, in fact, permanent. This is of significant consequence to those who care about the natural features of the bluff. This should be stated clearly in the report. The state of the soldier piles,

connecting grade beams at the surface and tie backs as they become exposed should also be further discussed.

Conclusion

Thank you for your consideration of these requests. We hope to see coastal resources and access recovered in Del Mar in the long-term upon inclusion and consideration of these permit adjustments for finding conditional concurrence for Coastal Act consistency.

Best,

Laura Walsh,
California Policy Manager
Surfrider Foundation

Mitch Silverstein
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Jim Jaffee
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Kristin Brinner
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Attachments: TPCPB NOP Response 2025 FINAL combined.pdf

From: mikehalpern@yahoo.com <mikehalpern@yahoo.com>
Sent: Wednesday, June 18, 2025 10:51:01 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: lheebner@cosb.org <lheebner@cosb.org>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; jminto@cityofsanteeca.gov <jminto@cityofsanteeca.gov>; kevin.shin@carlsbadca.gov <kevin.shin@carlsbadca.gov>; cchavez@chulavistaca.gov <cchavez@chulavistaca.gov>; jduncan@coronado.ca.us <jduncan@coronado.ca.us>; tgaasterland@delmar.ca.us <tgaasterland@delmar.ca.us>; bwells@elcajon.gov <bwells@elcajon.gov>; behlers@encinitasca.gov <behlers@encinitasca.gov>; Dane@danemwhite.com <Dane@danemwhite.com>; jack.fisher@imperialbeachca.gov <jack.fisher@imperialbeachca.gov>; marapostathis@cityoflamesa.us <marapostathis@cityoflamesa.us>; asnow@lemongrove.ca.gov <asnow@lemongrove.ca.gov>; Lmolina@nationalcityca.gov <Lmolina@nationalcityca.gov>; esanchez@oceansideca.org <esanchez@oceansideca.org>; svaus@poway.org <svaus@poway.org>; mayortoddgloria@sandiego.gov <mayortoddgloria@sandiego.gov>; rjones@san-marcos.net <rjones@san-marcos.net>; kmelendez@cityofvista.com <kmelendez@cityofvista.com>; joel.anderson@sdcounty.ca.gov <joel.anderson@sdcounty.ca.gov>; terra.lawson-remer@sdcounty.ca.gov <terra.lawson-remer@sdcounty.ca.gov>; Mario Orso <mario.orso@sandag.org>; jpreciado@chulavistaca.gov <jpreciado@chulavistaca.gov>; darren.smith@parks.ca.gov <darren.smith@parks.ca.gov>; mikehastings1066@gmail.com <mikehastings1066@gmail.com>; rickgulley1@icloud.com <rickgulley1@icloud.com>; lisasierraclub@gmail.com <lisasierraclub@gmail.com>; hogansierraclub@gmail.com <hogansierraclub@gmail.com>; Alison.Feinswog@mail.house.gov <Alison.Feinswog@mail.house.gov>; Scott.peters@mail.house.gov <Scott.peters@mail.house.gov>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; alex.davis@sen.ca.gov <alex.davis@sen.ca.gov>; diana.kutlow@sen.ca.gov <diana.kutlow@sen.ca.gov>; rebecca.smith2@sdcounty.ca.gov <rebecca.smith2@sdcounty.ca.gov>; DAkers@sandiego.gov <DAkers@sandiego.gov>; famaciel@sandiego.gov <famaciel@sandiego.gov>; 'Garcia, Government Affairs Manager' <juliog@sandiego.gov>; jquintero@sandiego.gov <jquintero@sandiego.gov>
Subject: TPCPB Comment Letter: SDLRR Updated Notice of Preparation

Please find attached the City of San Diego's Torrey Pines Community Planning Board's comment letter on the SDLRR Updated Notice of Preparation.

TORREY PINES
COMMUNITY PLANNING BOARD

June 18, 2025

SANDAG
1011 Union Street, Suite 400
San Diego, CA 92101
ATTN: LOSSAN Comments

RE: 2025 Notice of Preparation (NOP) Draft EIR, LOSSAN Rail Realignment Project Public Comments

Dear SANDAG LOSSAN Team:

The Torrey Pines Community contains some of the most well-known, diverse habitats in the County. Our sensitive coastal resources, including those of the Torrey Pines State Natural Reserve are known throughout the world and have made our community a visitor-serving destination that extends benefits far beyond its boundaries and those of the city. Whatever is done regarding the rail line relocation, it must prioritize the preservation of these resources, including the preservation of the visual integrity of the Torrey Pines State Natural Reserve viewshed, for the benefit of present and future generations to come.

The Torrey Pines Community Planning Board (TPCPB) appreciates SANDAG's decision to remove the Portofino portal from further consideration in early 2024, prior to issuing the June 2024 NOP. We would like to thank SANDAG's staff for again removing the damaging Portofino portal from consideration following its reemergence in the recent Value Analysis study. It was the right decision for the environment and the community and will help to preserve the visual integrity of the Torrey Pines State Natural Reserve viewshed.

We are proud of our work with you to identify the "I-5 Knoll" as a superior location for the southern portal, and request that you suspend further consideration of the Pink Line or Green Line routes[1]. We firmly believe that these options are wrong for the environment and the community, an opinion shared by every environmental or community interest group of which we are aware.

We support all of the conclusions and questions in the attached letter from the Los Penasquitos Lagoon Foundation, and request that it is incorporated into our response. In addition, we note a number of concerns which need to be addressed if the Pink Line or Green Line routes are carried forward into the DEIR:

1) The Yellow Line and Blue Line routes place the southern portal upwind of I-5, but the Pink Line route would place tunnel venting upwind of our community. The DEIR should include a study of prevailing winds and the impact of the tunnel venting on the community. If negative impacts are expected or experienced, how will they be addressed? How will property owners be compensated?

[1] For ease of discussion, this letter will refer to the "San Dieguito Bridge to I-5 Alternative Alignment" as the "Yellow Line"; the "Under Crest Canyon Alternative Alignment" as the "Blue Line"; the "Under Camino Del Mar Alternative Alignment" as the "Pink Line"; and the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" as the "Green Line". This is consistent with the NOP Scoping Meeting presentation on May 29.

2) SANDAG has explained that most construction impacts will occur at the southern portal, with the vast majority of excavated material being removed through that location. With the Yellow Line or Blue Line routes, the construction impacts would be concentrated adjacent to I-5 and a portion of Old Sorrento Valley Road which has been closed to traffic for many years. With the Pink Line route, the construction impacts would be experienced directly by neighboring homes and businesses, the result of over 100,000 truckloads of excavated material traveling on Carmel Valley Road around the clock for a multi-year period. Please include a detailed study of the construction related impacts on these neighborhoods. How will property owners be compensated for these adverse impacts if the Pink Line route is pursued?

3) It is not anticipated that eminent domain will be required for construction work or operations at the southern portal if the Yellow Line or Blue Line routes are pursued, but there is information from SANDAG board member presentations that the Pink Line route would require the taking of 7-10 acres at the southern portal, primarily of local homes. Please provide a detailed map indicating which properties will be taken by SANDAG for each route, along with a detailed map of properties expected to be partially impacted. Please also provide a detailed timeline of when SANDAG expects to remove current occupants from their homes if eminent domain is pursued, along with a detailed timeline of when adverse impacts will be experienced by homes that are not taken.

4) While the Yellow Line or Blue Line routes would likely represent a net improvement to the environment of the Los Penasquitos Lagoon, the Pink Line or Green Line routes would introduce a double track alignment that is substantially higher and wider than the current alignment, as well as penetrating a currently undisturbed area in the NW corner of the lagoon for the proposed new portal for the Pink Line. Please provide quantitative and qualitative analyses of how key views from public and private areas, including those from the Torrey Pines State Natural Reserve, would be affected. If adverse view impacts are anticipated, how would property owners be compensated? How would these property owners be compensated for the increased noise and other adverse impacts during construction and post construction operations?

5) Although not referenced in the NOP, it is our understanding that SANDAG intends to electrify the rail line once plans to convert to a high-speed alignment are complete throughout the area. An overhead pattern of catenary wires would introduce further man-made visual elements into the Torrey Pines State Reserve viewshed, adversely affecting the existing visual environment. This will impact key views to and from the Reserve and visually degrade one of San Diego's most iconic and sensitive coastal resource areas. Considering that the San Diego History Center in Balboa Park has a wall-sized historic photo of this view at the entrance to their photo archives, the desecration of this view is not to be taken lightly. Please provide details of how a future electrified track would be accomplished, including diagrams showing any overhead catenary wire system if anticipated.

6) The NOP does not mention a need for fencing along the new berms to be constructed for the realignment, but it is logical that if trains are to be run at 110 mph across Los Penasquitos Lagoon that fencing will be required along the tops of the berms to prevent wildlife from impeding the trains at high speed. Will fencing be required, where will it be located, and what will be the impacts to wildlife in the lagoon? Will migration patterns be disturbed, and will the visual environment be further degraded as a result of these man-made improvements?

7) The Yellow Line or Blue Line routes would have an area for southern portal construction adjacent to I-5 with no nearby homes in an already environmentally degraded area. In contrast, the Pink Line route would place the portal adjacent to a residential neighborhood with a construction area in an undisturbed area of lagoon. It appears likely that vehicles would utilize the Torrey Pines State Beach North Lot for construction staging and for removing millions of yards excavated material from tunnel boring. Please provide details regarding public access to the Torrey Pines State Beach North Lot and coastal areas, and the impact on neighboring areas if beach users are forced to park in adjacent neighborhoods during construction. Please provide details on these anticipated impacts and whether property owners would be compensated for them. Please provide the same analysis for the Green Line route.

8) At the NOP Public Scoping Meeting on May 29, as well as at numerous previous public and private meetings, SANDAG's staff has made it clear that it is examining alternative alignments for the northern segment of the proposed Yellow Line route. The Board has serious concerns with this segment as it is currently depicted in the NOP, specifically the environmental impacts on Crest Canyon open space and on San Dieguito lagoon, and possible impacts on landowners in the San Diego portion of Racetrack Drive. We fully support the efforts to develop an alignment that will be acceptable for the environment and the community.

In summary, we continue to provide our unreserved support for the I-5 Knoll location for the southern portal. Locating the southern portal at the I-5 Knoll has the widespread community backing that is critical for a project of this magnitude. On the other hand, we see major issues with the Pink Line and Green Line routes, and we strongly encourage you to remove the Pink Line and Green Line routes from further consideration. In addition, we believe the northern segment of the Yellow Line route has significant room for improvement and we support the work you've committed to do to make these changes.

Thank you for your consideration,

Ian Galton
Chair, TPCPB Rail Subcommittee

cc:
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June 18, 2025

File Number: 96LX-390166

VIA E-MAIL ONLY

SANDAG
1011 Union Street, Suite 400
San Diego, CA 92101
Email: lossancomments@sandag.org

Re: SDLRR Updated Notice of Preparation

Dear SANDAG LOSSAN Team:

This firm represents the Los Peñasquitos Lagoon Foundation (the "Foundation"). The Foundation works with the California Department of Parks and Recreation to protect, restore, enhance, and preserve the Los Peñasquitos Lagoon ("Lagoon"), a State Marsh Natural Preserve (PRC § 5019.71) that is part of the Torrey Pines State Natural Reserve ("Reserve"). Since its establishment in 1983, the Foundation has helped lead the effort in restoring, protecting and preserving the Lagoon through stakeholder collaboration and adaptive management informed by 37 years of continuous data generated by our biological monitoring program and partnerships with universities that include the University of California, San Diego and the Scripps Institution of Oceanography. Impacts to the Lagoon caused by transportation infrastructure that includes the current railway alignment have been well documented in scientific papers, aerial imagery, reports and planning documents that include the Los Peñasquitos Lagoon Enhancement Plan and its Program level Environmental Impact Report, certified in 2020. With this in mind, the Foundation appreciates the opportunity to comment on SANDAG's Updated Notice of Preparation (NOP) of a Draft Environmental Report for the Los Angeles-San-Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project ("Project"). The Foundation further appreciates the additional public outreach and analysis that was undertaken in connection with the updated NOP for the Project.

Please consider the following comments regarding the scope and content of the environmental information to be included in the EIR.

1. Present a Single Proposed Project and Consider a Reasonable Range of Alternatives. The EIR should evaluate a single proposed project in detail, and a reasonable range of alternatives to the project that would avoid or substantially lessen the significant environmental effects of the proposed project. CEQA does not permit a lead agency to evaluate multiple alternatives without selecting a proposed project. (*Washoe Meadows Community v. Dept. of Parks & Recreation* (2017) 17 CA5th 277, 288.) The Foundation appreciates that SANDAG considered alternatives to remove the railway alignment from the Lagoon and locate it near Interstate 5, but as it moves toward the EIR stage, it needs to select a single alignment as the proposed project.

While all four alignments described in the NOP have the potential to generate impacts to coastal habitats, cultural resources, listed species, public access and viewsheds, **the Foundation supports alignments utilizing the "Knoll Near I-5" for the southern portal that currently include the "San Dieguito Bridge to I-5 Alternative Alignment" (Yellow Line) and "Under Crest Canyon Alternative Alignment" (Blue Line) and strongly opposes selection of the "Under Camino Del Mar Alternative Alignment" (Pink Line) and the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" (Green Line).**[1] Thus, the Foundation is supportive of the EIR presenting either the Yellow Line or Blue Line as the proposed project. The Pink Line and Green Line would perpetuate and exacerbate significant and unmitigable impacts to the Lagoon and should not be carried forward for further consideration. Both the Pink Line and Green Line should be treated as alternatives "considered but rejected." The Foundation also encourages SANDAG to consider additional alternatives that would avoid or minimize impacts to sensitive coastal resources.

2. The Project Objectives Should Prioritize Restoration and Enhancement of Coastal Resources Impaired by Railway Infrastructure. The Foundation is pleased to see that one of the objectives of the Project was revised to "avoid and/or minimize negative effects, ***and where possible enhance*** biological . . . wetlands, ecological reserves, wildlife or waterfowl refuges, and any publicly or privately owned historic site listed or eligible for listing on the National Register of Historic Places." The Foundation fully supports that one of the primary, fundamental objectives of the Project is to support the restoration and enhancement of Los Peñasquitos Lagoon, a State Marsh Natural Preserve, to meet this stated objective.[2] Therefore, the Project should proceed in a manner that restores the decades of damage the existing rail alignment has caused to Los Peñasquitos Lagoon. The current location of the tracks through the center of the Lagoon would never be considered in a *de novo* application. The placement of the southern portal at the Knoll Near I-5 with the Yellow Line or Blue Line would remove the railroad tracks and berm bisecting the Lagoon and provide an opportunity to correct the unintended consequences of the railway alignment's role in contributing to the degradation of the Lagoon that includes its listing on the Clean Water Act's Section 303(d) list of impaired waterbodies for sediment/siltation due to the existing railway berm that has reduced the Lagoon's tidal prism by cutting off tidal channels and impounded sediment-laden stormwater runoff in the upper Lagoon since 1925.[3] **The Foundation encourages SANDAG to study and carry forward a proposed project that will maximize**

[1] For ease of discussion, this letter will refer to the "San Dieguito Bridge to I-5 Alternative Alignment" as the "Yellow Line"; the "Under Crest Canyon Alternative Alignment" as the "Blue Line"; the "Under Camino Del Mar Alternative Alignment" as the "Pink Line"; and the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" as the "Green Line". This is consistent NOP Figure 3 and the terminology used at the NOP Scoping Meeting presentation on May 29.

[2] See "San Diego LOSSAN Rail Realignment Project Update", NOP PowerPoint presentation prepared by SANDAG, slide 6.

[3] See Cole and Wahl. 2000. A Late Holocene Paleoecological Record from Torrey Pines State Reserve, California. Quaternary Research 53, 341-351; ESA. 2018. Los Peñasquitos Lagoon Enhancement Plan. Prepared for Los Peñasquitos Lagoon Foundation.

restoration and enhancement of coastal resources impaired by railway infrastructure to meet the critical Project Objective to "preserve wetlands."

Proceeding with the Pink Line or Green Line, on the other hand, would perpetuate the railways' negative impacts on the Lagoon and potentially generate additional ones by converting the currently lightly-used single track into a heavily-used double track alignment through the center of the Los Peñasquitos Lagoon, with entirely new areas added at the northwest end. As the NOP states, this would require raising and widening the existing berm in the Lagoon to address flooding and sea level rise projects. The EIR/EIS will need to consider the legacy impacts of the current alignment that have contributed to existing conditions of Lagoon impairment and those that will be generated by implementation of the Pink Line or Green Line, including those that may not be offset by elevating portions of the new double track on additional bridge spans. Additionally, SANDAG will need to consider how their proposed project will impact large-scale restoration of the Lagoon that will be completed prior to realignment of the railway, with the Pink Line and Green Line having the greatest potential for impacts.

There would be new or more severe adverse environmental effects associated with the rail use under the Pink Line or Green Line that include increased noise, vibration, light and other impacts resulting from faster, more frequent train service that would come with double tracking. The analysis of the Pink Line and Green Line should include a detailed discussion of construction-related impacts, including full disclosure of the location of construction staging areas, construction access routes, related impacts on wetlands or other sensitive habitats, the amount and location of additional fill that might be required within or around the Lagoon, the location and impacts associated with the construction of bridge structures in the Lagoon, and the amount and duration of construction-related noise, lighting, vibration and other environmental impacts that will result from construction activities. The Lagoon is prone to flooding during rains – please also describe the measures that will be implemented to protect the construction site during weather events (preventing sediment, debris and construction materials and fluids from leaving the construction site).

The Pink Line or Green Line clearly would not further the stated project objective of "avoid[ing] and/or minimiz[ing] negative impacts, and where possible enhanc[ing] biological, cultural, and recreational resources of national, state or local significance, including publicly owned parks, beaches, wetlands, ecological reserves…" and should be rejected for further consideration on that basis. The Pink Line or Green Line clearly would have significant adverse impacts on the Lagoon and its important biological and wetland resources, which is inconsistent with stated project objectives.

3. <u>The Project Should Avoid Impacts to Sensitive Species and their Associated Habitats to the Maximum Extent Feasible.</u> The proposed project should avoid, or at the very least limit, impacts to sensitive species and their associated essential habitats present within the Lagoon within and adjacent to the project site to the maximum extent feasible. The Yellow Line or Blue Line would avoid much of the Lagoon by relocating the railway alignment adjacent to I-5 with a small portion of adjacent wetland and upland habitat potentially being affected. The Pink Line or Green Line maintain much of or all of the current alignment through the Lagoon while also penetrating an undisturbed area adjacent to the proposed Pink Line portal and expanding the

width and height of the existing rail embankment to accommodate double tracking and sea level rise. As such, the Pink Line or Green Line would likely result in the most impacts to sensitive species and their associated sensitive habitats. Replacing large sections of berm with a bridge proposed as a potential modification to the Pink Line or Green Line may improve conditions beyond their existing state but could present an additional suite of impacts to listed species that forage and nest within the vicinity of the existing alignment due to noise, vibration, lighting and other components associated with construction and subsequent rail use. Based on this, the Foundation requests that the proposed EIR/EIS consider potential direct and indirect impacts to sensitive species within the Lagoon that include light-footed Ridgway's rail, coastal California gnatcatcher, western snowy plover, Belding's savannah sparrow, wandering skipper, yellow-breasted chat, white-tailed kite and other raptors, southern mule deer, *Iva hayesiana*, *Artemisia palmeri*, and *Lasthenia glabrata* ssp. *coulteri.* In addition, the EIR/EIS will need to also consider the direct and indirect impacts to the essential habitats that support these sensitive species which include tidal salt marsh, non-tidal salt marsh, southern maritime chaparral, coastal sage scrub, and coastal succulent scrub. Known locations of some of these listed species is provided in Exhibit A. We also request that analysis of biological impacts consider both benefits and impacts to habitat based on function and value to the Lagoon so that impacts to higher tiered habitat (e.g., coastal salt marsh) are not valued the same as habitat of less value (e.g., impaired wetland, disturbed upland). Additionally, the EIR/EIS should consider the effects of noise, vibration lighting, and rail-related pollution associated with the construction and use of new infrastructure that includes increased rail speed and volume of rail traffic as they impact wildlife movement, sensitive species and the habitats that support both. **How will SANDAG ensure that the project will maximize the avoidance of impacts to sensitive species and their associated essential habitats using both qualitive and quantitative analysis? How will SANDAG mitigate impacts to sensitive species and their habitats that cannot be avoided?**

4. <u>The Project Should Improve Lagoon Hydrology by Reconnecting Historic Tidal Channels and Reduce Impoundment of Storm Water in the Upper Lagoon.</u> The EIR must evaluate the project's impacts on lagoon hydrology and should be designed and carried out in a manner that does not adversely impact the already degraded hydrological function of the Lagoon. The Foundation requests that each alternative be examined in accordance with their ability to improve lagoon hydrology with respect to tidal waters and storm water moving through the system. Special studies need to be conducted to examine the role that the railway berm degrades lagoon hydrology and what improvements (e.g., complete removal, partial removal) could be afforded by each of the proposed Project alternatives. This should be considered for both improving the Lagoon's tidal prism and reducing the retention time of impounded waters from storm runoff that have contributed to the Lagoon's impairment and listing on the Clean Water Act's Section 303(d) list of impaired waterbodies for sediment and siltation. The special studies will also need to consider how each alternative could support or impact large scale restoration the Lagoon that is being pursued for compliance under the Los Peñasquitos Lagoon Sediment Total Maximum Daily Load (TMDL) that focuses on improving lagoon hydrology as a key driver for restoring the Lagoon to its historical native habitats. Furthermore, the EIR/EIS should consider changes to local hydrology from the proposed infrastructure (e.g., rail widening, floodwalls, U-sections, and cut-and-cover features) and their effect on sedimentation and the balance of halophytic and freshwater habitats. **How will SANDAG ensure that the project will improve lagoon**

hydrology by reconnecting historic tidal channels and reduce impoundment of storm water in the upper Lagoon using both qualitive and quantitative analysis?

5. Impacts on Public Access to Torrey Pines State Beach. The Pink Line and Green Line are the only alternatives that will generate impacts to public access and use of Torrey Pines State Beach during the construction of the southern portal, double tracking, and rail realignment adjacent to the Torrey Pines North Beach Parking Lot (North Lot). The North Lot receives approximately 1.8 million visitors annually (based on 2016/2017 fiscal year data) due to its proximity to major roadway infrastructure that includes Interstate 5, Interstate 805, and State Route 56 that make it an easily accessible coastal facility for both nearby communities and those located further inland. The proposed EIR/EIS will need to examine and quantify these impacts since public access to North Torrey Pines State Beach will be limited or precluded during construction. In addition, the proposed EIR/EIS will need to examine how closure and/or limited use of the North Lot will impact the Reserve's other public parking facilities (i.e., Torrey Pines South Beach Parking Lot and upper Reserve parking) that are already under strain from increased demand by park visitors arriving by private vehicles. Secondary impacts associated with the lack of adequate parking facilities should also be examined. In addition to restricting public access to the beach, this could include increasing the emission of toxic contaminants in a sensitive coastal environment. To that end, the analysis should consider the potential loading of metals (e.g., zinc, copper) into Lagoon waters due to more frequent and higher volume from braking of vehicles[4] along Carmel Valley Road with either the Pink Line or Green Line, including the truck trips to remove excavated material from the tunnel-boring operation truck loads. **How will SANDAG ensure that the project will avoid impacts to public access to Torrey Pines State Beach using both qualitive and quantitative analysis?**

6. Opportunities and Constraints for Removing the Existing Railway Berm. The proposed EIR/EIS will need to examine both the opportunities and constraints for removing the existing railway berm in its entirety or in designated sections for the proposed project and all the project alternatives being considered under CEQA analysis. The Foundation requests that technical analysis consider both aquatic and terrestrial environs to assess opportunities and constraints for improving both hydrology and wildlife movement within the Lagoon that are currently comprised by the existing railway alignment, as well as the proposed alignments and their components. Analysis should also consider opportunities within each alternative that optimize the expansion of foraging and nesting habitat of listed bird species that include Belding's savannah sparrow, light-footed Ridgway's rail and California gnatcatcher that are currently fragmented by the existing alignment. Of course, the analysis should also focus on the avoidance of adversely impacting foraging and nesting habitat of those species. Analysis should also examine the potential for beneficial re-use of the current railway alignment should the Pink Line or Green Line not be selected as the preferred alternative. One example for consideration would be to modify the existing berm into a pedestrian and bike path to support multi-modal transportation within the coastal zone, a priority for SANDAG under their Public Works Plan and Transportation Resource Enhancement Program prepared for the LOSSAN Corridor. This would be accomplished by

[4] Many brake pads contain metals that wear away a little by little. The metal breaks down into dust each time you apply the brakes. Brake pads can contain as much as 20 percent copper, which is toxic to aquatic life at the base of the food chain. They also contain lead and zinc. (Source: US EPA)

connecting coastal areas and established regional and local trail networks (e.g., the California Coast Trail) to the commercial areas of Sorrento Valley and the Sorrento Valley Coaster Station. Another potential for beneficial reuse of sections of the existing berm could be used to offset impacts related to sea level rise by providing an onsite source of sediment that could be used to augment elevation profiles of surrounding habitat to ensure that coastal salt marsh and wetland transitional areas are preserved in perpetuity. Should partial or complete removal of the berm result as part of the project, the Foundation strongly advises that all related mitigation efforts to offset impacts to Lagoon resources be focused entirely on the Lagoon rather than an offsite location. **How will SANDAG ensure that the preferred alternative considers both opportunities and constraints for removing the existing railway berm using both qualitive and quantitative analysis? How will impacts be mitigated and where?**

7. Compliance of the Project under Section 4F (U.S. Transportation Act of 1966) and Actions Permitted in a State Natural Preserve. The proposed project will have to consider impacts to publicly owned parks, recreational areas, wildlife and waterfowl refuges, and historical sites to comply with Section 4F of the U.S. Transportation Act of 1966. SANDAG will need to prove that the project it selects under CEQA/NEPA will comply in a manner that "the use of the property will have a *de minimis* impact or that there is no feasible and prudent avoidance alternative to the use of the land, and that the action includes all possible planning to minimize harm to the property resulting in such use." In addition, SANDAG will need to comply with the public resource code as it relates to the management, protection and preservation of a State Natural Preserve (PRC § 5019.71). State Natural Preserves are considered "distinct areas of outstanding natural or scientific significance established within the boundaries of State Parks System units." The purpose of Natural Preserves is "to preserve such features as rare or endangered plant and animal species and their supporting ecosystems, representative examples of plant or animal communities existing in California prior to the impact of Euro-American modifications, geological features illustrative of geological processes, significant fossil occurrences or geological features of cultural or economic interest, or topographic features illustrative of representative or unique biogeographical patterns." Importantly, "Natural Preserves shall be managed to allow natural dynamics of ecological interaction to continue without interference, where possible. Habitat manipulation shall be permitted only in those areas found by scientific analysis to require manipulation to preserve the species or associations that constitute the basis for the establishment of the Natural Preserve." **How will analysis under CEQA/NEPA demonstrate that the project complies with Section 4F of the U.S. Transportation Act of 1966 and the management, protection and preservation of a State Natural Preserve (PRC § 5019.71)?**

8. Impacts on Aesthetics. Potential impacts on public viewsheds and scenic vistas should be evaluated in the draft EIR/EIS for the Project and each alternative with consideration given to ensuring these new features are avoided to the extent feasible and otherwise designed in a manner that is compatible with the surrounding environs. **How will SANDAG ensure that the project will avoid or minimize impacts to aesthetics?**

9. Impacts on Air Quality. The Alignments Screening Report, May 31, 2024, includes tables estimating the number of truck trips for the alignments under consideration, but the estimates appear limited to truck trips for the disposal of construction material associated with tunnels. It does not appear that truck trips have been analyzed for other aspects of the work to be done for

these alignments. Please provide estimates for truck trips for all aspects of each alignment—including, but not limited to, the construction of berms, bridges, site preparation, demolition of homes or other structures, etc. **How will SANDAG ensure that the proposed project will avoid or minimize impacts to air quality using both qualitive and quantitative analysis?**

10. Joint EIR/EIS. The Foundation encourages SANDAG to prepare a Joint EIR/EIS document rather than deferring the NEPA evaluation to a separate, future process. A joint evaluation provides for a more efficient use of resources by SANDAG, the Foundation and other stakeholders, as well as a more comprehensive and coordinated environmental review.

The Foundation's position today is consistent with our letter on this topic to Mr. Veeh dated August 27, 2023; comments on the 2024 NOP in a letter dated July 11, 2024; comments on the results of the Value Analysis Report in a letter dated February 25, 2025; and is consistent with positions expressed by our local environmental and community partners: California State Parks, Torrey Pines Community Planning Board, Torrey Pines Conservancy and Sierra Club San Diego, as well as the feedback you've received from numerous involved environmental community members over the past year of study. Given that the most commonly cited arguments in favor of public transportation involve reducing private transportation's negative environmental impacts, it is only logical that SANDAG's railway realignment be done in a manner which minimizes its negative impacts on Los Peñasquitos Lagoon's fragile environment.

We strongly encourage you to take every opportunity to enhance Los Peñasquitos Lagoon's native and historic environment as you evaluate this project and select an alignment that avoids and minimizes significant adverse environmental effects to the maximum extent feasible. The Foundation appreciates that SANDAG considered alternatives to remove the railway alignment from the Lagoon and locate it near Interstate 5. While all four proposed alignments (Yellow Line, Blue Line, Pink Line, and Green Line) have the potential to generate impacts to coastal habitats, cultural resources, listed species, public access and viewsheds, **the Foundation supports alignments utilizing the "Knoll Near I-5" for the southern portal ("San Dieguito Bridge to I-5 Alternative Alignment" (Yellow Line) and "Under Crest Canyon Alternative Alignment" (Blue Line)) and strongly opposes selection of the "Under Camino Del Mar Alternative Alignment" portal location (Pink Line) and the "Del Mar Bluffs Double Track Reinforced Alternative Alignment" (Green Line).**

Please do not hesitate to contact the Foundation if you would like to discuss this idea further.

Sincerely,

Jennifer Chavez
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Enclosure

cc: SANDAG Board: Lesa Heebner, Chair (lheebner@cosb.org); Joe LaCava, First Vice Chair (JoeLaCava@sandiego.gov); John Minto, Second Vice Chair (jminto@cityofsanteeca.gov); Kevin Shin (kevin.shin@carlsbadca.gov); Carolina Chavez (cchavez@chulavistaca.gov); John Duncan (jduncan@coronado.ca.us); Terry Gaasterland (tgaasterland@delmar.ca.us); Bill Wells (bwells@elcajon.gov); Bruce Ehlers (behlers@encinitasca.gov); Dane White (Dane@danemwhite.com); Jack Fisher (jack.fisher@imperialbeachca.gov); Mark Aropostathis (marapostathis@cityoflamesa.us); Alysson Snow (asnow@lemongrove.ca.gov); Luz Molina (Lmolina@nationalcityca.gov); Esther Sanchez (esanchez@oceansideca.org); Steve Vaus (svaus@poway.org); Todd Gloria (mayortoddgloria@sandiego.gov); Rebecca Jones (rjones@san-marcos.net); Katie Melendez (kmelendez@cityofvista.com); Joel Anderson (joel.anderson@sdcounty.ca.gov); Terra Lawson-Remer (terra.lawson-remer@sdcounty.ca.gov);
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US Congress: Representative Mike Levin (Alison.Feinswog@mail.house.gov); Representative Scott Peters (Scott.peters@mail.house.gov)
CA State Senate: Senator Blakespear (senator.blakespear@senate.ca.gov); Alex Davis, Principal Consultant (alex.davis@sen.ca.gov); Diana Kutlow, District Rep (diana.kutlow@sen.ca.gov)
County of San Diego: Rebecca Smith, District 3 Neighborhood Rep (rebecca.smith2@sdcounty.ca.gov)
City of San Diego, Mayor's Office: Dion Akers, Regional Government Affairs Manager (DAkers@sandiego.gov); Fatima Maciel, Community Representative (famaciel@sandiego.gov)
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SMRH:4917-6435-5917.1

EXHIBIT A

Legend
Belding's savannah sparrow
California gnatcatcher
Least Bell's vireo
Ridgway's clapper rail
Western snowy plover
5
720
360
0
720 Feet

From: Joe Cuviello <joe@cuviello.com>
Sent: Wednesday, June 18, 2025 3:50:04 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Comment to SANDAG regarding the LOSSAN Rail Realignment

My name is Joe Cuviello.

I am a resident of Solana Beach and the HOA Board President of Turfwood in Solana Beach. I speak for the 64 homeowners and over 130 adult residents in my community off Valley Avenue in Solana Beach.

Most of our residents have used the Coaster and Amtrak and look forward to using train service once it is connected to the SD International Airport. We are quite pleased with the current Solana Beach track and station, and we look forward to the currently planned "San Dieguito Double Track and Special Events Platform Project" which will help relieve road traffic in the area during peak summertime events at the SD Fairgrounds.

Most importantly though I would like to share a common sentiment from all the residents of my community, and say that all the commenters from Del Mar that keep saying the "Nothernmost" rail realignment they speak of, that is not in the NOP is "not optimal" as they suggest it is. **Del Mar residents do not speak for Solana Beach residents.** They are speaking in some myopic belief that anything not in their city will be better for the entire county, the region and the state of California. That is simply untrue.

As we hear Del Mar resident after Del Mar resident in meetings make claims that are false and not being vetted for that Northernmost alignment, we are not surprised, but we oppose the NIMBYism going on here. Turfwood community members would ask that SANDAG not give an already eliminated alignment too much consideration just because Del Mar cannot accept commonly accepted engineering principals. That alignment was already removed for valid reasons. Just to review a few reasons why a Northernmost alignment would be inferior to all of the other NOP options:

- The San Dieguito Double Track and Special Events Platform Project, could and should be done as soon as is feasible and what Del Mar residents are suggesting would greatly alter this already planned project in many suboptimal ways.
- Del Mar residents are proposing a more Northerly route cutting into Solana Beach

and are proposing a much more expensive UNDERWATER TRACK to travel under the lagoon. Sending a train under the lagoon is ridiculous and overkill. It would be only the second underwater rail line in the entire Western half of the USA. The Transbay Tube is presently the only underwater train tunnel in the Western half of the USA and is the most prominent one in the nation. To presume we should have an underwater tunnel just to appease Del Mar's over exaggerated fears of the other alignments should not outweigh the financial burdens and all the other factors that make underwater tracks undeniably inferior in this case.

- The maintenance of an underwater tunnel should be calculated and added to the building costs as part of the evaluation if this previously eliminated option does end up in the EIR. As we understand it, maintaining underwater tunnels are extremely challenging and much more expensive than standaard subterrestrial tunnels.

- The grade changes of the alignment options should be considered and sending a train under the lagoon would require more down and up elevation changes for all trains and may have highly negative effects on emissions and fuel usage in the long run.

- The Northernmost realignment would potentially be taking away affordable living apartments on Cedros near Via De La Valle through eminent domain so when Del Mar residents say it would not affect Solana Beach they are wrong.

- The Northernmost alignment would definitely force widening and the removal of a large section of the Highway 101 Rail Trail through the Southern section of Solana Beach.

- The Northernmost option would be sending the train events platform at the Fairgrounds much deeper underground which would make the events platform a near complete waste.

- Closing the fair and horse racing for many years would be hugely consequential to the local economy and is also not preferred by the 22nd Ag District.

- There are thousands of freeway tunnels near and under homes in the USA and in the Western USA. There are thousands of train tunnels under homes and buildings all around the globe and in most major cities. Ignorance is not an excuse and should not drive the choice of what to study in the EIR, and ultimately the Northernmost option should not be studied for anything other than proving it's elimination from the EIR. Otherwise further study of it is a waste of tax dollars for

the many obvious reasons mentioned, most of which is the underwater requirement to send the trains under the lagoon.

As it stands my community slightly prefers the San Dieguito Bridge to I5 Alignment, but we believe the Crest Canyon and the Camino Del Mar Tunnel Routes are certainly viable. We all would like to hear the results of the EIR study for each of the 4 routes proposed and we are not in favor of the No Build Option. Any of the current NOP options make sense and should be studied and then a proper decision should be made without the already excluded Northernmost option proposed by Del Mar residents. The bias of Del Mar residents certainly should not be ignored. We only ask that is not overstated and outweigh the much greater needs of the much larger surrounding area, as well as the entire LOSSAN Corridor.

Thank you.

Joe Cuviello
Joe@Cuviello.com
Turfwood Board President
Turfwood Management Association
Solana Beach, CA 92075

Comments from Individuals

Comments Submitted During Scoping Meeting

SANDAG

San Diego LOSSAN Rail Realignment

Public Comments on Notice of Preparation

COMMENTS

Please use the I-5 Knoll portal. ~~Don't de~~

Why would you destroy Los Penasquitos Lagoon?

Please fill in the information below. Please print clearly.

NAME _____ PHONE NUMBER _____

EMAIL ADDRESS _____ ORGANIZATION _____

CITY _____ ZIP CODE _____ RECEIVE LOSSAN EMAILS? ☐ YES ☐ NO

Thank you for your input!

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COMMENTS

The Northern Yellow Line is the only option for a safer route - away from Homes
NO Eminent Domain
Other options will not be built.

Please fill in the information below. Please print clearly.

NAME SD County Tax Payer

EMAIL ADDRESS

CITY

ZIP CODE

PHONE NUMBER

ORGANIZATION

RECEIVE LOSSAN EMAILS? ☐ YES ☐ NO

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COMMENTS

MARIO - HAS SPOKEN MUCH, THAT THE ~~INITIAL~~ YELLOW LINE ALTERNATIVE - OF ABOUT 5 CURRENT CHOICES - CAN BE MOVED NORTHWARD, A LITTLE

THE YELLOW LINE ALTERNATIVE CAN POSSIBLY BE MOVED MORE NORTHWARD - BEFORE ITS ARRIVAL INTO THE DEL MAR AREA.

HOW IS THIS NEGOTIATION PROCESS GOING? CAN ITS MAP BE MADE AVAILABLE HERE TONIGHT? OR

OR CAN ITS LOCATION POINTS BE BETTER DESCRIBED TONIGHT?

Please fill in the information below. Please print clearly.

NAME JAMES BEERMAN PHONE NUMBER [redacted]

EMAIL ADDRESS [redacted] ORGANIZATION

CITY ZIP CODE RECEIVE LOSSAN EMAILS? ☐ YES ☐ NO

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COMMENTS

CAN THERE BE MORE OPEN DISCUSSION IN HOW THE FUTURE OF HIGHSPEED RAIL FITS INTO THIS FUTURE RAIL PLANNING?

SOME BETTER AND IN FACT- EXPLANATIONS ABOUT THE FUTURE OF FREIGHT THROUGH THIS AREA AND THIS RELATIONSHIP WITH MEXICO.

Please fill in the information below. Please print clearly.

NAME [redacted]

EMAIL ADDRESS [redacted]

CITY _____ ZIP CODE _____

PHONE NUMBER [redacted]

ORGANIZATION _____

RECEIVE LOSSAN EMAILS? ☐ YES ☐ NO

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COMMENTS

It is important that San Diego County has a robust public transit system that will help us meet our climate goals. We should be pushing people to choose transit and get out of their cars. I believe the Crest Canyon route would best serve San Diego Country riders with the goal to double track and make the route from Oceanside to San Diego as straight and fast as possible. Please prioritize transit over roads as we need a better solution to just adding more lanes.

Please fill in the information below. Please print clearly.

NAME Kina Bramlette

EMAIL ADDRESS [redacted]

CITY San Diego ZIP CODE 92130

PHONE NUMBER

ORGANIZATION Ride SD

RECEIVE LOSSAN EMAILS? ☐ YES ☒ NO

Thank you for your input!

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COMMENTS

Sound attenuation @ the Portals
+ Noise
@ Leucadia
Tunnel

Please fill in the information below. Please print clearly.

NAME Eileen Maffucci

PHONE NUMBER

EMAIL ADDRESS

ORGANIZATION

CITY

ZIP CODE

RECEIVE LOSSAN EMAILS? ☐ YES ☐ NO

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COMMENTS

How can SANDAG ensure that the Mitigation Measures (Night Time Lights, Workhours & Noise) that are Listed in the EIR will Be followed & Enforced?

At the N. Torrey Pines Beach project! These Measures were Not followed! We had Bright Lights, noise & workhours outside the Rules - Very frustrating.

Please fill in the information below. Please print clearly.

NAME Jerry JACKSON

PHONE NUMBER [redacted]

EMAIL ADDRESS [redacted]

ORGANIZATION J2 Environmental

CITY Del Mar ZIP CODE 92014

RECEIVE LOSSAN EMAILS? ☒ YES ☐ NO

Thank you for your input!

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Public Comments on Notice of Preparation

COMMENTS

HELLO SANDAG Committee -

My name JACK FLETCHER JAEGER, [redacted], DEL MAR CA 92014

I have lived on the bluff (4th House EAST OF RR Tracks) for 44 years, since 1981.

I have seen many, many multiple efforts by the RR Company / SANDAG and Agencies to reinforce and attempts to STABILIZE the BLUFFS, some MAJOR and significant, others more moderate ("dead man" soldier pillars, columns, etc) NONE of these have been any resemblance of a long term SOLUTION: ALL STRICTLY BANDAIDS !! The project was "SOLD" and pitched as a "BLUFF REMOVAL of the RR TRACKS" It is ludicrous and a legally challengable action IF SANDAG PURSUES KEEPING the TRACKS on the BLUFF.

(PURSUE #1 San Dieguito to I-5)

Please fill in the information below. Please print clearly.

NAME _____ PHONE NUMBER [redacted]

EMAIL ADDRESS JACK Jaeger ORGANIZATION Jaeger Fletcher Property

CITY Del Mar ZIP CODE 92014 RECEIVE LOSSAN EMAILS? ☒ YES ☐ NO

Thank you for your input [redacted]

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COMMENTS

I find the Under Crest Canyon alignment most compelling. It balances speed, access, and cost well.

A huge priority should be leaving space for OCS in the tunnels. This is the proven, gold-standard for rail electrification. I'm deeply skeptical of hydrogen as a sustainable fuel, especially inside the tunnels.

Please fill in the information below. Please print clearly.

NAME Ryan Jerman

EMAIL ADDRESS [redacted]

CITY San Diego ZIP CODE 92107

PHONE NUMBER [redacted]

ORGANIZATION

RECEIVE LOSSAN EMAILS? ☐ YES ☐ NO

Already signed up

Thank you for your input!

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COMMENTS

The presentation on 5/29 did not cover the problem of vibration & who it will affect. I was told that 300 ft will not present vibration by an engineer who works on these projects. Studies were not labeled on the maps shown. There was no statement on what homes & businesses would be affected by each choice. These are important information points for those of us in business or with property ownerships. What is the effect each determine will have on the project cost? That was also not addressed. This information is needed to make informed comments. It is obvious any choice will have severe consequences to some.

Please fill in the information below. Please print clearly.

NAME Margie Michaelson

EMAIL ADDRESS [redacted] & mac.com

CITY Del Mar ZIP CODE 92014

PHONE NUMBER [redacted]

ORGANIZATION therapist

RECEIVE LOSSAN EMAILS? ☐ YES ☒ NO

Thank you for your input!

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To SANDAG:

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SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

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9) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Signed: Angelina Voglia

Signature

Angelina Voglia, Coalition for Safe Trains

Name

[redacted], Del Mar CA 92014

Address

[redacted]

Email

More info at: https://safertrain.org/

SANDAG

San Diego LOSSAN Rail Realignment

Public Comments on Notice of Preparation

COMMENTS

The least invasive, most cost effective 3) ability to sustain time, weather & erosion Stabilize the hill & areas of concern & adding the double track seems to be the best Idea. Anyone wants to endure long construction times excess traffic delays etc

Your job is important & opportunity requires a lot of time & work. Thank you for your efforts

Please fill in the information below. Please print clearly.

NAME Cathy V. Neville PHONE NUMBER [redacted]

EMAIL ADDRESS [redacted] ORGANIZATION

CITY SD ZIP CODE 92075 RECEIVE LOSSAN EMAILS? ☐ YES ☐ NO

Thank you for your input!

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Public Comments on Notice of Preparation

COMMENTS

I WOULD RECOMMEND CONSIDERATION BE MADE TO INVESTIGATE A NEW TUNNEL UNDER THE SEABED OFF SHORE.

Please fill in the information below. Please print clearly.

NAME ROMAN SKEPTUS

PHONE NUMBER [redacted]

EMAIL ADDRESS [redacted]

ORGANIZATION SELF

CITY SOLANA BEACH ZIP CODE 92075

RECEIVE LOSSAN EMAILS? ☐ YES ☒ NO

Thank you for your input!

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Public Comments on Notice of Preparation

COMMENTS

The Railway Re-alignment should make the least impact on existing homes/quality of life. Therefore using existing Right of Ways i.e. I5 & Del Mar Fair/Grounds should be the best option.

Please fill in the information below. Please print clearly.

NAME Karen Staats

PHONE NUMBER [redacted]

EMAIL ADDRESS [redacted]

ORGANIZATION Home owners

CITY Del Mar

ZIP CODE 92014

RECEIVE LOSSAN EMAILS? ☒ YES ☐ NO

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COMMENTS

Thank you for an informative presentation on 5/29/2025

I support your efforts to create a safer more environmentally sensitive train system through Del Mar & Penasquitos Canyon.

I support the special event platform at the DM Fairgrounds to reduce traffic on Via De La Valle & I-5

I support rail & trolley service throughout North Coastal areas

I am supportive of Dual tracks throughout San Diego. and Thank you for your efforts

Please keep the tracks where they are in Solana Beach if possible

Please fill in the information below. Please print clearly.

NAME Clare White-McDonald PHONE NUMBER

EMAIL ADDRESS [redacted] ORGANIZATION

CITY Solana Beach ZIP CODE 92075 RECEIVE LOSSAN EMAILS? ☑ YES ☐ NO

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COMMENTS

Thank you for holding the meeting
I agree the trains is an important
element for traveling I have used it
myself

I think option 3 or 4 (reinforcing the bluffs)
is the most cost effective & imposes
minimal impact to all.

I don't think option 1 is a good alternative
way to costly & impacts the fairgrounds.
Option 2 is also more costly although is
an alternative

My vote would be ~~for~~ for #4 with
#3 as my 2nd choice

Please fill in the information below. Please print clearly.

NAME Laura Wiatski PHONE NUMBER [redacted]

EMAIL ADDRESS [redacted] ORGANIZATION

CITY Solana Beach ZIP CODE 92075 RECEIVE LOSSAN EMAILS? ☑ YES ☐ NO

Thank you for your input!

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I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Signed:

Signature

KARL WILLERT

Name

[redacted], DEL MAR, CA 92014

Address

[redacted]

Email

More info at: https://safertrain.org/

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Signed: Jackie Workman

Jackie Workman

Signature

Name

[redacted] Del Mar, CA 92014

Address

[redacted]

Email

More info at: https://safertrain.org/

Please consider two options for Study

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The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

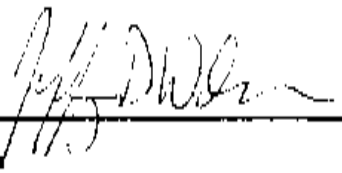
The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3) Has no negative impact on the City of Solana Beach
4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which
6) compensation can be paid without displacing families.
7) Eliminates expensive tunnels under private property and below sea level
8) Assumes the Fairgrounds will have their special events platform as planned
9) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Signed: 

Signature

-Jeffrey D Workman

Name

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Address

[redacted]

Email

More info at: https://safertrain.org/

REGAL
COURT REPORTING

In Re: San Diego LOSSAN Rail Realignment

Scoping Meeting Public Comments

Thursday, May 29, 2025

6:00 p.m.

Transcribed by:

Nancy Thomas, CSR No. 14754

REGAL
COURT REPORTING

Public Scoping Meeting Comments

Thursday, May 29, 2025

6:00 p.m.

MR. RICHARD TORRES: My name is Richard Torres. Last name is spelled T-O-R-R-E-S. My comment is: We should use public right-of-ways for existing rail realignment; i.e., along the 5 corridor and across the fairground property and underground. It would be much easier; although, it might be a little bit more costly.

MR. DEAN MEREDITH: Good evening. My name is Dean Meredith, D-E-A-N, last name Meredith, M-E-R-E-D-I-T-H. I've lived and worked in Del Mar for 40 years. I am asking SANDAG to please add a Northern Yellow Line, NYL, to the routes to be studied in the EIR process as the CEO of SANDAG committed to doing at the February 28, 2025, SANDAG meeting.

This sensible route has been developed by citizens, academics, and businessmen in the local communities to provide the government with the most safe and effective route to achieve SANDAG's goals to move the tracks off the bluff. This route enhances safety and

protects the community's homes and businesses from severe destruction and business failures which will cripple the cities of Del Mar. It includes a modular bridge structure which leaves the land below undisturbed and, essentially, economical. With agreement to lower speed on a curve, this route accomplishes SANDAG's goals and works with the new planned fairground event platform.

The proposed Camino Del Mar, Crest Canyon, and Bluffs route all severely impact -- negatively impact the people and businesses of Del Mar and will destroy the landscape, downtown, businesses, and quality of life for the ten years of construction and forever more. These three routes also have one located portal in the Jimmy Durante area, leaving the city without the designated tsunami escape route.

The current routes that SANDAG has committed to studying do not accomplish their stated goals. If safety is a priority, then put a tunnel -- then putting a tunnel under homes with freight trains, carrying dangerous military equipment, and spewing concentrated diesel fumes from portals into the community,

is dangerous and an environmental disaster. Homes will be taken with eminent domain, others near portals will be subject to exhaust and decreased property values. The tunnels under our homes will cause noise and vibration that exceeds allowable levels for over 2000 homes according to SANDAG's own report. A study -- vibration study done by SANDAG was flawed and it is a known fact.

Double tracking on the Bluff is a bad option as well. Bluffs erode over time. This is not a safe alternative for any train. It is important that SANDAG study the NYL route and choose a route that does not adversely affect the community. The Northern Yellow Line route must be part of SANDAG's EIR process. The proposed Northern Yellow Line that SANDAG CEO says will be studied meets the criteria, supports the fairgrounds and the community in the best way possible. I'm asking that this route be firmly added to the EIR process. Thank you very much, Dean Meredith.

MR. RICHARD MEYERSON: I am Richard Meyerson, M-E-Y-E-R-S-O-N. I would like to know the cost of the "doing nothing" project.

Because I am sure that there are expenses involved in the refurbishing where the tracts are currently that we didn't hear anything about. Thank you.

MR. BENNY LANDMAN: Benny Landman, L-A-N-D-M-A-N. And I have seen in Europe and South America, train -- highways with trains attached to them for the trains. So why can't we use Highway 5? And then have a place for the trains on Highway 5, both going north and south. That's probably the most efficient and rational way of doing it that I can think of.

MS. ANGELINA NEGLIA: Hello. My name is Angelina Neglia, N-E-G-L-I-A. I'm the leader for the Coalition of Safer Trains. We're a grassroots group that represents all the way from Oceanside to Sorrento Valley and our goal is to proactively protect our communities from the infrastructure of these trains, the LOSSAN project.

We've been working closely with SANDAG on the various NOP options. In fact, we made the shortlist in the only non-rail stakeholder in the shortlist of the NOP in July 2024. And why we're here today is to verify -- because in our

meetings with the SANDAG board and Mario Larrazabal that they've committed to study our Northern Yellow Line alternative to the same extent as the rest of the other four alternatives. And they've written that in the legal documents and the minutes that they will study on Northern Yellow Line. The reason being is the four proposed rail alignments are all extremely unsatisfactory for a number of reasons, including: destruction of homes; eminent domain of businesses and homes; and destruction of beaches, coastal bluffs, and canyons in Del Mar and adjacent communities.

The two alignments -- two of the alignments place huge air polluting portals near the coast homes and fairgrounds. And the two alignments regarding the north portal for the Camino Del Mar option and the Crest Canyon option put a portal at the intersection of Jimmy Durante and Camino Del Mar will take 35 to 50 homes for eminent domain and businesses that also seal off the north end of Del Mar for over a decade. We know construction doesn't end on time and things like fire hazard, fire department, first responders, no one will be

able to get into Del Mar. And also business from the fairgrounds, tourism, none of it will come into Del Mar for over a decade. And when -- in all the SANDAG documents, they talk about revenue generator, they only ever refer to the fairgrounds. Well, Del Mar is also a revenue generator and they'll be sealing up business and tourism for over a decade and business in Del Mar areas.

Now, if you have the Camino Del Mar option, same North portal that seals off the north end of Del Mar, the south portal, down at the end of Camino Del Mar -- south end of Del Mar -- also does the same thing. It seals off Del Mar for a decade again. So you've sealed the north and south sections of Del Mar for over a decade. How is a city going to survive?

I've met with city council to find out. if we get no revenue from businesses, how long can you survive? And also 35 to 50 homes will be taken at both ends of the city. That's unconscionable when we've come up with a less impactful alternative. The goal of this project is to eliminate road grade crossings and our option, which we've created, is a

Northern Yellow Line dealt back. Because the realignments that SANDAG's created -- all of them have off-road grade crossings. All of them put tunnels and portals near homes, triple the pollution, they're tripling the trains right next to homes, and also they've infrastructure in the lagoons which, last time I checked, they were trying to be environmentally responsible. They have infrastructure in the lagoons and the north portal is in a floodplain. So is the new bridge. Who puts billions of dollars in infrastructure in a floodplain when we know that we have sea-level rise, runoff, and we have groundwater. So the new bridge across the fairgrounds, under their platform, is going to be double wide in a river at the mouth of the river mouth and that bridge is going to be higher, double wide, and also triple the pollution walked in across the community. And these are unacceptable options, all of them.

The Yellow Line -- the Southern Yellow Line alternative that SANDAG did create, because we try to work with them, it doesn't work. And I've told Mario this because you're

going to be putting a train literally 50 yards in front of people's homes. That's unacceptable. And it'll also have eminent domain. They're also putting portal right next to homes and taking homes to put that portal in. It's not going to be acceptable. It's also at the edge of a lagoon in a native natural reserve.

Under Camino Del Mar will destroy the town. The double bluffing will completely destroy the bluffs. In fact, the SANDAG presentation tonight, showing the video of the cliff failure, should be the very reason why the double track in the bluffs should be eliminated. Even if you double-track, single-track armor, we can't stop the erosion. We can't stop sea level rise, and the vibration of trains on the bluff. And through the entire hillside of Del Mar, the vibration will impact the homes, the people that live in those homes, that are, actually, lucky enough to have their homes left, and also documented medical illnesses of living with high vibration and the noise that comes from the trains, which they're going to be tripling.

When we talk -- when we talk about the Northern Yellow Line we've created, it comes off the Trestle Bridge. It swings around the southern edge of the fairgrounds and I want to make this clear in my comments. Our alignment does not go through the fairgrounds. It doesn't go on the fairgrounds. It doesn't go under the fairgrounds.

The fairgrounds believes everything our group, the Coalition for Safer Trains, we want to destroy the fairgrounds. Completely untrue We go around the fairgrounds and what the fairgrounds has not made public is, there's a 100-foot easement -- public easement that runs around the fairgrounds and they'll be a living levy that will be built on the north side of that river, as well, to stop the erosion of the river.

And we're utilizing coming off that bridge, an elevated rail goes around the southern edge of the fairgrounds. It continues around the edge of the fairgrounds, all the way around the car park east -- in an easterly direction and it's elevated and makes a 2 percent climb over Jimmy Durante and then it

crosses and it goes across the dirt at the Del Mar driving range and heads to the 5, which is the old 2017 SANDAG I-5 alignment that's already been proven.

Our alignment doesn't have -- has no tunnels. It's going to be way cheaper. No portals, no ventilation buildings, no eminent domain, and we don't put any infrastructure in the river or the lagoon. This needs to be surveyed to the same environmental study as the other alignments because it's the way to get the train over to the 5 which should be the real transportation corridor. Thank you.

MR. JOHN FRY: John Fry, F-R-Y. For the Camino Del Mar alternative, please provide information to the public, specifically, those with homes within 500 feet, as follows related to potential impact.

One, noise. Threshold of increased noise related to current condition. If increased, provide examples, both written and audio, that would help the public understand the potential change.

Two, vibration. Threshold of increased ground movement related to current condition.

If increased, provide examples, both written and comparable real-life situations, that would help the public understand the potential change.

(Whereupon, public comments ended.)

CERTIFICATE

OF

CERTIFIED VERBATIM REPORTER

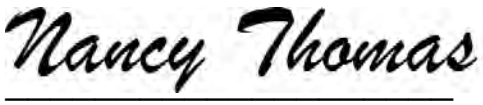
* * * *

The undersigned Certified Verbatim Reporter of the State of California does hereby certify:

That the foregoing meeting was taken before me at the time and place therein set forth.

That the statements made at the time of the meeting were recorded verbatim by me and were thereafter transcribed, and, therefore, said transcript being a true and correct copy of the meeting.

In witness whereof, I have subscribed my name this date: June 6, 2025.



Nancy Thomas

REGAL
COURT REPORTING

In Re: San Diego LOSSAN Rail Realignment

Scoping Meeting Public Comments

Thursday, May 29, 2025

6:00 p.m.

CERTIFIED COPY

Transcribed by:

Katherine Thomas, CSR No. 14378

REGAL COURT REPORTING

Public Scoping Meeting Comments

Thursday, May 29, 2025

6:00 p.m.

MS. HANNAH STERN: Good afternoon, everybody. We're going to begin verbal public comment. If you're interested in providing spoken comments this evening and have not yet submitted a speaker slip, please do so. Speakers will be called to the microphone and podium in the order in which the speaker slips were received.

The amount of time allowed for each verbal comment is determined based on the number of speakers signed up for comment. This allows us to hear from as many people as possible before the meeting ends. Based on the number of speakers signed up, we've determined that each member of the public will be given two minutes for their comment.

If you would prefer to submit written comments, please go to the comment tables in the lobby. Written and spoken comments at tonight's meeting and all comments we receive during the public scoping period will be added to the administrative record.

As a reminder, we are taking your comments as part of the record and not responding to or answering questions. When you're called, please state your name

clearly so that the court reporter can document your comments accurately.

Let's get started. Our first speaker is Chris Prior, if you could come to the mic, please.

Is Chris Prior around?

All right. We'll move on to the next speaker, Maxwell Gergen.

MR. MAXWELL GERGEN: Hello. Hi, my name is Maxwell Gergen. I'm a resident of Downtown San Diego. I was commenting on this as the LOSSAN corridor is very important to me. It is my way to visit friends in LA and Orange County. It is my way to visit friends and travel in North County San Diego, and it's also just a way -- it is next to my apartment, and I care about it deeply.

I was commenting as I am concerned about two alignments in particular as well as the no-build option. So I believe that these tracks need to be off of the Del Mar bluffs, and I think that includes a reinforced Del Mar bluffs option. I don't think that that should be considered, as that would still remain on the Del Mar bluffs and it would still be at risk of erosion some day. So I believe that these tracks need to be moved inland.

Also, I believe that the I-5 alignment is very slow speed. It has a 30-mile-per-hour curve on a right-of-way that the State of California, as well as

SANDAG both said they want 110 miles per hour between San Diego and Oceanside. So I believe that a 30-mile-per-hour curve is just not reasonable on a corridor like this.

So I am also commenting in favor of the Crest Canyon alignment and the Camino Del Mar alignment. Personally, my favorite is the Crest Canyon alignment as it will allow for 110-mile-per-hour speeds and will have very low impacts on Del Mar and especially low impacts on the lagoons around Del Mar. I think that's about it on my comment. Thank you.

MS. SHEILA GARCIA: Next we have Carol Kerridge. Is Carol here? We'll go look in the other room. Is Jonathan Polikoff than here? Jim Dealy? Okay. I'm just -- they're letting them know on the other side. So I'm just going to run through the other names we have here. Is Amy Cheshire here? Karen Lare?

MS. KAREN LARE: Hi. Thank you for taking the comment. Okay. Great. My name is Karen Lare and I'm a Del Mar resident, and I'm also head of the homeowners association. So tonight I'm representing 126 homeowners on the south end of Del Mar at Del Mar Woods. The HOA will be submitting a formal letter to SANDAG as well.

The line that you've -- one of the line options that goes underneath Corona Del Mar has quite an impact

on the HOA. It goes underneath a three-story building that was built in the 1970s, and so it goes directly under three-story condominiums that were not built to have a train underneath them. So talk with your engineers about the potential for the shaking and rattling and rolling that will happen because the earth does conduct the sound and does conduct -- sorry -- also the vibrations.

So we'll be submitting a letter on behalf of the HOA as well to you on that, but I would like to consider the rail assignments that do not impact people's homes, namely a northern yellow route.

So the northern yellow route had been discussed with SANDAG. I'm disappointed that more work was not done on this before you came out with the NOP. It would have been beneficial to all of us because I do know that some work was done by your engineers, if that had been included as one of the options.

It's feasible. It's on public land. It does not take people's homes and, contrary to the gentleman's comment here, a sharper turn where the train has to slow down is not the end of the world. It's a lot better than taking someone's home, and it's a lot better than disrupting an entire community.

So we appreciate it's a difficult task. I think

that the biggest benefit would be if you did a long-range forecast and you really moved these tracks completely out of some of these towns. 110 miles an hour, even 70 miles an hour through a densely populated area is a challenge. So as you're doing this work, I hope that you get a chance to do that as well. Thank you.

MS. CAROL KERRIDGE: I'm Carol Kerridge. Del Mar. I'm concerned about the cumulative impacts of safety, risk throughout the whole Del Mar hillside, and I think they're mounting.

Geological findings of the region show the costal hillside areas are made of more sedimentary, softer rock with the harder, more solid rock at the base. Increasing erosion and several mud slides have already occurred in these sedimentary areas here on our hillside.

A lot of these issues -- several residents have noted sinkholes and flooding on their property occurring during and after heavy rains. Scripps Institute of Oceanography climate scientists predict possible extreme weather threats to our region that include strong atmospheric rivers and intense Santa Ana winds. Del Mar is now found to be a high risk for wildfires.

Should a tunnel be decided on any location on our hillside, how will the seismic vibrations of trains effect the higher sedimentary geological areas of the

hillside? And how far away will the rumble of the trains be felt and heard? Considering the sedimentary geological areas of the hillside, how will it withstand the weight of the proposed train travel of 111 trips for 24 hours?

The Bureau of Transportation Statistics reports each freight train engine weighs 200 to 240 tons. That's -- one ton equals 2,000 pounds. The freight train cars that are empty weigh 25 to 30 tons each. I hate to even mention the FEMA prediction of earthquakes for our region. Has SANDAG taken any consideration of these issues as you study the LOSSAN plain for our region? Thank you for the opportunity to speak.

MS. SHEILA GARCIA: Next we have Dirk Bartsch.

MR. DIRK BARTSCH: Hi. My name is Dirk Bartsch. I'm a resident of Del Mar, and my concern is with the newspaper article that came out about two months ago that said that the federal government is a stakeholder and the federal government has not yet signed off on moving the tracks.

So for the defense department and also for heavy freight traffic, if you cannot move that through the tunnel and this is only a passenger tunnel, then it's really not going to be helpful to move that off the tracks. So I prefer that -- either the current idea to

double track it along the bluff with reinforcement. But to have a tunnel that will only be used by passenger rail, is $4 billion down the rabbit hole. Thank you very much.

MS. SHEILA GARCIA: Thank you. Tony Crans. Shirli Weiss.

MS. SHIRLI WEISS: Good evening. Thank you for the opportunity to speak. My name is Shirli Weiss. I'm a resident of Del Mar. The best route is the route that we've heard the least about today, and that's the northern yellow line that has been proposed by residents in consultation with their engineers. That line is north of the San Dieguito Drive, that has been shown as one of the alternatives. It's one of the routes that SANDAG has committed to study. They should have had it in the NOP.

That route has no negative impact on any homes or business in Del Mar. It preserves the San Dieguito Lagoon and allows restoration of the Los Penasquitos Lagoon. It has no negative impact on the city of Solana Beach. It places no air pollution portals near homes, near the coast, or near the fairgrounds, no tunnels under homes.

It runs entirely along the edge of the state-owned property and minimally impacts the fairgrounds for which compensation can be paid without

displacing families. It eliminates expensive tunnels under private property and below sea level. It assumes the fairgrounds will have their special events platform. It allows the river path Del Mar to be completed as planned. It's the best route.

The only drawback is it's not going to go 110 miles an hour. 110 miles an hour through a densely populated Del Mar is basically asking for a catastrophe. Please study the northern yellow line. It is our only real hope here. Thank you.

MS. SHEILA GARCIA: Jim Dealy.

MR. JIMMY DEALY: Hi. Hi. My name is Jimmy Dealy. And I am in support of the Crest Canyon higher-speed alignment. Of all the routes that could be chosen, if you're spending significant amount of money, you might as well go big or go home. No compromises tunneling [sic]. So go as fast as possible through Del Mar.

Unfortunately, if residents are going to complain, then that's going to be an issue, of course, but as shown previously, the fairgrounds are not interested in working with any project here.

You have to think about what's viable, and, potentially, if a few homes -- specifically with Crest Canyon higher speed, with seven homes being impacted, you

might impact those seven homes, but you can get the trains off the bluffs, which reduces the noise for those living on the bluffs. It allows you to have coastal access for a larger portion of the coast line, and it prevents you from needing a large retaining wall, which would ruin the coastal views and ruin the aesthetics of the area.

Additionally, I'd say this might not be being discussed at this meeting, but please leave space for overhead electric catenary lines for future electrification. Thank you.

MS. SHEILA GARCIA: Leif.

MR. LEIF GENSERT: Hello. I'm Leif Gensert. I'm the vice president of Ride SD, a local education and information, public transit adverse group. Lots of our members take the train often from San Diego to LA, even further all the way to Santa Barbara. I personally take the coastal all the time to go to Solana Beach, Oceanside.

We're very much in favor of a stable connection between San Diego and Los Angeles. We also want the train to be fast, that's why we're leaning towards the Crest Canyon option.

Additionally, we would like to wish some more clarification, information around catenary. We're very

much in favor of leaving room in the tunnel for additional catenary wire, so that we can long-term electrify the surf line and the coastline. Thank you.

MS. SHEILA GARCIA: Thank you. I have some of the names that we called earlier. Chris Prior. I also have Angelina Neglia and Amy Cheshire. So if you're here. Please come on back. Amy?

MS. AMY CHESHIRE: Yeah. Thanks. My name is Amy Cheshire. I'm a resident of Del Mar. We began collaborating after we saw the draft NOP that showed the yellow line running through the San Dieguito Lagoon.

We began collaborating trying to find a solution that would work for everybody, that would please Solana Beach, the fairgrounds, Del Mar, would preserve our beaches, because double tracking the bluff, keeping the tracks on the bluffs is going to destroy the beaches, and you don't want to destroy the lagoons. If you can get the tracks out of the Penasquitos Lagoon, that's a great improvement in San Diego County, and you want to keep it out of the San Dieguito Lagoon.

So in collaborating with my fellow residents, we came up with the northern yellow line, and SANDAG has committed to studying it. And I'm very grateful, but we haven't seen any progress. We'd like to make sure that it gets studied and that we are able to put as much work

into designing a route that will save lagoons and beaches and not take any homes in Solana Beach, in Del Mar, and not take out any businesses.

I have some flyers here, if you'd like to look at them. They have all the details of the northern yellow line, and you can sign it and submit if you have something that you would like to submit tonight. Thank you.

MS. ANGELINA NEGLIA: Hi. I'm Angelina Neglia. I'm the leader of the Coalition for Safer Trains. We've been working with SANDAG for the past few years to work on this project to find a proactive way to not take people's homes and businesses and no eminent domain. And we have created the northern yellow line, which we're starting to hear about.

And we presented this to SANDAG a while ago, and -- after the first NOP where we were the only non-rail stakeholders that made the short list last year. And from that, we worked out the northern yellow line that comes out of the trestle bridge, hugs the southern edge of the fairgrounds.

And everyone should know that the fairgrounds have a 100-foot public easement where the coastal trail would go, which has never been built, and the fairgrounds haven't really made that public, and Del Mar will be

building a living levy around the north edge of that river because of the erosion.

And that -- we're going to come off the event platform around the bridge, and utilizing the easement, we'll have an elevated rail that goes around the exterior of the fairgrounds and doesn't cross Jimmy Durante at the roundabout, because it's very congested there, and it goes across Jimmy Durante, further north, goes across, and we can accommodate 2 percent for a freight train and passenger train, goes across the very southern edge of the driving range, which is dirt -- it's better to take dirt than somebody's home or business -- and it heads to the I-5.

There's no tunnels, no portals, no ventilation buildings, no noise, no vibration for any residents or businesses. And we take infrastructure out of the lagoon, and we hook up to the 2017 SANDAG I-5 alignment.

In my discussions with Mario and the team, they've committed that they will study our northern yellow line to the same extent as the other alignments that have just been presented to you this evening. And it's key that there's no eminent domain, no subservice easement. Then we won't have litigation. This project will be already ten years of construction.

Our biggest concern with the other alignments is

the north portal at the intersection of Jimmy Durante and Camino Del Mar will virtually seal off the north end of Del Mar for over a decade. So there will be no business, no tourism, nothing from the races.

Emergency responders won't get into Del Mar. And we've just been -- I've just met with the fire chief because of the fires in Malibu. Our little, tiny, windy streets -- all of the new evacuation routes all wind down to Camino Del Mar and Jimmy Durante to go north. Well, if that's gone, how do we get out of town? They have no good answer for that.

And then the southern end, if there's going to be the Camino Del Mar southern portal, the issue with the southern portal is it takes homes at the southern end just like the north end, but there's also an underground car park down there and the tunnel is -- and the portal will be right at that southern portal. And, again, it's at Camino del Mar which will greatly restrict access in and out of the southern end of Del Mar.

So when we talk about revenue generators, all I ever see is the fairgrounds as a revenue generator, but Del Mar is as well, and we won't survive if Del Mar is sealed off. Double tracking the bluff is a huge issue for us. We're working with geologists and a lot of comments come to us and say, "Oh, you can just put a

tunnel under Del Mar; what is the problem."

Well, what they don't realize is a lot of the tunnels in the country are in the East Coast or the Midwest and it's granite. The tunnels here would be in soft Torrey Pines sandstone. And people don't realize, like there's Abrams tanks that STRATTEC uses to go on those tracks. They're 32 tons a piece. And the train is longer than Del Mar. That is what's going to be vibrating through whatever the rail alignment that's chosen and the tunnel. We can't let it happen. Thank you.

MS. SHEILA GARCIA: Last call for Jim, Jonathan, or Chris or anybody else that would like to give public comment.

MR. JONATHAN POLIKOFF: Yeah. So this is being recorded, right? Okay. I'm Jonathan Polikoff. I live in the city of Del Mar. And I think -- there were a lot of priorities that were put on the board. I know when I read the document, it seemed to be important that the trains travel at high speed. I think the prime directive should be preserving the city of Del Mar. You know, this is an existential crisis for our city.

I agree with a lot of the comments that the previous speaker made. I guess I'll just be repeating some of them. You know, we can't let our business

community go bankrupt. It's -- that's just not an option. We need to preserve egress and inflow to our city for safety reasons. What happened in Pacific Palisades is a good example of what happens when you don't have easy access out. And we need to -- we cannot take homes by eminent domain. I mean, a home is -- a home in Del Mar is basically, you know, it's, like, part of your family, you know.

You cannot allow eminent domain or negative environmental impacts to homes in Del Mar. So, you know, of the alternatives placed up there, the yellow route seems to be the least bad, but I implore you to seriously study the more northerly route that won't impact homes that was mention previously. Thank you.

MS. SHEILA GARCIA: Before we close the public comment, is there anybody else that would like to speak? Okay.

MR. RUDD KHUTZEN: I'm Rudd Khutzen from Solana Beach and after listening to the presentation this evening, the one thing I didn't hear was the cost of doing nothing, other than maintaining the tracks as they are.

I heard the cost estimates for three or four of the alignments but nothing about maintaining it as is. So it would be nice to see what that cost estimate might

be over the next period of time, 10, 20, 30 years, whatever it may be.

But I have to say, after listening to all the other people here tonight, that northern route, the northern yellow route sounds the most common sense, and it sounds like it might be the most cost-effective as well. So I would just hope that the SANDAG people and board of directors would take a look at that more closely. Thank you.

(Whereupon, public comments ended.)

CERTIFICATE

OF

CERTIFIED SHORTHAND REPORTER

* * * *

The undersigned Certified Shorthand Reporter of the State of California does hereby certify:

That the foregoing meeting was taken before me at the time and place therein set forth.

That the statements made at the time of the meeting were recorded stenographically by me and were thereafter transcribed, and, therefore, said transcript being a true and correct copy of the meeting thereof.

In witness whereof, I have subscribed my name, this date: June 5, 2025.

Katherine Thomas

Katherine Thomas

Comments Submitted in Response to the NOP

Emails

Attachments: 0621193845b525e205699861a98cd571d7aefcc4.png

From: Fortunate Son [redacted]
Sent: Monday, June 16, 2025 9:26:27 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Kieth Greer <kieth.greer@sandag.org>; Danny Veeh <Danny.Veeh@sandag.org>
Subject: Del Mar Bluff Double Track Concept, Alternative 4

To: LOSSANcorridor@sandag.org
From: Dirk Ackema [redacted]
Date: June 16, 2025

Attn: Del Mar Railway Resilancy

Thank you for the opportunity to provide feedback on the Del Mar Rail Realignment project. I attended the May 29 public meeting and have reviewed the updated alternatives being considered. I am writing to express my strong support for a refined version of **Alternative 4**, which preserves the existing coastal rail alignment along the Del Mar bluffs while incorporating critical engineering and environmental enhancements.

In my view, Alternative 4 remains the most sensible and cost-effective approach to maintaining rail service through Del Mar. It respects the corridor's strategic importance and offers realistic opportunities for reinforcing the bluffs without the extensive disruption and high costs associated with tunneling.

I respectfully offer the following observations:

- **Coastal Reinforcement:** An engineered retaining structure at the base of the bluffs is both feasible and advisable. The presence of dense clay near the bluff base presents a sound footing for such a wall, which could be stabilized further using soldier piles

or horizontal anchors into the bluff face.

- **Natural Buffers:** Integrating a living shoreline—combining riprap buried beneath sand, coastal dune formations, and native plants—could soften wave impacts and provide ecological and recreational value. Incorporating drainage through the wall (e.g., weep holes) would allow moisture to support plant growth and relieve hydrostatic pressure.
- **Sand Management:** Coordinating the bluff project with a long-term sand replenishment program would significantly bolster resilience. Additionally, installing a modest jetty near the Peñasquitos Lagoon could help trap sand before it drifts into the La Jolla Submarine Canyon.
- **Public Access and Safety:** This corridor could include upgrades that allow for both a Coastal Rail Trail segment and safer crossings. In particular, trenching the track under Coast Boulevard near Powerhouse Park would address a longstanding hazard to pedestrians and vehicles while mitigating train noise.
- **Structural Precedent:** Carlsbad has already demonstrated success with a similar shoreline infrastructure project to protect Carlsbad Boulevard from Pine Street to Tamarack Avenue . Del Mar could do the same with thoughtful design and integration.

Finally, I want to emphasize the broader significance of this corridor—not just for regional passenger service, but also for freight, emergency response, and national security.

Thank you again for your engagement and transparency on this issue. I encourage SANDAG to retain Alternative

4 as a central part of its long-range strategy.

Sincerely,
Dirk Ackema
Email: [redacted]

Outlook

Comment from A Sea Village Resident/Owner

From [redacted]
Date Tue 7/1/2025 12:36 PM
To LOSSAN Comments <lossancomments@sandag.org>

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Lou Adamo
Former Member of Transportation Committee, Torrey Pines Planning Board

From: Jonnell Agnew [redacted]
Sent: Wednesday, June 25, 2025 3:50:04 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: No tunnel under Camino Del Mar

I strongly urge you to move the train to the fair grounds and off to the 5 freeway

If u tunnel under Camino Del Mar and decide to put in an electric train thus widening the tunnel , there will be no businesses left on Camino Del Mar. And electric wires will block our views. The home owners will never allow eminent domain to take our homes since there are other viable routes to move the train.

We are a small community and you will destroy our community. We will not stop fighting to save our homes and community.

The only opinions you should consider in making your decision is from homeowners. Renters or people who ride your train do not have a say for what happens to our homes and community. They don't have a right to influence sandag because they don't live here. And renters can move away from the devastation sandag will create for homeowners if you tunnel.

Tunnel will create toxic fumes and cause illness. You don't need lawsuits to deal with. So it is best you move the train to the I-5 corridor

You have had over 25 years to do this. You have known for over 25 years you needed to move the train. You should not put your passengers in danger by insisting to continue shoring up our cliffs that to this day are still collapsing onto the beach despite your sea walls which are not stopping corrosion of our cliffs

Sincerely,

Jonnell Agnew-Sanford, property owner
[redacted]
Del Mar CA 91024
[redacted]

Outlook

SDLRR Project NOP

From bri bri [redacted]
Date Mon 6/30/2025 12:49 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act

and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

- Briana Agundez

From: Bilyana Aleksic [redacted]
Sent: Friday, July 11, 2025 7:58:17 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Bilyana Aleksic [redacted];
Robin Dykes [redacted]
Subject: Train Realignment

Dear LOSSAN Planning Team,

I'm writing as a long-time resident of the Sea Point community. For the past 16 years, I've had the privilege of walking daily through the Torrey Pines parks and beaches—an extraordinary natural area whose preservation is invaluable not only to our community, but to future generations.

I'm deeply concerned about the potential environmental impact of the proposed Pink and Green Line realignment routes. These options threaten sensitive habitats and have not garnered support from local residents. In contrast, the I-5 Knoll location for the southern portal has strong backing from both environmental advocates and our community as a balanced solution that aligns with ecological and logistical priorities.

Given the lack of public support and the potential environmental costs, I urge you to remove the Pink and Green Line routes from further consideration. Continuing to evaluate these environmentally damaging alternatives would risk taxpayer resources and compromise public trust.

Thank you for your commitment to sustainable transportation planning, and for considering our community's perspective.

Sincerely,
Mickey and Bilyana Alekic
Resident, Sea Point Community

Outlook

SDLRR Project NOP

From Caitlin Allen [redacted]
Date Thu 6/26/2025 8:27 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

From: Rachel Alvarez [redacted]
Sent: Wednesday, June 25, 2025 4:49:17 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP - oppose reinforcing train on bluffs

Hi SANDAG - I strongly oppose reinforcing the train on the bluffs and permanently stroying Del Mar's beaches. The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year.

Best, Rachel

--
Rachel Alvarez
[redacted]

From: Tyler Andre [redacted]
Sent: Saturday, June 28, 2025 7:08:18 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Tunnel Under Camino Del Mar

As a local resident who cares deeply about both our environment and community impact, I strongly support the option that tunnels under Camino Del Mar. It strikes the best balance by being the least expensive of the viable alternatives (aside from keeping the tracks where they are), while also offering a phased construction approach that would reduce service disruptions and make funding more manageable. Most importantly, it avoids major property impacts and keeps environmental safety a top priority. Let's move forward with a solution that respects both people and the planet.

Thank you,
Tyler Andre

From: calimommaof2
To: LOSSAN Comments
Subject: SDLRR Project NOP
Date: Wednesday, June 25, 2025 10:37:47 AM

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

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issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Sent from my iPhone

From: [redacted]
Sent: Thursday, June 26, 2025 3:07:47 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Outlook

SDLRR Project NOP

From Andrea Anthony [redacted]
Date Fri 6/27/2025 9:24 AM
To LOSSAN Comments <lossancomments@sandag.org>

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Thank you for the opportunity to comment.
Andrea Anthony
Oceanside, CA

From: danarello [redacted]
Sent: Friday, June 27, 2025 10:45:05 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Proposed train tracks realignment

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."
Dan Anthony

Outlook

SDLRR Project NOP

From Elisa Allen Arias [redacted]
Date Wed 6/25/2025 2:06 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

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Thank you for the opportunity to comment,

Elisa Allen Arias

Outlook

SDLRR Project NOP

From junko asano [redacted]
Date Wed 6/25/2025 10:45 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Junko Asano

Outlook

Del Mar train tunnel proposals

From [redacted]
Date Fri 6/27/2025 5:24 PM
To LOSSAN Comments <lossancomments@sandag.org>

There are significant issues with the proposed Pink Line and Green Line routes. These routes are environmentally damaging - they would require significant disruption to the lagoon wildlife during and after construction. They also lack community support - they would radically alter the neighborhood and negatively affect property values.

The I-5 Knoll location for the southern portal, in contrast, is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, I strongly urge you to remove the Pink and Green Line routes from further consideration.

Sincerely,
—
Shawn Baker
[redacted], Del Mar 92014

From: danny barger [redacted]
Sent: Thursday, June 26, 2025 4:57:46 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

From: Mike Barnett [redacted]
Sent: Saturday, June 28, 2025 11:09:44 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

As a resident of the San Diego coastline, I urge you to not pursue the Del Mar Double Track Reinforced Alternative. Hardening the shorelines only speeds up the erosion in the vicinity. I have recently read _Against the Tide: The Battle for America's Beaches_ and wish all governmental organizations would realize how destructive it is to try and stabilize beaches by the various technologies.

Thanks,

Mike Barnett
[redacted]
San Diego, CA 92107

Attachments: Community Letter to SANDAG Ken Barrett 5-28-25.docx

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From: Ken Barrett [redacted]
Sent: Thursday, May 29, 2025 4:25:25 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>; hershellprice@knowledgeforthevote.org <hershellprice@knowledgeforthevote.org>; Terry Gaasterland <tgaasterland@delmar.ca.us>; Tracy Martinez [redacted]; [redacted]
Subject: SANDAG LOSSAN rail realignment through Del Mar

Dear SANDAG officials.

I am unable to come to the City Council scoping meeting to discuss the rail realignment options. Please accept the attached letter as my sincere opinion for a better realignment route than the four being considered, with the least impact to both the environment and the Del Mar / Solana Beach community.

Respectfully yours,

Ken Barrett
[redacted], Del Mar, CA 92014

To SANDAG:

My name is Ken Barrett and I live at [redacted] in Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3) Has no negative impact on the City of Solana Beach
4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6) Eliminates expensive tunnels under private property and below sea level
7) Assumes the Fairgrounds will have their special events platform as planned
8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Sincerely yours,

Ken Barrett

From: Katelyn Barry [redacted]
Sent: Thursday, June 26, 2025 4:18:56 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

Sincerely,
Katelyn Barry

From: Candy Barton [redacted]
Sent: Tuesday, July 1, 2025 3:40:55 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Please reconsider an alternative route.....

To Who It May Concern!

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you

Outlook

SDLRR Project NOP

From Bruce Baxley [redacted]
Date Wed 6/25/2025 10:05 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

An alternative for relocating the tracks east through the current Fairgrounds area and then traversing over the hill somewhere east of Del Mar Heights to then connect with the tracks in Carmel Valley should be considered as an alternative to tunneling under Del Mar.

Thank you for considering my comment.

From: [redacted]
Sent: Thursday, May 29, 2025 4:39:13 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: lossanalignment@cosb.org <lossanalignment@cosb.org>
Subject: NO LOSSAN track realignment

Dear Board Members:

I am still opposed to any and all realignment proposals.

The LOSSAN rail lines should be abandoned. Rail transportation of passengers and freight should transition to paved roads or to overhead tracks that follow existing freeways.

Sue Beckman
San Diego resident since 1963; property owner since 1971; current owner of multiple coastal properties in Del Mar, Solana Beach, and City of San Diego

From: Erin Belleville
To: LOSSAN Comments
Subject: SDLRR Project NOP
Date: Wednesday, June 25, 2025 2:36:12 PM

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new

development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

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Thank you for the opportunity to comment.
Erin Belleville

From: Jim Benedict [redacted]
Sent: Tuesday, June 24, 2025 8:07 AM
To: LOSSANcorridor <lossancorridor@sandag.org>
Subject: Del Mar area tunnel options

Hello,

I support the northern Yellow line option.

I oppose the right of the federal government to allow the transportation of munitions under the Del Mar community. Two options allow thi.

NO Bombs under Del Mar.

thanks,

Jim Benedict
Del Mar

Outlook

SDLRR Project NOP

From Connor Bennett [redacted]
Date Mon 6/30/2025 9:37 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

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Thank you for the opportunity to comment.

From: Cheryle Besemer [redacted]
Sent: Thursday, June 26, 2025 7:04:39 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

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area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

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Thank you for the opportunity to comment.

From: Cheryle Besemer [redacted]
Sent: Thursday, June 26, 2025 7:04:54 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

From: Cheryle Besemer [redacted]
Sent: Thursday, June 26, 2025 7:05:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

From: Jazmin Blais [redacted]
Sent: Saturday, May 17, 2025 10:51:13 AM (UTC-08:00) Pacific Time (US & Canada)
To: LOSSANcorridor
Subject: LOSSAN corridor realignment comment

I'd like to submit my comments on the LOSSAN rail realignment project in the Del Mar Corridor.

I believe the only viable option is the proposed yellow line alternative for the following reasons:

1.) It avoids uprooting residential neighborhoods and long time residents who may not be able to afford repurchasing in Del Mar,

2.) it avoids the closure of the 101 which would strangle local, small businesses

3.) it would provide a conduit for people coming to the Del Mar Fairgrounds and relieve traffic congestion along the 5, the 101 and local surface streets.

I resoundly reject the other possible rail alignments proposed. They are unhealthy for Olde Del Mar, its bluff, its people and its businesses.

Thank you,
Jazmin Blais

Sent from my iPhone

From: Ron Blake [redacted]
Sent: Monday, June 30, 2025 4:00:41 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Pink and Geen Line Routes

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.

Ron Blake
[redacted]
Del Mar, CA 92014

From: Susan Blake [redacted]
Sent: Monday, June 30, 2025 10:55:51 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SANDAG Train Realignment Project

To Whom it may concern:

As a new owner at Sea Point Townhomes, I have a vested interest in the decision regarding the realignment of the train route. There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,

Susan Blake

From: Yvonne Blankenship [redacted]
Sent: Friday, June 27, 2025 7:58:43 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Sandag High-Speed Train Project

PLEASE REMOVE the Pink and Green Line routes from consideration!!!

I could not agree with this statement more:
There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and completely lacking community support.

Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents.

Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. *Therefore, I strongly urge you to remove the Pink and Green Line routes from further consideration.*

Thank you.

--
Yvonne Blankenship
Del Mar Resident

From: Danielle Bliemeister [redacted]
Sent: Friday, June 27, 2025 7:15:49 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because

trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

From: Kavin Bloomer [redacted]
Sent: Saturday, June 21, 2025 7:13:12 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Kavin Bloomer [redacted]
Subject: Study the Northern Yellow Line

To Whom It May Concern:

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region.

The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

It appears that the Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment remains in your consideration.

Thank you for your kind consideration.

Respectively yours,

Kavin Bloomer
[redacted]
Del Mar, CA 92014

From: Terrie Boley [redacted]
Sent: Monday, June 30, 2025 10:49:13 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: LOSSAN Northern Yellow Line

As a resident of Del Mar directly impacted by this project, PLEASE strongly consider the proposed Northern Yellow Line alternative.
It is the only one that actually improves our lives instead of endangering them further.

Thank you,

Teresa Boley and Joe Markee
[redacted]
Del Mar, CA 92014

From: Lisa Bono [redacted]
Sent: Thursday, June 26, 2025 8:51:52 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment,

Lisa Bono

Outlook

SDLRR Project NOP

From Scott Boyd [redacted]
Date Fri 6/27/2025 10:54 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

From: Kelly Brannigan [redacted]
Sent: Thursday, June 26, 2025 6:29:32 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Kelly Brannigan

From: Kelly Brannigan [redacted]
Sent: Thursday, June 26, 2025 6:30:21 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Kelly Brannigan

From: jacqueline bridge [redacted]
Sent: Monday, June 30, 2025 10:09:55 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: In support of the Yellow Line

I am a resident of Del Mar and for the reasons stated below I am in support of the Yellow Line:

No Eminent Domain or Homes or Businesses
No Portals or Tunnels under Del Mar
Utilize Public Property
Provides the Fairgrounds their Free Event Platform
Moves the Rail over to the I-5 Transportation Corridor
No Pollution or Toxic Chemicals spewed into our Community
No Bored Tunnels under the Entire length of Del Mar
No Freight Trains under Del Mar
No Military Trains under Del Mar
No Noise and Vibration next to our homes
No Bored Tunnels in the fragile Torrey Sandstone under the full length of Del Mar

Jacqueline Bridge

Outlook

SDLRR Project NOP

From Jocelyn Brossia [redacted]
Date Wed 6/25/2025 10:18 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs

Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

———

Best regards,
Jocelyn Brossia

Outlook

SDLRR Project NOP

From David Bruner [redacted]
Date Wed 6/25/2025 2:33 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

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Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

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Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

From: J.P. Bruner [redacted]
Sent: Friday, June 27, 2025 9:09:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

JP Bruner

From: [redacted]
Sent: Monday, June 30, 2025 8:45:07 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Railroad realign

Please don't use the pink or green line designations of railroad running thru the Penasquitos Lagoon. No local support and VERY environmentally damaging.

TK Bryson [redacted]

From: James Buchanan [redacted]
Sent: Tuesday, June 17, 2025 9:29:01 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: LOSSAN Rail Realignment

I'm not sure if I have previously sent a comment. If I have, sorry for the duplicate message. It appears to me that the Camino del Mar option is the most logical, most affordable, shortest and if implemented properly, the least disruptive to the community and people living in this area. All other options are complicated, expensive, and not particularly viable.

Jim Buchanan

[redacted]

[redacted]

From: Michelle Buchanan [redacted]
Sent: Wednesday, May 21, 2025 2:24 PM
To: LOSSANcorridor <lossancorridor@sandag.org>
Subject: Rail realignment, impact of option San Dieguito Bridge to I-5 Alternative Alignment

Hello,

I would like to state my firm opposition to the San Dieguito Bridge to I-5 Alternative Alignment.

This alignment would be the most environmentally detrimental option of those proposed. It traces a path along the San Dieguito lagoon from the Del Mar Public Works area to the north end of crest canyon, an area which is crucial to many migrating shorebirds, as well as resident species several of which are endangered, including the South western willow flycatcher and the California least tern. Due to human encroachment, there are few of these crucial wetlands available to these birds, many of whom have been flying for thousands of miles, and who need a place to rest and refuel. Disrupting migratory paths can lead to extinctions of many species that eventually run out of options for refueling along their long and arduous paths. Furthermore, this is an area that is widely enjoyed by outdoor enthusiasts of all stripes, due in large part to its healthy ecosystem and diverse flora and fauna.

The degree of ecological threat this alignment poses should be enough to discount this option, but in addition to the devastating effects it would have on wildlife, it also is the longest path and would certainly have the greatest carbon footprint, both to build and to operate.

Please remove the San Dieguito Bridge to I-5 Alternative Alignment from the list of possible realignments.

Thank you,
Michelle

From: Mary Buehler [redacted]
Sent: Thursday, May 29, 2025 2:01:12 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Please consider Additional northern yellow line

Please consider an alternative to the four plans under consideration. Please consider the more northern yellow line that is a possibility and deserves serious analysis since it does not impact any houses or business. Thank you. Donald Buehler and Mary Ellen buehler. And Robert van Hollebeke. And Rachel van Hollebeke.

From: Mary Buehler [redacted]
Sent: Saturday, June 14, 2025 2:25:28 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Please select the Northern Yellow Line option

As SANDAG is moving forward with the LOSSAN Rail Realignment Project, we are now at a critical junction in this process. The main concern is that the Camino Del Mar and Crest Canyon High Speed alignments route the train, carrying hazardous materials, into and through residential neighborhoods. If SANDAG is truly representing the people in their communities, they will select the SAFEST ROUTE for the freight train to travel through our region.

Moving the tracks to a tunnel under homes only trades one dangerous train track for another. If this tunnel is built, BNSF Railroad will be carrying hazardous materials and toxic chemicals directly under Del Mar and San Diego residential neighborhoods, including homes, businesses, infrastructure and public recreational spaces. There is a safer alternative.

The Northern Yellow Line to the I-5 is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, we are requesting that the portals are located away from homes and that the tracks are routed via the Northern Yellow Line east to the I-5.

Thank you , We have lived in our house since1978.
Please do not destroy our neighborhoods

Donald Buehler, Mary Ellen Buehler,

Robert Van Hollebeke, Rachel Buehler Van Hollebeke
Walter Dembitsky, Rebecca Dembitsky

From: Jana Bush [redacted]
Sent: Monday, June 30, 2025 8:27:31 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Remove the Pink and Green Line Routes from consideration

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Sea Point Owner and Resident since 1993

From: Drew Cady [redacted]
Sent: Saturday, June 28, 2025 4:30:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Public Comment regarding latest rail realignment Notice of Preparation

Dear SANDAG:

I want to express my great concern for this new proposal to keep the rail line on the Del Mar bluff, instead of considering other options.

I have lived along this bluff for the past thirty years now, and I frequently walk both the bluff trail (though it is a disastrous construction site presently) as well as along the beach below the bluff. I have witnessed a myriad of large bluff failures over these years, and particularly in this last decade. I know that the 'experts' say that erosion is approximately 6"/year, though there is substantial evidence that certain weaker areas, where erosion is much more evident, are bound to fail in the very near future. SANDAG tells us that they are intending to structurally strengthen the bluff where these erosion points are closest to the track, yet I am quite certain that no amount of concrete and steel can possibly stop this bluff from failing and wreaking havoc upon the present rail line in the near future. A derailment of one of the regular freight trains that run along this line would be much more than the loss of a train down the bluff. It could certainly carry many persons to their death as well, and the potential for a toxic waste spill of enormous proportion could result in turning Del Mar into a Superfund Toxic waste cleanup that might permanently destroy the natural habitat of this bluff, and the destruction of Del Mar's economy. To double track along the bluff is NOT AN OPTION~!!

Please consider that any rail line, to survive the next 100 years will need to be placed in a location where there is not already residential development. To tunnel beneath the downtown of Del Mar is equally as reckless as double-tracking the bluff. This alternative would likely disrupt life in Del Mar for a decade, particularly if the trench is dug from the surface, which would surely devastate the economy of Del Mar village, as would eminent domain for so many residents of the town.

The Yellow line must be considered, given that it would have the least impact upon the surrounding neighborhoods. Yes, it will be costly, but no other alternative is currently on the proposed options, which would not severly impact life for those of us who live in the immediate area of this failing bluff. Frankly, I feel that politics is a deep and harmful

distraction in this discussion. The fact that Solana Beach and the Fairgrounds have been able to simply remove the original suggestion of starting the trench in the present rail line running out of Solana Beach shows this bias clearly. Without any explanation other than one of the council members of Solana Beach mistating what would be at stake for SB, that option simply disappeared.

Do the right thing SANDAG, and find a way to re-locate the tracks without massively disrupting life for so many people.

Sincerely,

Drew Cady
[redacted]
Del Mar

From: Bill Carpenter [redacted]
Sent: Friday, May 16, 2025 3:28:20 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Disappointed that option five, "no build" ditched

I think option four, double tracking on the bluff, will be carefully compared to option five, "no build". I can't imagine that the benefits of double tracking are worth $2 billion!?

Bill Carpenter
[redacted]

From: Malina Cate [redacted]
Sent: Wednesday, June 25, 2025 4:54:18 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because

trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

From: Malina Cate [redacted]
Sent: Wednesday, June 25, 2025 4:54:25 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG, This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

From: Malina Cate [redacted]
Sent: Wednesday, June 25, 2025 4:54:27 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

From: Eve Catran [redacted]
Sent: Monday, June 30, 2025 9:43:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: For your urgent consideration

To whom it may concern:

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.

Eve Catran

Outlook

Train routes through Del Mar

From GEORGIA G CHANGARIS [redacted]
Date Mon 6/30/2025 3:10 PM
To LOSSAN Comments <lossancomments@sandag.org>

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.
Georgia Changaris
[redacted], Del Mar

From: rrobster [redacted]
Sent: Friday, June 27, 2025 10:20:00 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Potential Train Realignment-Del Mar

To all concerned parties,

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

A route that's parallel to the I-5 would be far less environmentally damaging and far less impactful to owners and residents of Del Mar Terrace. This I-5 plan would come with potentially lower capital costs if the plan is executed properly. I, as well as many of my neighbors, feel that it is geologically irresponsible to attempt to tunnel under vast swaths of Del Mar as well as morally reprehensible to execute potential eminent domain actions on these same residents.

Thank you,

Rob Chanock
Sea Village Townhomes

From: rrobster [redacted]
Sent: Friday, June 27, 2025 10:24:49 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Fw: Potential Train Realignment-Del Mar

To all concerned parties,

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

A route that's parallel to the I-5 would be far less environmentally damaging and far less impactful to owners and residents of Del Mar Terrace. This I-5 plan would come with potentially lower capital costs if the plan is executed properly. I, as well as many of my neighbors, feel that it is geologically irresponsible to attempt to tunnel under vast swaths of Del Mar as well as morally reprehensible to execute potential eminent domain actions on these same residents.

Thank you,

Rob Chanock
Sea Village Townhomes

Outlook

ATTN SANDBAG MEMBERS - LETTER ATTACHED

From Katarina C [redacted]
Date Thu 6/26/2025 7:18 AM
To LOSSAN Comments <lossancomments@sandag.org>; Clerk of the Board <clerkoftheboard@sandag.org>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; assemblymember.boerner@assembly.ca.gov <assemblymember.boerner@assembly.ca.gov>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; gaasterland@gmail.com <gaasterland@gmail.com>

1 attachment (63 KB)
SANDBAG Board of Members_Katarina Cheley.pdf;

Dear Board Members of SANDBAG,

Please see my letter attached to my proposal. As a resident of the Del Mar community I am against this action that will greatly affect our community. In addition to all the hazards that will occur during the construction phase, for the lifetime of the tunnel, residents will be constantly exposed to toxic diesel fumes blown out from the tunnel to the neighborhoods by the giant fans that are part of the proposed plans.

Please take this in consideration as we want our great community in Del Mar to stay intact.

Katarina Cheley
[redacted] Ocean View Ave
Del Mar 92014

Attn: Clerk of the Board

SANDAG

401 B Street, Suite 800

San Diego, CA 92101

June 23, 2025

Dear Honorable Members of the Board of SANDAG,

The Board's attention to the future of regional transportation is deeply appreciated.

After reviewing the current report and options, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment. The following points explain why this is the best option available.

With climate change, resilience over 100 years means avoiding sea-level threats—only the I-5 option provides that.

No modern planner would choose to bisect a sensitive area like the Los Penasquitos Lagoon.

The I-5 option also minimizes eminent domain and harm to Del Mar neighborhoods and businesses.

The western options all necessitate destructive new construction within protected habitat.

While no alignment is perfect, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, and least disruptive solution. Please act decisively to preserve our ecosystems, protect communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

Katarina Cheley

[redacted] Ocean View Ave

Del Mar, CA 92014

From: Peter Chen [redacted]
Sent: Monday, June 30, 2025 11:25:26 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: High speed train - comments from resident

Dear SANDAG,

There are significant issues with the possible Pink Line and Green Line high speed train routes. These routes are environmentally damaging and lack community support.

In contrast, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. I ask that you serve the best interests of the residents in the community and remove the Pink and Green Line routes from further consideration. Thank you.

Peter Chen
Del Mar resident
[redacted]

From: tony childs [redacted]
Sent: Wednesday, May 28, 2025 11:48:09 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Track realignment

We do not see why **LEAVING THE TRACKS** in place was added to the list of possible solutions. The entire idea was to get the tracks off the crumbling cliffs. Reinforcing them now will only result in a solid concrete wall replacing the bluff to the West of the tracks over time.

This is insane....you cannot stop Mother Nature....this is simply passing the problem to someone else down the line.

Resist the temptation to NOT make a hard choice.

Tony and Susan Childs

Attachments: LetterToSANDAG062525.docx

From: [redacted]
Sent: Wednesday, June 25, 2025 11:39:43 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Del Mar Tunnel Options

George L. Chilson
[redacted]
San Diego CA 92103-3294
[redacted] **(land) -** [redacted] **(mobile)**

June 25, 2025

Hon. Lesa Heebner, Chair
SANDAG
401 B Street, Suite 800
San Diego, CA 9210
To: lossancomments@sandag.org

Subject: Del Mar Tunnel Options

Dear Chair Heebner and Board Members:

I have lived in San Diego for 25 years and depend on the Pacific Surfliner service. I use it whenever I travel north to Los Angeles and beyond. It allows me to escape the growing misery and stress of driving on I-5. The train is important to my "quality of life." That's why the service suspensions and "bus bridges" over the last several years have been unfortunate. I am grateful to SANDAG for what it is doing to prevent coastal erosion from permanently severing San Diego's rail connection to the rest of America.

After reviewing the *Final Value Analysis Study Report* issued in February 2025,
I urge SANDAG to adopt Alternative C, which will relocate the rail line inland, away from the crumbling Del Mar bluffs, into a tunnel under Camino Del Mar.

This alignment best meets the seven key objectives articulated for this project.

1. **Ensures continued operation** of the railroad into the foreseeable future by moving the line inland – ironically close to its original alignment. This is the single most important objective of, and the catalyst for, this entire project.
2. **Maintains service to the existing stations** in Solana Beach and Sorrento Valley, thus preserving the utility of previous investments; also accommodates future – and likely low cost – access to the Del Mar Fairgrounds.
3. **Minimizes the negative impacts** to existing homes and businesses by placing the tunnel under a wide commercial street; also provides significant positive impacts – not mentioned in the report – that relocating trains away from a densely populated residential area will increase pedestrian safety and improve beach access.
4. **Enhances wetlands** by replacing the current bridge over the Los Penasquitos Lagoon with a new one that facilities better water flow.
5. **Meets state and regional plan goals**. Double tracking the entire route enables greater frequency and improves reliability; design for continuous 110 mph operation reduces trip times.

6. **Improves coastal access and safety** by permanently removing trains from adjacent trails frequented by hikers.
7. **Demonstrates good public stewardship**. Alternative C is the lowest cost alignment for moving the tracks inland. It maximizes use of existing rail infrastructure assets. It likely will reduce maintenance costs.

Please plan for future generations. Clearance specifications for this project should not only accommodate the tall auto-rack cars that serve the Port of San Diego today but also provide the additional headroom needed for an Overhead Contact System (OCS) that will allow electrification – the international gold standard for high-frequency passenger train service – tomorrow.

I urge SANDAG to remove three alternatives that do not meet these objectives from further consideration.

1. San Dieguito Bridge to I-5: Longest and most costly; causes significant damage to the Del Mar Fairgrounds and the San Dieguito Lagoon; introduces a low-speed reverse curve that would increase trip times and complicate freight train operation.
2. Del Mar Bluffs Double Track Reinforced (existing ROW): Does not eliminate the probability that coastal erosion will eventually and permanently sever the rail line. Double tracking of this alignment is likely to generate even more local opposition than other options.
3. No Build: A straw man option that virtually guarantees coastal erosion will permanently sever the rail line in the not too distance future.

Finally, I encourage SANDAG not to give great weight to the fears some have expressed about pollution, vibration, noise and hazardous material transport. Competent engineering mitigates these risks. People worldwide, including America, live and work above active rail tunnels without problems or concerns. This reality raises the possibility that the fears expressed by Del Mar denizens are not rationally fact-based but emotional hysteria resulting from fear mongering by project opponents.

Del Mar is not an island. It is a fully integrated component of a large urban area from which its residents receive significant social and economic benefits. The notion that Del Mar residents can receive all of these benefits while being forever shielded from any of their costs is unreasonable. I encourage SANDAG to design this project considering the benefits it will provide for the 3.3 million residents of San Diego County, rather than focusing solely on the self-interest of the 3,835 people privileged to live in Del Mar.

Respectfully yours,

George L. Chilson

From: Julia Chunn-Heer [redacted]
Sent: Wednesday, June 25, 2025 7:11:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). Now is the time to act, not go backwards!

The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources.

Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas and potentially allowing double tracking.

I have seen first hand how seawalls destroy beaches. We cannot let that happen here when there are better viable alternatives, which are also advantageous for the train system.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Julia Chunn-Heer
Resident of Encinitas

From: Scott Clarke [redacted]
Sent: Monday, June 30, 2025 9:46:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Concern about Train Realignment

I am concerned about the proposed Pink Line and Green Line routes. They are environmentally damaging and lack community support. Spending more money to analyze the Pink Line and Green Line is a misuse of taxpayer funds.

I therefore strongly urge you to remove the Pink and Green Lines from further consideration and focus on the I-5 Knoll location for the southern portal.

Sincerely,
Scott Clarke

From: GOLDIE CLAUS [redacted]
Sent: Saturday, June 21, 2025 5:32:47 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Northern yellow line alignment

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.

Goldie and John Claus

[redacted]

Del Mar 92014

Sent from my iPhone

From: [redacted]
Sent: Tuesday, June 10, 2025 9:29:02 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Comments to Updated LOSSAN Notice of Preparation

I'm pleased to see the latest set of alternatives in the Updated NOP. The best alternative of those still under consideration to moving the rails from the cliffs of Del Mar is the **San Dieguito Bridge to I-5** or its **more northerly design concept.**

Sincerely,

Dave Clemons
[redacted]
Solana Beach, CA 92075

From: Deb C [redacted]
Sent: Saturday, June 28, 2025 12:48:55 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

To whom it may concern.

I own one of the condos in Del Mar Woods, in four story stacked buildings near or above the purple line proposal. I object to this rail line running under this property especially given the age and height of these buildings which house many families. The solution must involve disrupting as few properties and people as possible and this line does not do that.

Thank you
Deborah Clendaniel
[redacted]
Del Mar, CA 92014

From: [redacted]
Sent: Sunday, June 29, 2025 7:34:09 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Realignment

Dear Board Members,

The LOSSAN train realignment project today is discussed only within San Diego Country. No matter which route you choose through or around Del Mar, there is a significant bottleneck in San Clemente that must be simultaneously addressed by The Orange County Transportation Authority (OCTA). In San Clemente, there are frequent train closures due to the failing cliffs above the train track, and the high tides from the ocean next to the train track. There is no long-term solution where the track is today. Certainly, it would be impossible to double track for high-speed trains in that location. Thus, what is the point of double tracking for high-speed trains in Del Mar if all trains are stopped in San Clemente.

There are significant issues with the Pink Line and the Green Line routes. These routes are environmentally damaging and lack community support Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, I strongly urge you to remove the Pink Line and Green Line routes from further consideration.

Sincerely,

Pamela Coker

[redacted]

Outlook

SDLRR Project NOP

From Steve Colton [redacted]
Date Wed 6/25/2025 4:36 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Steve Colton
San Diego, CA 92103

From: Vicki Conlon [redacted]
Sent: Friday, June 27, 2025 4:12:44 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Kaiena Conlon
San Diego County Resident

Outlook

SDLRR Project NOP

From STEVEN CONLON [redacted]
Date Wed 6/25/2025 5:00 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act

and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Steve Conlon
San Diego County Resident

From: sandra Conners [redacted]
Sent: Friday, June 27, 2025 10:26:06 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Del Mar train

To whom it may concern:

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

Sandra conners

Sent from my iPhone

From: Deb Cono [redacted]
Sent: Thursday, June 26, 2025 7:06:17 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

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area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Deb Cono
Lifelong SD Surfer
Encinitas

From: Casey Contreras [redacted]
Sent: Friday, June 27, 2025 12:37:59 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

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Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project

area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Casey

Outlook

SDLRR Project NOP

From tom.m.cook [redacted]
Date Mon 6/30/2025 6:49 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.
Tom Cook
San Diego, CA 92104

Outlook

Save our homes

From Kevin Coordt [redacted]
Date Mon 6/30/2025 7:50 AM
To LOSSAN Comments <LOSSANcomments@sandag.org>

Dear LOSSAN committee,

I am requesting that you seriously consider the northern yellow line option for the train. I live at [redacted] Luzon in Del Mar, right near the portal of several of the options. My family has lived in this home since 1973, we would be devastated to have our home impacted or eminent domain because of the train.

I urge you strongly consider the northern yellow line That will not impact any homes in Del mar.

Sincerely, Kevin Coordt.
Sent from my iPhone

From: Wendy Cordell [redacted]
Sent: Wednesday, May 28, 2025 11:22:15 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: del mar train route

Hello,
we are unable to attend the meeting on 5/29/25 pm regarding the del mar train route alternatives. We would like to communicate that we are in support of the northern yellow line alternative, rather than the other routes that are being considered.
Thank you,
Wendy Cordell and Fred Shahan
homeowners and permanent residents at [redacted], Del Mar

From: Jerry Costephens [redacted]
Sent: Monday, June 30, 2025 8:38:18 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Train Realignment

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

Jerry and Fay CostephensSent from my iPhone

Attachments: image001.png
SANDAG from Dr. Covington 5-28-25.pdf

From: Laura Waligorski <info@stephaniecovington.com>
Sent: Thursday, May 29, 2025 12:15:57 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Attn: LOSSAN Comments

I am currently traveling and unable to attend the SANDAG "Notice of Preparation" Scoping Meeting Tomorrow Evening, May 29th at 6 PM.

Please find attached a letter regarding my feedback on the inclusion of the Northern Yellow Line.

Thank you,

Dr. Stephanie S. Covington (*she/her*)
Office: 1201 Camino Del Mar, Suite 204, Del Mar, California 92014 USA
Phone: 858-454-8528 - Fax: 858-454-8598 - Email: info@stephaniecovington.com
www.stephaniecovington.com www.centerforgenderandjustice.org

Current Open Enrollment Virtual Trainings (and see our Training FAQ page):

- *Helping Men Recover* June 3-4 and 10-11, 2025 (4-day training, 4.5 hours per day)
- *Beyond Violence+/Beyond Anger and Violence+* June 4-5 and 11-12, 2025 (4-day training, 5 hours per day) ***NEW DATES!***
- *Voices* June 19-20 and 26-27, 2025 (4-day training, 4 hours per day) ***NEW EVENT!***
- *Exploring Trauma+* September 23-24, 2025 (2-day training, 4 hours per day)
- *Healing Trauma+* October 29-30, 2025 (2-day training, 4.5 hours per day)

STEPHANIE S. COVINGTON, PhD, LCSW
Institute for Relational Development | Center for Gender & Justice
www.stephaniecovington.com www.centerforgenderandjustice.org

March 28, 2025

To SANDAG:

My name is Dr. Stephanie S. Covington, and I live in Del Mar, California. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

> From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3) Has no negative impact on the City of Solana Beach
4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6) Eliminates expensive tunnels under private property and below sea level
7) Assumes the Fairgrounds will have their special events platform as planned
8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Sincerely,

Stephanie S. Covington, PhD, LCSW
Co-Director

SC/lw

Attachments: image001.png
image002.png
image003.png

From: Stephanie Covington <sc@stephaniecovington.com>
Sent: Saturday, June 14, 2025 11:49:30 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: LOSSAN Rail

To the realignment committee,

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be transferred to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to Interstate 5, keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most suitable route for both double-track high-speed commuter and freight trains. As SANDAG is still evaluating alignments, the Northern Yellow Line alignment must remain under consideration.

Sincerely,

ee

Stephanie S. Covington, PhD, LCSW
she/her/hers

Office address: 1201 Camino Del Mar, Suite 204, Del Mar

Home address: [redacted], Del Mar

Institute for Relational Development
Center for Gender & Justice
Del Mar, California
Phone: 858-454-8528 - Fax: 858-454-8598 - Email: sc@stephaniecovington.com
www.stephaniecovington.com www.centerforgenderandjustice.com

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Outlook

No Trains Through Peñasquitos Lagoon!

From Skip Cox [redacted]
Date Mon 6/30/2025 3:55 PM
To LOSSAN Comments <lossancomments@sandag.org>

Please choose the best route for the train, which is the I-5 option. Although costly, It is the best choice in the long run.

W.H. Cox
[redacted]
Del Mar, CA 92014

[redacted]

Sent from my iPhone

From: Andrew Crane [redacted]
Sent: Thursday, June 5, 2025 2:34:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Rail Realignment

Dear Sandag,
I have lived in North County since 2004 and have watched the yearly losing battle against erosion and cliff instability throughout that time. It is time to face reality and move the tracks away from the their increasingly precarious location. It seems clear to me that moving them to the East and constructing a tunnel is the only long-term solution.
Thanks for the opportunity to give my input.
Andrew Crane

From: John Daley [redacted]
Sent: Thursday, May 29, 2025 7:15:26 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: THE DEL MAR QUESTION

To SANDAG:

My name is John Daley. My wife, Page duBois and I live in Del Mar just west of Hwy 101 along the southern strip of town near where one of the planned routes would have a portal situated. It is a ghastly prospect to think that our community would be literally and figuratively debased by tunneling for high speed freight trains through the heart of Del Mar. You have a difficult decision, but some tentative decision may need to be made. And then after all, the courts will ultimately have to decide the meaning, reach and application of the concept of eminent domain.

Regards,

John Daley

Sent from my iPad

From: [redacted]
Sent: Saturday, June 28, 2025 2:05:51 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further

issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Kind Regards,
Renee DeBruin
[redacted]

From: deftos [redacted]
Sent: Wednesday, June 25, 2025 1:24:40 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Public comment for LOSSAN Realignment Project

LOSSAN Project Team,

There are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration. Thank you.

Michael Deftos

From: Michael Deftos [redacted]
Sent: Monday, June 30, 2025 4:05:02 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: LOSSAN SDLRR Public Comment

LOSSAN SDLRR Project Team,

At the Feb 28th, 2024 SANDAG Board Meeting, CEO Mario Orso told the SANDAG Board before they voted to approve further study of the routes listed in the Updated NOP that during the environmental study, the LOSSAN team would develop and study the Northern Yellow Line route proposed by a group of Del Mar residents to the same level as the other routes listed in the updated NOP. To establish and maintain public trust in the process, SANDAG must follow through with this promise and develop and study the Northern Yellow Line route to the same level as the other routes listed in the Updated NOP.

Feb 28th, 2024 SANDAG Board Meeting:

During the SANDAG Board meeting discussion on 28 Feb 2025, Bruce Ehlers, Mayor of Encinitas mentioned the North Yellow Line.

Mario Orso: "*Mayor, and maybe Keith will help me on this. The first response is what you mentioned the north alternative. Actually, we were very intrigued with that and out staff report mentions that. We didn't have time to develop it or sit down with the stakeholders, but it's definitely as our report says that we will be looking into it*."

Keith Greer: *"What we're trying to do here is develop a range of alternatives for feedback on…The additional ideas that came up today on the north yellow line, the things that people have in their minds, that's the formal process for getting that into the record. And for us to look at that. So, if we approve the action in front of us today, which is basically approving staff recommendation, if we choose that, that would include North Yellow."*

Bruce Ehlers: *"So if we approve the action in front of us today, which is basically approving staff recommendation, if we choose that, that would include North Yellow?"*

Keith Greer: "*So what we recommend is the NOP includes those four alignments. As part of the scoping for the EIR, it doesn't limit us from looking at those four alignments.*

We have to get input from the public on all options, including things like the yellow line being moved north. Or a line being shifted. That's all part of the process that we've been talking about."

Bruce Ehlers: *"So the way to get it into the study would be to, in the future, a public comment. We could add it today would be one option, but another option would be public comment to get Yellow North, I-5 in there, too."*

Keith Greer: *"So that would provide the NOP process. And I mentioned very briefly, we do a scoping report. So, we take all those comments and we discuss which ones we evaluate, the comments that came in. And the alternatives that came in and why we'd be moving certain ones forward into draft EIR."*

Bruce Ehlers: *"Is there any reason we couldn't add them today?"*

Keith Greer: *"You could but they're not built. I mean, we don't have the same level of information as we do on those four in front of you."*

Bruce Ehlers: *"But all we're doing is telling you what we want in the EIR ultimately, at least the starting set."*

Keith Greer: "*Yeah but you're also telling us to bring up that design at this point in time before we go out to the NOP. To the same level as the rest of those. And I'm not sure we're there yet."*

Mario Orso: *"You know, to be more blunt on the response, yeah* ***we're going to include the North of San Dieguito Lagoon option****. It's going to be a more alternative of the yellow line. It's written there, right? The team cannot go and say that because they follow processes and their steps. But, we're going to go,* ***we're going to start developing the alignment. We're going to develop to the same level.*** *And, you know, if it doesn't have a mega showstopper, why not include it, right?"*

Respectfully,
Michael Deftos

From: deftos [redacted]
Sent: Monday, June 30, 2025 2:53:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Re: LOSSAN SDLRR Public Comment

This is to correct the date of the SANDAG Board Meeting to Feb 28, 2025.

Sent from my iPhone

On Jun 29, 2025, at 9:05 PM, Michael Deftos [redacted] wrote:

LOSSAN SDLRR Project Team,

At the Feb 28th, 2024 SANDAG Board Meeting, CEO Mario Orso told the SANDAG Board before they voted to approve further study of the routes listed in the Updated NOP that during the environmental study, the LOSSAN team would develop and study the Northern Yellow Line route proposed by a group of Del Mar residents to the same level as the other routes listed in the updated NOP. To establish and maintain public trust in the process, SANDAG must follow through with this promise and develop and study the Northern Yellow Line route to the same level as the other routes listed in the Updated NOP.

<u>Feb 28th, 2024 SANDAG Board Meeting:</u>

During the SANDAG Board meeting discussion on 28 Feb 2025, Bruce Ehlers, Mayor of Encinitas mentioned the North Yellow Line.

Mario Orso: "*Mayor, and maybe Keith will help me on this. The first response is what you mentioned the north alternative. Actually, we were very intrigued with that and out staff report mentions that. We didn't have time to develop it or sit down with the stakeholders, but it's definitely as our report says that we will be looking into it*."

Keith Greer: *"What we're trying to do here is develop a range of alternatives for feedback on…The additional ideas that came up today on the north yellow line, the things that people have in their minds, that's the formal process for getting that into the record. And for us to look at that. So, if we approve the action in front of us today, which is basically approving staff recommendation, if we choose that, that would include North Yellow."*

Bruce Ehlers: *"So if we approve the action in front of us today, which is basically approving staff recommendation, if we choose that, that would include North Yellow?"*

Keith Greer: *"So what we recommend is the NOP includes those four alignments. As part of the scoping for the EIR, it doesn't limit us from looking at those four alignments. We have to get input from the public on all options, including things like the yellow line being moved north. Or a line being shifted. That's all part of the process that we've been talking about."*

Bruce Ehlers: *"So the way to get it into the study would be to, in the future, a public comment. We could add it today would be one option, but another option would be public comment to get Yellow North, I-5 in there, too."*

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Keith Greer: *"You could but they're not built. I mean, we don't have the same level of information as we do on those four in front of you."*

Bruce Ehlers: *"But all we're doing is telling you what we want in the EIR ultimately, at least the starting set."*

Keith Greer: "*Yeah but you're also telling us to bring up that design at this point in time before we go out to the NOP. To the same level as the rest of those. And I'm not sure we're there yet."*

Mario Orso: *"You know, to be more blunt on the response, yeah* ***we're going to include the North of San Dieguito Lagoon option****. It's going to be a more alternative of the yellow line. It's written there, right? The team cannot go and say that because they follow processes and their steps. But, we're going to go,* ***we're going to start developing the alignment. We're going to develop to the same level.*** *And, you know, if it doesn't have a mega showstopper, why not include it, right?"*

Respectfully,
Michael Deftos

From: CYNTHIA DEPUY [redacted]
Sent: Wednesday, June 18, 2025 12:02:59 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Study of the Northern Yellow Line

We are residents of the city of Del Mar and will be impacted by the train track realignment. We respectfully request that the Northern Yellow Line alignment be considered equitably for your consideration. We believe the yellow alignment makes the most sense with the least amount of negative impact for all parties.

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment remains in consideration.

Please include our input when studying the options on this extremely important issue.

William and Cynthia DePuy
[redacted]
Del Mar, CA 92014
[redacted]

From: Phil Dobranski [redacted]
Sent: Thursday, June 26, 2025 2:05:56 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG, This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

Yahoo Mail: Search, Organize, Conquer

From: Phil Dobranski [redacted]
Sent: Thursday, June 26, 2025 2:11:18 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100[?]in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

Thank you,
Phillip Dobranski

From: Phil Dobranski [redacted]
Sent: Saturday, June 28, 2025 3:16:39 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100 in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment,

Phillip Dobranski

From: Chic Dohoney [redacted]
Sent: Friday, June 27, 2025 8:54:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

I am a homeowner in the Del Mar Woods condominiums and have significant concerns regarding adverse consequences to our property of the options to construct under the Del Mar bluff. In reading the draft NOP, the Northern Yellow Line (essentially following Interstate 5) would appear to be the only logical and least risky solution.

My concerns are primarily related to the following:

1. Extended construction impact to traffic, emergency vehicle access and tourism.
2. Adverse impact to the physical structures residing above the proposed tunnel location, particularly the Del Mar Woods condominium structures that were not built to address the impact of expected vibration associated with a rail line underneath the structure.
3. Adverse impact to the health of residents on the bluff from venting of fumes from the tunnel as well as the risk of a derailment.

I am also concerned that any current cost estimate and construction timeline based on initial planning to date will be significantly exceeded. This is a consistent issue with most major new construction projects similar to this one. History demonstrates that initial planning estimates of cost and timeline for completion are significantly exceeded. This must be considered in evaluating proposed alternatives and decision making. Rest assured that selecting the bluff tunnel solution will also be met with significant legal challenges that will further contribute to cost and timeline.

In my reading of the current options, it appears that the Northern Yellow Line would be the best solution of those being considered, and as such should be further considered.

Thank you.

- Chic Dohoney

From: Colin Domonoske [redacted]
Sent: Friday, June 27, 2025 3:46:50 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Colin Domonoske

Del Mar surfer. Del Mar worker. Do the right thing!

From: Colin Domonoske [redacted]
Sent: Friday, June 27, 2025 3:47:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

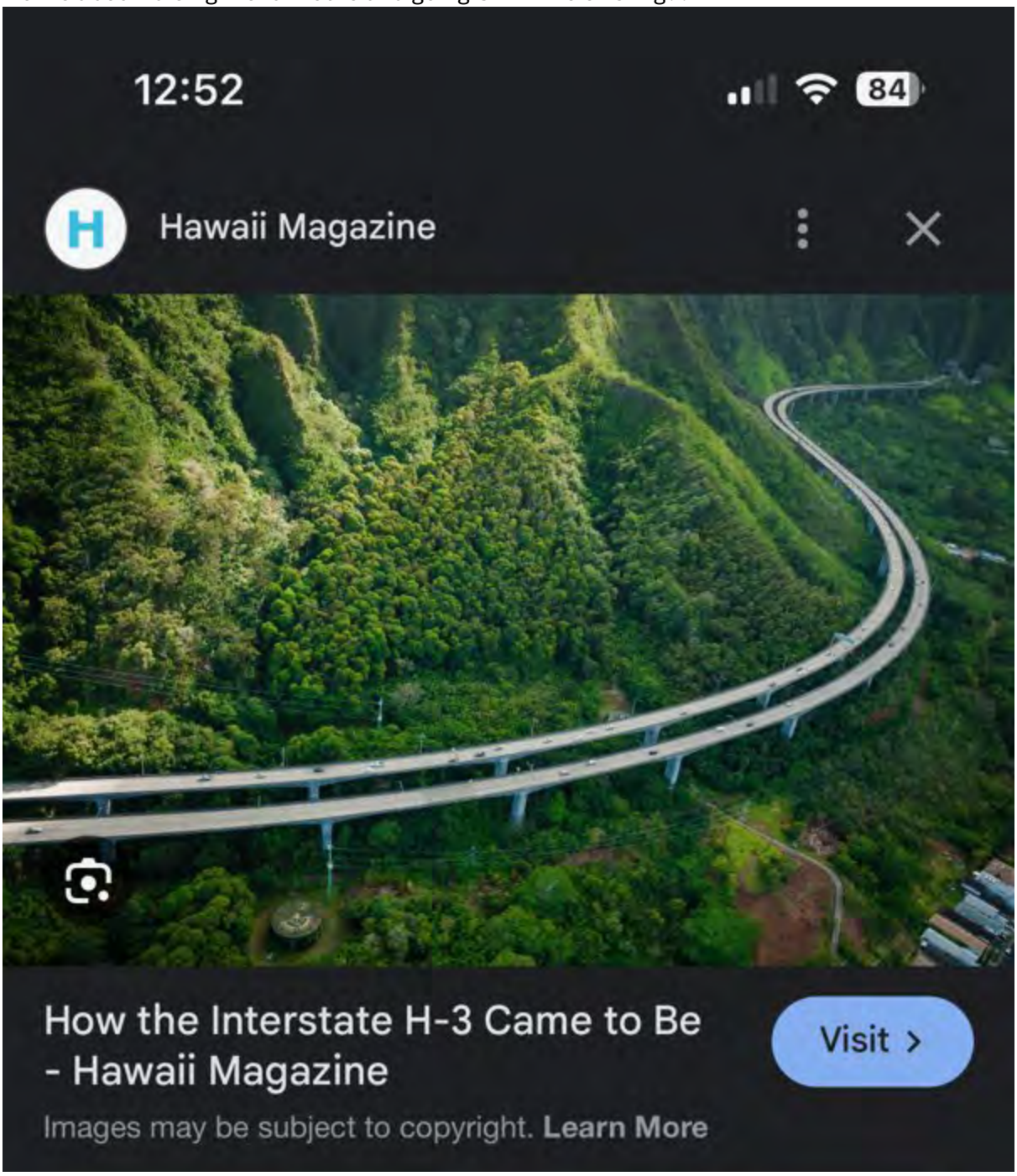
Colin Domonoske

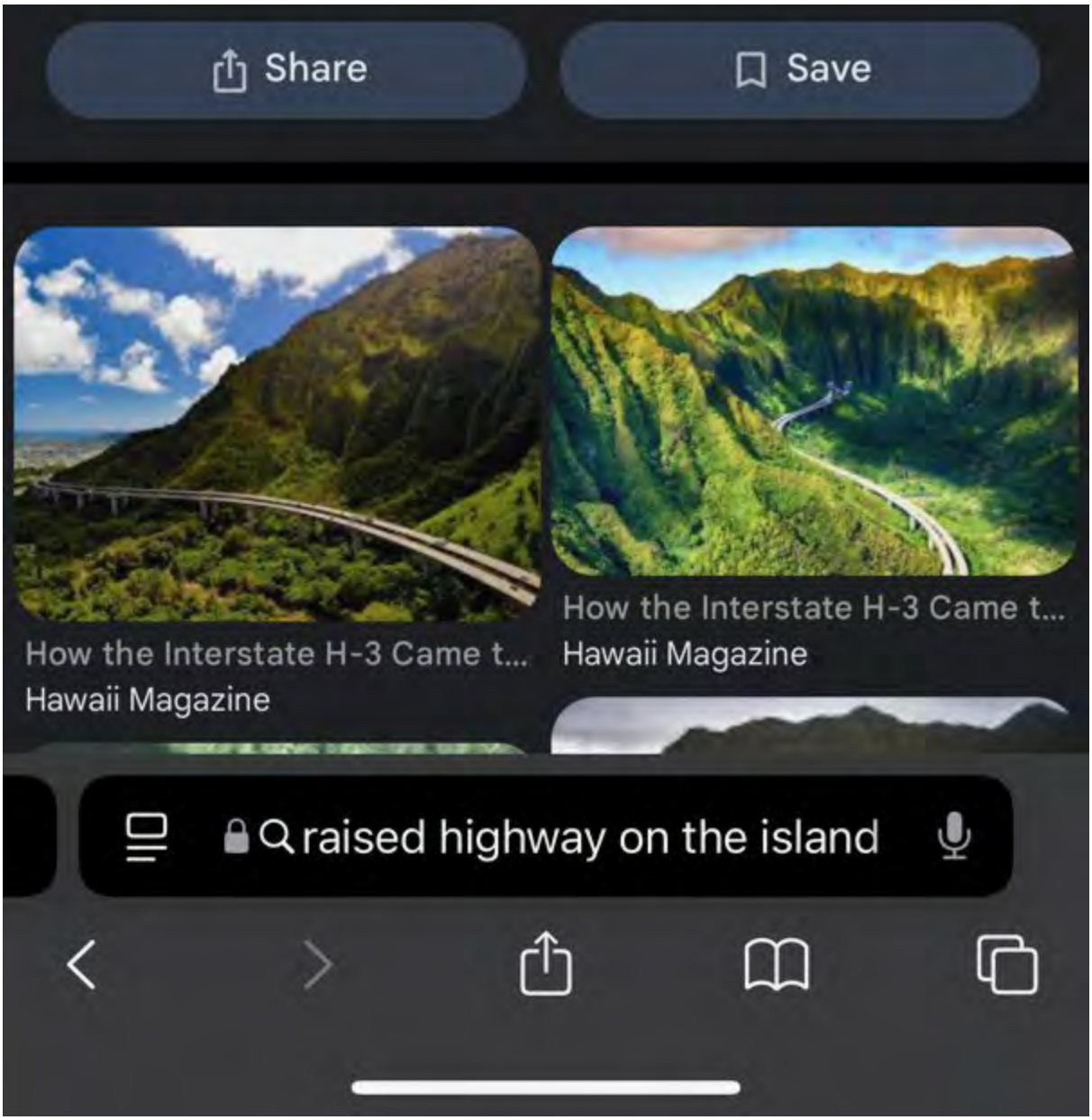
Del Mar worker. Del Mar surfer. Do the right thing!

Attachments: IMG_1324.png

From: Don [redacted]
Sent: Thursday, May 29, 2025 5:25:49 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Rail realignment

How's about raising the rail route and going OVER the existing??





Sent from my phone.

From: Margot Doucette [redacted]
Sent: Tuesday, July 1, 2025 5:52:53 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Please take the Pink Line and Green Line Routes out of consideration!

This email is to share our concerns regarding the significant issues with the proposed Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,
Margot and Dennis Doucette
Owner at Sea Point Townhomes

From: [redacted]
Sent: Friday, May 30, 2025 1:13:11 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Valérie Dufort-Roy [redacted]
Subject: Support "Northerly Design Concept"/"Northern Yellow Line" (NYL)

Dear SANDAG,

I am Valerie Dufort-Roy and live in Del Mar. I urge SANDAG to study a rail alignment that serves Del Mar, Solana Beach, and the Fairgrounds without displacing residents, harming businesses, impacting property value, or damaging our beaches, bluffs, and canyons. The four routes currently listed in the May 15 NOP are deeply problematic. The mention of a fifth option—a more northerly alignment—offers a promising alternative.

I support the "Northerly Design Concept" or "Northern Yellow Line" (NYL), which avoids impacts to homes and businesses, preserves sensitive coastal environments, and could reduce project costs by up to a billion dollars. Running along the southern edge of the Fairgrounds and crossing the San Dieguito Lagoon near I-5, the NYL minimizes tunneling, avoids portals near homes, and aligns with public land. It also supports planned infrastructure like the Fairgrounds platform and Riverpath Del Mar.

I urge SANDAG to fully evaluate this route as a viable, community-friendly solution.

Valerie Dufort-Roy
[redacted] Del Mar

Yahoo Mail: Search, Organize, Conquer

From: Ashley Dulaney [redacted]
Sent: Tuesday, July 1, 2025 2:05:41 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP- Reroute the Train!

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

Ashley Dulaney
[redacted]

From: Tally Hockey Jerseys [redacted]
Sent: Friday, June 27, 2025 6:37:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: No Pink Line or Green Line Route

Hi,

There are significant issues with the Pink Line and Green Line routes.
These routes are environmentally damaging and lack community support.
Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents.
Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Thanks,

Dave Dykes
Tally Hockey Jerseys
[redacted]

From: Robin Clark Dykes [redacted]
Sent: Monday, June 30, 2025 5:18:13 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: No to train through los Peñasquitos Lagoon

Hi-

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you

Robin Dykes
Homeowner
[redacted], Del Mar, CA 92014

From: Betty Edwards [redacted]
Sent: Saturday, June 28, 2025 1:29:32 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Pink Line and Green Line Routes

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Outlook

SDLRR Project NOP

From Jenn Edwards [redacted]
Date Wed 6/25/2025 10:40 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team:

Please accept the following comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project).

As a San Diego County resident who frequently visits the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. This "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21, which was contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035 and remove the proposed seawalls once relocation was completed. Until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state money that SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Therefore, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending.

The Del Mar Double Track alternative is not permitted under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why pursue a study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? Trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act and could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls." Yet the Coastal Act Section 30235 makes it clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures and when designed to eliminate or mitigate adverse

impacts on shoreline sand supply. Trenching the bluff and building a double track to replace the existing single track is creating a new development, not improving an existing structure, and clearly violates the California Coastal Act.

I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives. All of these alternatives are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, these tunnel alternatives comply with SANDAG's previous commitments, the California Coastal Act, and the stipulations that govern SANDAG.

Thank you for the opportunity to comment.

Sincerely,

Jenness Edwards
[redacted]
Oceanside, CA 92054

From: Erik Elam [redacted]
Sent: Saturday, June 28, 2025 6:03:44 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Realignment

To Whom This May Concern:

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. These routes would negatively affect our quality of life in so many ways, as well as forever negatively impacting the environment. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Erik Elam
San Diego, CA

From: [redacted]
Sent: Friday, June 27, 2025 5:04:20 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project

area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Cory Eldridge
Bomar Construction Co., Inc.
[redacted]

From: Barry Elliott
To: LOSSAN Comments
Subject: Train realignment
Date: Friday, June 27, 2025 5:45:30 PM

Dear SANDAG,

There are significant issues with the Pink Line and Green Line routes. These routes are significantly environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.

Barry Elliott
[redacted]
Del Mar, CA 92014

From: Robbie Elliott [redacted]
Sent: Saturday, June 28, 2025 12:46:40 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train realignment

Dear SANDAG,

There are significant issues with the Pink Line and Green Line routes. These routes are significantly environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.

Roberta Elliott
[redacted]
Del Mar, CA 92014

From: Jean-Francois Erforth [redacted]
Sent: Friday, June 27, 2025 3:41:03 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project

area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Respectfully,
Jean-Francois Erforth

Attachments: image.png

From: Lucy Eskeland [redacted]
Sent: Monday, June 2, 2025 9:22:15 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: LOSSAN Comments

We are Lucy and Steve Eskeland, and we have been living in Del Mar, CA, since 2001. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach, and the Fairgrounds and does not take homes from residents, destroy businesses, or cause further damage to beaches, coastal bluffs, and canyons.

SANDAG released the NOP on May 15th, showing four routes to be studied in the EIR. All four routes are highly unsatisfactory for numerous reasons, including destroying homes, businesses, beaches, coastal bluffs, and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

We are writing this letter to support the route residents call the "Northern Yellow Line."

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows: From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the NYL bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just

west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labeled "San Dieguito Bridge to I-5 Alternative Alignment," as well as the other alignments, do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would severely impact 60-plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses, and place air-polluting portals near the coast, homes, and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The NYL has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained, and there would be less boring and tunneling.

The proposed NYL route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar

2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon

3) Has no adverse effect on the City of Solana Beach

4) Places no Portals near homes, near the coast, or near the Fairgrounds; no tunnels under or near homes

5) It runs entirely along the edge of state-owned property. It minimally impacts the fairgrounds, where compensation can be paid without displacing families.

6) Eliminates expensive tunnels under private property and below sea level

7) Assumes the Fairgrounds will have their special events platform as planned

8) Allows Riverpath Del Mar to be completed as planned, which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

We hope that SANDAG members will fulfill their commitment to studying at NYL. It is clearly possible to choose a route for the realignment that protects people, homes, and businesses and our unique, rare, and beautiful coastal environment.

Thank you for your time and consideration in this urgent matter.

Lucy and Steve Eskeland
Del Mar, CA

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Outlook

SDLRR Project NOP

From Michael Esten [redacted]
Date Wed 6/25/2025 11:37 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act

and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Michael Esten
San Diego, CA

From: Mark Evans [redacted]
Sent: Friday, June 27, 2025 9:58:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Opposition to the Proposed Pink and Green Line Routes

SANDAG:

Mark and Alice Evans, Del Mar, strongly oppose the proposed pink and green line routes.

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Alice and Mark Evans
Del Mar

From: Edward Evans [redacted]
Sent: Monday, May 26, 2025 5:44:01 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject:

Hello,

I am a Del Mar resident and I think this project is terrible. No matter where the line and tunnel are placed the train realignment is going to negatively affect the City of Del Mar. In addition, the train in any location will never be a viable alternative for transporting people in this county as so few people would have access to it. Also, I think, the final cost of the project is easily going to surpass the estimates because of inflation. Likewise, I am fairly certain that if the project proceeds there will be unremitting litigation. Is this element factored into the project cost? I am fairly certain that a significant number of residents would not have purchased property if they knew a railroad line would be their neighbor.

In addition, I would hope the federal government would not fund any part of the project. I also wonder how much Berkshire Hathaway, the owner of BNSF(only RR with access to San Diego) would want to participate in funding this project. Couldn't the San Diego & Imperial Valley RR be upgraded to carry freight to and from San Diego to the rest of the United States?

The I-5 corridor would be the most viable alternative of all the bad options for the train.The only other alternative would be the present RR location; however, this route is not possible because of further beach and bluff erosion.

In summary, I think you should review Del Mar councilman Dan Quirk's review about the economic reality of this project.

CANCEL THE PROJECT!!!!

Edward Evans

Outlook

LOSSAN realignment comment

From Mfeatherby [redacted]
Date Tue 6/17/2025 10:45 AM
To LOSSAN Comments <lossancomments@sandag.org>

The Devil is in the Details.

I doubt if the vast majority of public opinions have been of much use, consisting of either NIMBY complaints or opinions based only on lines on a map or the favorable but superficial descriptions given to them. They are certainly short of having all the facts. I have been following the news about the progress of down-selecting to the current 5 options and I have been detailing and reviewing the pros and cons of each one. Everyone is stuck with Option 5 (i.e. doing nothing) until one of the other options has been selected and completed so the lengthier, complicated ones are at a disadvantage as they tend to be more expensive as well. So there is an incentive to speed things up.

I have not been privy to what went into the selection or how deep and detailed are any discussions made about the overall impacts of these options, including any ‘side effects’ of each one. The devil is in the details. I can see serious flaws in each one that must ultimately be addressed sooner rather than later (or be glossed over). One example I will only mention in passing is if the problem of dealing with the spoils that are removed from any tunnel has been satisfactorily solved. There will be many forms of pollution (particularly dust, noise and diesel fumes) associated with moving materiel around and the thousands of tons of the stuff that has to be removed and transported to some acceptable remote location. What method is planned, how long will it take, how much will it cost and will the environmentalists object and delay things further? I see any tunnel option as a local environmental disaster and public nuisance that will persist for a decade while those who are fixated on a tunnel will just see it as the cost of doing business.

I see grandiose, futuristic ideas of ultra-high speeds being attained using battery powered trains, major diversions and realignments and new stations along the way that duplicate what is already there. Before the tunnels and infrastructure have been completed and all of this has come to fruition, the bluffs will have eroded away leaving a permanent gap in the route (unless something more near-term is done).

Option 4 is a non-tunnel option and is preferred insofar as it is the simplest and most direct (almost a straight line over the approximately 1.7 mile section of track) and you can see where you are going. It avoids all the spoils problems and uncertainties associated with the tunnels. There are no changes in elevation either. It should be much quicker and cheaper to complete. A modification to Option 4 overcomes its most serious problems (IMHO). Either variation of Option 4 could be completed years ahead of any of the tunnel options and cost billions of dollars less. The current description of Option 4 involves extensive reinforcements of the bluffs to accommodate the two tracks. This is made completely unnecessary in the modification. Have the proponents of option 4 resolved how much width at the top of the bluffs is needed for a double track and where it will come from? A deeper examination shows this Option (as it stands) to be oversimplified and not practical as follows:-

Reinforcement of the bluffs is expensive, time-consuming, and a losing battle. It will require periodic maintenance because parts of the bluffs will still be exposed to the elements and be prone to degradation and collapse. Unless drastic action is taken, there is insufficient width at the top of the bluffs to accept two tracks. Take the area where the current track is already quite close to the edge, where would the second parallel track go? Moving 'inland' requires acquisition and grading of the property and the existing track is still near the edge of the bluffs. Move the second track 'outward' and it is hanging in mid-air! Is this second track going to be supported by a massive buttress of concrete and steel that would encroach onto the beach for its whole length? (I once suggested to a now-retired SANDAG member that such a buttress support could be built for the existing track and to bring in Disney 'Imagineers' to contour the face of the support to mimic the appearance of the bluffs behind it to keep everyone happy. There have been much worse ideas!)

A little more detailed thought and some common sense leads to an obvious timely solution that has so far been ignored or at least been met with resistance. Rather than sitting the second track on the top of a massive support structure, move both tracks completely off the bluffs onto an adjacent bridge or viaduct that parallels the existing track on top of the bluffs. Vacating the bluffs was an original goal for SANDAG anyway. The 'gold standard' for enabling roads and rails to by-pass unstable and inaccessible areas is a bridge/viaduct anyway. They are used all around the world. A viaduct is eminently suitable and superior in all aspects in this case. It also obviates the need to reinforce, maintain or even touch the bluffs, saving time and money. The bridge could probably be built before the extensive reinforcement of the bluffs was completed. The bluffs would be left alone to naturally degrade in their own time and the old track bed could be made accessible to the public.

A viaduct can have bad connotations if it reminds anyone of the Hanford viaduct being built in the desert for the high speed train. This concrete monstrosity is an eyesore whereas there are many elegant, low profile styles to emulate. (I can provide examples.) This bridge would be shorter than the Coronado Bridge for example, be on one level and be much simpler to build. One design in particular is aesthetically pleasing and well suited here. It could be modular and built offsite and just erected as needed at the base of the bluffs. The widely spaced columns would have their footings buried under the sand and

barely impact the beach. (A complete sequence of events has been worked out. There are no technical barriers to this idea.)

A comprehensive unbiased ‘pros and cons’ list (including realistic costs, timelines and potential problem areas) would show this to easily be the best technical and engineering solution. This sort of thing used to be my forte so it should not be summarily dismissed out of hand.

Additionally, while on this subject, another tunnel has been proposed to bypass the Miramar Loop. Again, bridges are more versatile and are the preferred structures for transportation. Consequently, it should make sense to evaluate a similar double-tracked viaduct to circumvent the Miramar Loop. It would mean that trains could sweep past the Loop at full speed to improve the LOSSAN service, instead of leaving the trains to crawl around the Loop on a single track perched on an unstable ledge at about 10-20 mph. The proposed tunnel shortcut is touted to save 6-7 minutes in travel time over the current path. The double track would be on one level over the canyon and the time savings claimed for the tunnel shortcut is minimized by the superior speed possible on the bridge. Once again all the uncertainties of digging a tunnel and facing unforeseen problems from bypassing the Loop this way are eliminated.

It appears that thousands of hours have already been spent on investigating and promoting different tunnels, both at Del Mar and Miramar, trying to justify them as though they were only the only viable options and very little or no attention has been given to other alternatives for one reason or another. Tunnels are usually chosen as a last resort when there are no other viable options. I have shown that there are other options in these two cases and if an unbiased, bona fide effort was expended to look at the bridge options in as much depth as the tunnels have received, I’m sure many minds would be changed. Option 4 is flawed as are all the tunnel options, but the bridges offer a quicker, cheaper, safer way to bypass the problem areas.

There is no doubt that the modified Option 4 (with the bridge bypass) is, by far, the fastest way to get the trains and track off the bluffs. If this was coupled with the construction of the bridge bypass around the Miramar Loop, there would be no remaining obstacles to prevent having a continuous double track from at least Carlsbad to south of the Loop and on to Downtown in a reasonably short time - without the complications associated with tunnels. Those remaining lengths of single track seem to have sufficient real estate around them to readily allow double tracking.

Respectfully,

Michael Featherby, Ph.D.

[redacted]

From: William Fenick [redacted]
Sent: Wednesday, June 25, 2025 5:22:28 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

William R. Fenick
[redacted]

From: Hildy Fentin <hfentin@hcesq.com>
Sent: Monday, June 30, 2025 8:33:55 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Opposition to double -tracked high speed train project

To Whom This May Concern:

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, I strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Hildy Fentin

HILDY FENTIN | **Partner & Chair of the Family Law Mediation & Collaborative Group**
Henderson, Caverly & Pum LLP
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Please consider the environment before printing this email

From: Michael Lynn Filio [redacted]
Sent: Wednesday, June 25, 2025 11:03:54 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because

trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

Yahoo Mail: Search, Organize, Conquer

From: Daria Flores [redacted]
Sent: Wednesday, May 28, 2025 11:57:03 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Rail realignment

Has anyone considered extending the trolly to Solana beach train station and using that for all passengers between there and downtown? Existing tracks, which the military intends to still use, could be used for freight only. This plan could alleviate a lot of rush hour traffic as well, and offer a more frequent ride schedule for users.

Thank you

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Sent from my iPhone

From: [redacted]
Sent: Saturday, June 28, 2025 7:39:14 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Opposition To SANDAG Proposals

6/27/2025
SANDAG;
Once again **THE PEOPLE** are expressing their total opposition to the proposed double-tracked, high-speed train project which includes a massive tunnel planned at the foot of Sea Point & Sea Village, and a construction process expected to last 10 years with 100,000 truckloads of dirt transported down Carmel Valley Road to I-5. After completion, we could face continuous noise from exhaust fans expelling diesel fumes right upwind of our neighborhood.

Unfortunately, this process has been restarted multiple times, making it increasingly imperative for us to voice our concerns to SANDAG repeatedly, and prevent the unnecessary destruction of our homes, our precious Penasquitos Lagoon, and the wildlife.

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we ***strongly urge you to remove the Pink and Green Line routes from any further consideration****.* ***Move the tracks inland, OUT of the Lagoon and NOT Under anyone's homes!!***
Thank you,
Maggie Flower

From: [redacted]
Sent: Sunday, June 29, 2025 8:09:13 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Remove Proposed Pink and Green Lines Routes From Consideration!

6/27/2025

SANDAG;

Once again **THE PEOPLE** are expressing their total opposition to the proposed double-tracked, high-speed train project which includes a massive tunnel planned at the foot of Sea Point & Sea Village, and a construction process expected to last 10 years with 100,000 truckloads of dirt transported down Carmel Valley Road to I-5. After completion, we could face continuous noise from exhaust fans expelling diesel fumes right upwind of our neighborhood.

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"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we ***strongly urge you to remove the Pink and Green Line routes from any further consideration****.* ***Move the tracks inland, OUT of the Lagoon and NOT Under anyone's homes!!***
Thank you,
Maggie Flower

Outlook

Please remove pink and green line routes from further consideration

From Jim Foster [redacted]
Date Fri 6/27/2025 8:11 PM
To LOSSAN Comments <lossancomments@sandag.org>

To whom it may concern:

As a concerned, community member,I am writing to express my concern about the proposed real development project.There are significant issues with the Pink Line and Green Line routes. These routes are environmentally harmful and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, I urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Jim Foster

Sent from my iPhone

From: Thomas Frankie [redacted]
Sent: Thursday, June 26, 2025 8:37:34 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train tunnels

Sirs,

Please do not use the Pink Line or Green Line routes for any tunnels in the Del Mar area.
They would have a detrimental effect on many homeowners.

I have also questioned whether you are planning one tunnel, or 3 parallel tunnels.
I believe one tunnel is not safe for passenger train traffic.

Tom Frankie
Del Mar, Ca.

[redacted]

From: Chris Frederick [redacted]
Sent: Friday, June 27, 2025 4:55:39 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

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Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project

area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Attachments: image001.png
SANDAG letter 060725.docx

From: John Freedman [redacted]
Sent: Wednesday, June 11, 2025 11:25:10 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Letter for SANDAG

Please see the attached letter regarding support for the option: San Dieguito Bridge to I-5 Alternative Alignment.

Please confirm receipt. Thank you.

John Freedman

John Freedman MD MBA *(he/him)*

www.freedmanhealthcare.com

Attn: Clerk of the Board
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

June 9, 2025

Dear Honorable Members of the Board of SANDAG,

I appreciate the time and effort the Board has invested in safeguarding the future of this rail corridor. Having reviewed the revised SANDAG report and recommendations, and having commented on the previous (and essentially identical) version of options, I would like to take this time to comment on the ones currently under consideration. **The best option is San Dieguito Bridge to I-5 Alternative Alignment.** Let me explain why.

First, imagine no rail line existed and SANDAG were charged with finding a route from Sorrento Valley to Solana Beach. It is almost impossible to imagine that a crossing of Los Penasquitos lagoon and Torrey Pines State Reserve would be considered. This highly sensitive and treasured habitat serves enormous environmental benefits, not least as a bastion of a rare and vanishing ecosystem, but also as a natural buffer against sea level rise. There is one option that offers the opportunity to undo the terrible wrong that was done in the original laying of these tracks, the I-5 Alternative Alignment. Removing the existing railroad berm and bridge is worth billions in environmental benefits.

Second, all three western routes will worsen the situation in the lagoon by destroying additional habitat for construction of new portals and additional berm and bridge.

Third, assuming the new rail line should last at least 100 years, the easternmost route offers the best protection against the sea level rise and the expected more frequent, severe storms, as well as the risk of tsunamis over that time.

Fourth, the I-5 Alternative Alignment will reduce the costs of taking valuable property from private landowners. The worst option (the alternate along Camino Del Mar) is likely to require hundreds of millions of dollars of remediation to homes and businesses along the route, to compensate for takings and damages. That degree of disruption would represent a huge and possibly fatal blow to the business district and neighborhoods of Del Mar.

The Board faces a choice among options, none of which is ideal. However, it is clear that one option is substantially better than the others: **the San Dieguito Bridge to I-5 Alternative Alignment.**

I strongly encourage the Board to choose this best option and get started on securing the future of the LOSSAN corridor for commuters, freight haulers, our national security and the benefit of San Diego County, the state of California, and the United States.

Thank you for your consideration.

Sincerely,

John Freedman MD
[redacted]
Del Mar, CA 92014

From: Pauline Amar Freedman [redacted]
Sent: Wednesday, June 11, 2025 10:33:49 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Rail realignment

To members of the SANDAG Board:

Thank you for the Board's continued work to protect the future of the LOSSAN corridor. After reviewing the revised SANDAG report and its recommendations I'm writing to reaffirm my support for one option: the San Dieguito Bridge to I-5 Alternative Alignment.

Imagine for a moment that no existing rail line ran between Sorrento Valley and Solana Beach. Would anyone today propose cutting through Los Peñasquitos Lagoon and Torrey Pines State Reserve? Unlikely. This is a critically sensitive ecological zone, both as a rare habitat and as a natural defense against sea level rise. The I-5 alignment offers a once-in-a-generation chance to undo a damaging decision from the past and remove infrastructure that has long compromised this vital landscape. The environmental upside is massive.

By contrast, all three western alignments would further degrade the lagoon with new portals, berms, and bridge impacts — compounding the original harm.

Looking ahead, the easternmost route is the only option that anticipates rising seas, stronger storms, and even the possibility of tsunamis. It's the only path that treats climate risk with the seriousness it demands.

The I-5 route also minimizes the burden on private property owners. The worst-case scenario — the Camino Del Mar alignment — would likely trigger hundreds of millions in compensation and legal costs, while inflicting lasting damage on Del Mar's business district and surrounding neighborhoods.

No route is perfect. But one stands out as clearly more sustainable, resilient, and cost-effective: the San Dieguito Bridge to I-5 Alternative Alignment.

Please prioritize this choice and move forward with protecting this critical infrastructure for future generations of Californians and Americans.

Thank you.

Pauline Amar Freedman

[redacted] Del Mar, CA 92014

From: Clive Freeman [redacted]
Sent: Sunday, June 29, 2025 12:18:20 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Clerk of the Board <Clerkoftheboard@sandag.org>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; assemblymember.boerner@assembly.ca.gov <assemblymember.boerner@assembly.ca.gov>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; Gaasterland@gmail.com <Gaasterland@gmail.com>
Subject: SDLRR Project NOP

Dear Honorable Members of the SANDAG Board,

I submitted this via the SANDAG online portal but received no acknowledgment that it had been received. I am therefore submitting these comments by email as well.

Thank you for your continued dedication to shaping the future of regional transportation.

After carefully reviewing the current report and proposed alternatives, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment. I believe this is the optimal choice for the following reasons:

Long-Term Resilience: In the face of climate change, it is essential to ensure our infrastructure remains resilient for the next century. Only the I-5 alignment effectively avoids the long-term risks posed by sea-level rise.

Environmental Stewardship: No responsible planner today would choose to divide a sensitive ecosystem such as the Los Penasquitos Lagoon. The I-5 option preserves this vital habitat.

Community Protection: The I-5 alignment minimizes the need for eminent domain and reduces impacts on Del Mar's neighborhoods and businesses.

Habitat Preservation: All western alternatives would require extensive new construction within protected habitats, causing unnecessary environmental harm.

While no solution is without compromise, the I-5 Alternative clearly emerges as the most environmentally responsible, climate-resilient, and least disruptive option. I urge the Board to act decisively to protect our ecosystems, safeguard our communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

Clive Freeman, [redacted] Del Mar, CA 92014

Outlook

SDLRR Project NOP

From Debra Frischer [redacted]
Date Thu 6/26/2025 11:04 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Sincerely,
Debra Frischer

Sent from my Verizon, Samsung Galaxy smartphone

From: Sharon From [redacted]
Sent: Friday, June 27, 2025 7:59 AM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Del Mar Train Tracks

Dear LOSSANcorridor,

I am writing to express my vote regarding the Del Mar portion of the train tracks:

> I strongly support keeping the train tracks along I-5 through Del Mar.
>
> I strongly oppose existing proposals, particularly those that would destroy existing houses.

Sincerely,

Sharon From

Outlook

SDLRR Project NOP

From Jesse Fulton [redacted]
Date Wed 6/25/2025 11:30 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

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Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

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Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Jesse Fulton

From: Laura Fulton [redacted]
Sent: Monday, June 30, 2025 11:55:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Fwd: Objections to the Pink and Green Line Routes

I am writing to express my deep concern with the consideration of the Pink Line and Green Line routes, which are environmentally damaging, leave communities unsafe and increase the risk of harm during catastrophic events such as wildfires, and have no community support. The I-5 Knoll location for the southern portal has strong support from the environmental community and location residents. To continue analysis of the Pink and Green Line routes is an obvious waste of taxpayer dollars. Therefore, I strongly encourage you to remove the Pink Line and Green Line routes from further consideration.

I appreciate the thought and foresight that SANDAG has exercised in planning the rail realignment, in addition to the solicitation of community input during the planning process. During that process, it has become increasingly apparent that the Pink Line and Green Line Routes are an undesirable and untenable option because of its negative environmental and community impacts, including the potential displacement of a long-term community. The Del Mar Terrace community in general poses one of the more affordable housing options in Del Mar, including a large multi-family development. The Pink Line and Green Line options adversely impact that community, including potential family displacement due to the need to exercise eminent domain. During an ongoing housing crisis, a plan that removes community members from homes otherwise outside of an environmentally degraded area should be disregarded outright.

Further, the environmental impacts of the Pink Line and Green Line options threaten protected wetlands and local wildlife in a manner that the I-5 Knoll avoids. Proceeding with Pink Line and Green Line options would perpetuate the railways' negative impacts on the Lagoon and potentially generate additional ones by converting the currently lightly-used single track into a heavily-used double track alignment through the center of the Los Peñasquitos Lagoon, with entirely new areas added at the northwest end. This would
require raising and widening the existing berm in the Lagoon to address flooding and sea level
rise projects. As climate change results in the potential for ongoing sea level rise,

it remains unclear that the raised berm would meet changing environmental needs. The I-5 Knoll prepares the rail corridor for sea level impacts and climate evolution. Further, as construction proceeds, the environmental impacts that will result from construction of Pink Line and Green Line options will further degrade the lagoon. The Lagoon is prone to flooding during rains – the measures necessary to protect the construction site during weather events (preventing sediment, debris and construction materials and fluids from leaving the construction site) are also avoidable through selection of the I-5 Knoll.

Further, Pink Line and Green Line options clearly would not further the stated project objective of "avoid[ing] and/or minimiz[ing] impacts on biological, cultural, and recreational resources of national, state or local significance, including publicly owned parks, beaches, wetlands, ecological reserves…" and should be rejected for further consideration on that basis. The Pink Line and Green Line options clearly would have significant adverse impacts on the Lagoon and its important biological and wetland resources, which is inconsistent with stated project objectives. For instance, these options could result in degradation or destruction of protected Torrey Pine trees concentrated in the area of construction. Additionally, the Pink Line and Green Line options present threats to the ongoing enjoyment of the Torrey Pines State Beach – a treasured resource for San Diego County community members – because of the planned staging at the state beach parking lot that will limit access to the state park and beach.

Finally, the proposed project should avoid, or at the very least limit impacts to sensitive species and their associated essential habitats present within the Lagoon within and adjacent to the project site to the maximum extent feasible. The I-5 Knoll route would avoid much of the Lagoon by relocating the railway alignment adjacent to I-5 with a small portion of adjacent wetland and upland habitat potentially being affected. The Pink Line and Green Line options maintains much of the current alignment through the Lagoon while also penetrating an undisturbed area adjacent to the proposed portal and expanding the width and height of the existing rail embankment to accommodate double tracking and sea level rise. As such, the Pink Line and Green Line options will likely result in the most impacts to sensitive species and their associated sensitive habitats. Replacing large sections of berm with a bridge proposed as part of the Pink Line and Green Line options may improve conditions beyond their existing state but could present an additional suite of impacts to listed species that forage and nest within the vicinity of the existing alignment due to noise, vibration, lighting and other components associated with construction and subsequent rail use. Based on this, as recommended by the Los Penasquitos Lagoon Foundation, the

proposed EIR/EIS consider potential direct and indirect impacts to sensitive species within the Lagoon that include light-footed Ridgway's rail, coastal California
gnatcatcher, western snowy plover, Belding's savannah sparrow, wandering skipper, yellowbreasted
chat, white-tailed kite and other raptors, southern mule deer Iva hayesiana, Artemisia
palmeri, and Lasthenia glabrata ssp. coulteri. In addition, the EIR/EIS will need to also consider
the direct and indirect impacts to the essential habitats that support these sensitive species which
include tidal salt marsh, non-tidal salt marsh, southern maritime chaparral, coastal sage scrub,
and coastal succulent scrub.

Finally, given the TWO fires that have ignited in this area, the prolonged road closures that might result from pursuit of the Pink Line and Green Line options would leave our community with extremely limited egress, increasing wildfire risk and diminishing preparedness for other climate related emergencies such as flooding. For these reasons, , I strongly encourage you to remove the Pink Line and Green Line routes from further consideration.

I appreciate your time and consideration on this matter.

Regards,
Laura Fulton
Del Mar Resident

From: Ross Fulton [redacted]
Sent: Monday, June 30, 2025 6:26:15 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: 2025 Notice of Preparation Public Comment--Remove the Pink and Green Line Routes from Further Consideration

The Pink Line and Green Line routes should be removed from further consideration. There are major problems with the Pink Line and Green Line routes. They are environmentally damaging to the Torrey Pines State Natural Preserve and have no community support. They increase the potential need for eminent domain of local families' homes, at increased costs and hardship. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars on an already very expensive project where it has been admitted that the existing rail line must be maintained. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration. Thank you.

Best,
Ross Fulton

From: Dan Gallagher [redacted]
Sent: Monday, June 30, 2025 11:47:47 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project).

As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs.

Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful?

The Coastal Commission cannot approve this alternative for the following reasons, among others. Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Dan Gallagher

Outlook

Concern regarding Pink and Green Line routes

From Deeann Gallo [redacted]
Date Wed 7/9/2025 5:49 PM
To LOSSAN Comments <lossancomments@sandag.org>
Cc Juan Gallo [redacted]

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

Regards,
~Deeann Gallo, SeaPoint resident

From: Ann Garland [redacted]
Sent: Friday, May 30, 2025 12:40:04 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Saul Levine [redacted]
Subject: Supporting new proposed "Northern Yellow Line" firth proposed path for rail relocation

To SANDAG:

Our names are Ann Garland and Saul Levine and we live in Del Mar. We are writing to urge SANDAG to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods.

However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line". This proposed route is more consistent with the stated goals.

Thank you,

Ann Garland & Saul Levine

From: Brittney & Jordan Garvey [redacted]
Sent: Thursday, June 26, 2025 11:50:01 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Hello,

My name is Brittney Garvey. My family and I are avid users of public transit in San Diego county, with my husband using the train nearly every day to commute to his office near Solano beach. After learning more about the Del Mar Double Track, I was disappointed in the very real environmental harm it will bring to our local habitats.

Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.

The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources.

Thank you,
Brittney Garvey

From: Christopher Geerdes [redacted]
Sent: Saturday, June 28, 2025 5:56:48 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Realignment

There are significant issues with the Pink and Green line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents like me. Please do not misuse tax payer money to continue to analyze the Pink Line or Green Line. I strongly encourage the removal of the Pink and Green routes from consideration.

Thank you,

Christopher Geerdes
Del Mar resident and property owner

From: Katherine Geerdes [redacted]
Sent: Saturday, June 28, 2025 3:00:10 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Train Realignment

There are significant issues with the Pink and Green line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents like me. Please do not misuse tax payer money to continue to analyze the Pink Line or Green Line. Please strongly remove the Pink and Green routes from consideration.

Thank you,

Kathy Geerdes

Outlook

SDLRR Project NOP

From Celina Gentry [redacted]
Date Thu 6/26/2025 6:21 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

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Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

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In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Sent from my iPhone

From: Celina Gentry [redacted]
Sent: Friday, June 27, 2025 1:20:51 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Sent from my iPhone

From: Celina Gentry [redacted]
Sent: Friday, June 27, 2025 1:20:55 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Sent from my iPhone

From: Catherine George [redacted]
Sent: Monday, June 30, 2025 7:08:26 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Train Realignment in Del Mar

I am speaking on behalf of all residents that will potentially be affected by outside planners, especially SANDAG.

It is unfortunate that they see people as obstacles to progress rather than valuable participants. To disturb homes, livelihoods, and communities is like destroying a nation. SANDAG and their environmental partners are in it for the fees. There are plenty of studies that have taken place over the years and I believe that more are NOT needed.

Of course the train should move to the inland corridor. Will it take extra time to re-route? Yes, but that cost is far lower than the disruption that is being sought by people that are only looking to line their back pockets.

Move the train to the inland corridor and get away from yet another beautiful coastline.
While you sit in your ivory towers espousing how the ocean needs to be protected from home owners, you throw the rules out of the window to serve your own purpose.

No more rail in Del Mar or any of our coastal cities. Take the train inland and then take an uber or lyft. No one ever said that our beautiful coastal cities should bear the burden of so few passengers that have nothing to do with these cities.

Respectfully submitted,

Catherine George

From: Sandy Gereaux [redacted]
Sent: Friday, June 27, 2025 9:12:31 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Sandy Gereaux <sgereaux@goldenbits.com>
Subject: LOSSAN Corridor project

I attended your scoping meeting presentation on May 29th and was disappointed by the apparent lack of interest from the community (based on the number of people who attended). That said, I appreciate the 'experts' who were posted throughout the room to answer our questions.

I strongly support the yellow alignment (San Dieguito bridge to I-5) as this appears to have the least impact on residences or businesses. I often travel north to Del Mar, Solana Beach, and Encinitas for various activities on a daily & weekly basis. So, whatever is decided could certainly affect these activities. Obviously, anything that is necessary to stabilize the Del Mar bluffs is essential, no matter what direction is determined for the rail realignment.

As this project will be one with a very large price tag and one that likely will not start for years and will not be completed in even further years, I hope that some consideration is made to separate freight transport from commuter transport. We have the opportunity to do this now and I hope it is a consideration.

A few days ago, I read a KPBS article about electric trains. While I understand that there is substantial upfront costs, the fact that there is significantly less impact to the environment and the transportation times would be significantly less than traditional rail, I hope this is considered. If this is part of the consideration, then the widening of the tunnel would need to be part of the consideration too.

Concern: I did not hear of any roundtable or feedback from the community in Sorrento Valley, who also would be impacted by the rail realignment.

Thank you for your consideration.

Sandy Gereaux
Carmel Valley

From: Maya Gerlach [redacted]
Sent: Wednesday, June 25, 2025 4:54:02 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

From: Nat [redacted]
Sent: Wednesday, June 25, 2025 11:52:08 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you,
Nat Giraud

From: Susan Goodell [redacted]
Sent: Friday, June 27, 2025 11:38:05 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: On-going, indefinite environmental damage

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,

Susan Goodell

Outlook

SDLRR Project NOP

From Patty Gray [redacted]
Date Wed 6/25/2025 10:07 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs

Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

From: Roelof Grootenhuis [redacted]
Sent: Thursday, June 19, 2025 7:28:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Public Comments in Favor of Yellow Line Route

Dear SANDAG Team,

Our family lives on Jimmy Durante Blvd, adjacent to both proposed portal entrance locations.

After reviewing all of the proposed routes, we believe that the Yellow route alongside the I-5 corridor is the obvious choice for this project, for several reasons: 1) lowest potential cost, 2) lowest potential adverse possession and destruction of private property, 3) least disruption to the broader Del Mar community, 4) maximal fairness to all coastal cities along the LOSSAN corridor.

The costs and legal challenges involved with the use of eminent domain is the 10,000-pound gorilla of this project that must be stipulated in detail in any future analyses. It is difficult to even estimate how long the project might get held up in lawsuits over this single issue. Del Mar and Solana Beach residents will fervently fight against any attempt to take their homes for a railway they already find to be under-utilized from both a passenger and freight perspective. Even if acquisition of private and commercial properties at any/all of the portal locations is somehow negotiated, the costs will be in the **billions of dollars,** as noted in prior analysis.

It will be a cumbersome, piecemeal process where eminent domain processes are legally challenged by well-resourced individuals for each individual parcel; a logistical, legal, and financial nightmare. There must be a more concrete and transparent approach to outlining which properties will be impacted, how SANDAG plans to negotiate acquisition (while anticipating intense litigation), how ROW acquisition will be funded, and how it will impact residents and the character of these communities.

The potential impact of the entire construction process to the local community is immense. Seven (likely many more) years of construction will lead to unimaginable impacts to the local communities of Del Mar and Solana Beach for an extended amount of time. Traffic, aesthetics (both during construction and in the finished project), air quality, hazardous material exposure risk, and the risk of contamination of our waterways all need to be clearly outlined and considered for each alternative.

Lastly, none of the coastal cities potentially impacted by this rail realignment want the train to go directly through the heart of their urban area; every coastal city is aligned on an I-5 option. Placing the rail along the I-5 would be fair to all, and would not add much noise or blight than the current status quo all along the Interstate.

The bottom line is that all routes tunnelling under homes in Del Mar and placing giant portals in the Northern part of the town would be prohibitively expensive, face constant legal challenges from residents, be incredibly disruptive to Del Mar residents and visitors, and change the entire character of Del Mar in the process (especially the Northern section).
It seems unjustifiable and quixotic to pursue such drastic and extreme options when the Yellow clearly route requires the least private land and runs alongside the already existing I-5 transportation corridor. It is obvious that the Yellow route is the most realistic of the currently proposed alternatives, and should be pursued further, while other alternatives should be deprioritized or eliminated due to their many unrealistic and disruptive attributes.

Best Regards,

Roelof Grootenhuis
[redacted]
Tel: [redacted]

Outlook

SDLRR Project NOP

From Tobin Groth [redacted]
Date Wed 6/25/2025 10:13 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs

Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

Tobin Groth

From: Joana Guerra <jguerra@sandiego.surfrider.org>
Sent: Wednesday, June 25, 2025 5:27:33 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Joana Guerra | San Diego Chapter Manager | Surfrider Foundation
619.914.0669 | jguerra@sandiego.surfrider.org
she/her/ella (What's this?) I Amiga del océano

From: David Hackbart [redacted]
Sent: Wednesday, May 28, 2025 6:06:57 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; David Hackbart <dlhackbart@gmail.com>
Subject: Official Comment re: Del Mar bluffs train relocation

Hello,
My house will likely be taken by eminent domain if any your original routes are chosen. I am a multi decade resident of Del Mar. I moved into my dream house 5 years ago when mortgage rates were 3%. I have a wide ocean view from both floors, a park next to me, no visible neighbors to speak of, 3 level blocks to downtown Del Mar and I cannot replace this home. It is 100 yards south of Jimmy Durante on Camino del Mar. I live alone and have just enough room for my daughters and family to visit. I plan to build an ADU but I feel in limbo because of this project's undetermined outcome.

The market rate I will receive from an eminent domain process will not come close to replacing this because it is one of a kind. You and others may say that should be reflected in the market price, and I say it's so unique I can't find another for this price. AND I'll be forced to move from Del Mar, friends etc. AND I'll be forced to borrow at higher rates (as of now but who knows the future?).

I just can't see where uprooting so many families is not as important as a few extra dollars that don't seem to matter in most other government expenditures, but for some reason matter when it comes to uprooting family heritages. We have generational plans with this home.

You all (in gov't) have my money for the immigrants, for the homeless, for lower income, for minorities because ALL PEOPLE MATTER, including families in Del Mar. We matter too!

FIND THE MONEY PLEASE. Leave those of us alone that don't want anything to do with something that may or may not need to be done. If we can't do it right, then let's wait until we can. Destroying lives to accomplish something where other alternatives are possible is not doing it right!

Sincerely,
David Hackbart
[redacted] Camino del Mar

[redacted]

From: [redacted]
Sent: Monday, June 30, 2025 8:40:28 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: May 2025 NOP

There are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration. Thank you.

From: Kerri_KH [redacted]
Sent: Monday, June 30, 2025 9:55:08 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Comments to the NOP re: the LOSSAN Rail Realignment

San Diego LOSSAN Rail Realignment team,

Thank you for soliciting and reviewing public input. Please consider the following:

For the Del Mar Bluffs Double Track alternative: Continued high risk of service disruptions and accidents from eroding bluffs and rising sea levels--this alternative does not scale.

Negative impacts on the community and residents for the Under Crest Canyon and Camino Del Mar alternatives:

1. **Safety Concerns**: Accidents or derailments could pose serious threats (short and long-term) to residents living above a Tunnel. Particularly, in the event of a serious accident within the tunnel involving chemicals, hazardous, and/or military explosive material.
2. **Property Values**: Homes located directly above or near railroad tracks may experience decreased property values due to the safety concerns (above) making them less desirable to potential buyers and subsequently impacting the local businesses that such buyers would support.
3. **Community Division**: Building railroad tracks under housing could create a physical barrier within the community, potentially dividing neighborhoods and affecting social cohesion.
4. **Disruption during Construction**: Causing traffic congestion and re-routing, noise pollution, air & water pollution, fire & safety hazards and inconvenience to residents, and detracting visitors--resulting in loss to businesses.
5. **Alternative Options**: Considering alternative routes or methods for the railroad tracks, such as rerouting away from residential areas, water.
6. **Long-term Economic Impact**: Reduced tourism, higher insurance costs for residents, and potential reluctance of businesses to invest in the area due to perceived drawbacks.

Tunneling thru a community entails significant risks related to geology, environment, cost, public acceptance, and operational challenges.

1. **Geological Stability**: Southern California is seismically active, prone to earthquakes and landslides. Building tunnels in such terrain requires careful engineering. ***How will you ensure stability during both construction and ongoing operation? Are you considering liability consequences?***
2. **Cost Overruns**: Tunnel projects are notorious for cost overruns due to unforeseen geological conditions, environmental challenges, and construction complexities. ***How are cost being managed?***
3. **Environmental Impact**: Construction and operation of tunnels can disrupt sensitive coastal ecosystems and result in hazards such as gas emissions, fire risks, noise, air, water pollution. ***What plans do you have in place to mitigate these impacts?***
4. **Traffic and Transport Disruption**: Construction of tunnels would disrupt existing roadways and traffic patterns, leading to congestion and logistical challenges for residents, visitors, and businesses***. How will***

disruption impact local communities and businesses?

5. **Maintenance and Operation**: Tunnels require regular maintenance to ensure safety and functionality. Coastal tunnels may face additional challenges such as saltwater intrusion, corrosion, and erosion; drainage, vibration and ventilation impacts; hazardous materials risk; necessitating ongoing monitoring and upkeep. ***What is the forecast for expenses? What parties will pay for such expenses?***
6. **Emergency Preparedness**: Coastal tunnels must have robust emergency response plans in place due to the potential for incidents such as earthquakes, flooding, fires, derailments or accidents and subsequent remediation.***What safety measures and infrastructure for emergencies will be in place, and how will you ensure residents are protected?***

Careful consideration of alternative solutions that minimize impact to the community well-being are crucial. The San Dieguito Bridge to I-5 Alignment seems to be the best alternative solution with minimal impact to safety of local communities and residents, environmental impacts, noise pollution, and disruption to daily life. ***Has there been consideration given to starting the I-5 Alignment further north, e.g. Oceanside?***

Other related considerations:

- Does the primary return on investment for the rail corridor come from freight service/movement of goods? The solution should be 'fit for purpose', e.g. freight doesn't require coastal views. Realigning the tracks away from residences would allow for higher speeds, reducing travel times.
- Subsequent impacts to neighboring towns?
- The impact of closures of the connecting Orange County corridor on this project?
- What is the plan and impacts for the removal of the existing tracks?
- What is the alternative transportation for freight and passengers during construction?
- Has water ways transportation been considered as an alternative to railways?

Thank you,

Kerri and Jason Halsey

[redacted]
Del Mar, 92014

From: Kevin Ham [redacted]
Sent: Sunday, May 18, 2025 3:42:19 PM (UTC-08:00) Pacific Time (US & Canada)
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: LOSSAN Alignment Input

Dear SANDAG Board,

With decades of successful award winning experience in transportation and economic development, I believe the best alignment for the LOSSAN corridor is to keep the current alignment along the bluffs through Del Mar.

By way of background, I ran transportation organizations/prorgams from North San Diego County to South San Diego County, and also worked for CALTRANS. I served as the first full-term chair of SANDAG's rideshare program and was the co-creator of SANDAG's regional vanpool, guaranteed ride home, and telecommute programs. Further, I was involved in and actively supported SANDAG's first two successful TransNet initiatives.

Costs for transit projects typically go over budget, take longer than expected, and involve costly changes. Take for example the California High Speed Rail project and the recently revealed need for the early replacement of the Sprinter vehicles. This doesn't mean we should not pursue them, but it should mean that we take at least as much time to evaluate them as we do with our highway system expansions. No short cuts in evaluating their costs and impacts and receiving robust public input.

The public is losing trust and patience when it comes to projects that take longer, cost more, aren't in keeping with community values, lack local input, and involve significant changes to original goals/plans.

The current alignment takes advantage of unique and exceptional views that support customer traffic. Traffic on the Coaster/ Pacific Surfliner may be higher due to the exceptional views of the Coastline. Other alignments will reduce or eliminate these views and may reduce ridership and increase costs.

This is not an exhaustive time list of reasons for keeping the current alignment, there are many more, but I wanted to start with my first comments on this important decision, as you consider how to move forward.

Thank you.

Kevin Ham

Attachments: To SANDAG 5-28-25.pdf

From: Mark Handzel [redacted]
Sent: Thursday, May 29, 2025 12:05:29 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: SDLRR Project NOP

Attached to this email are my inputs on the Draft EIR scope, including the alternative alignments that will be under consideration and potential environmental impacts. Thank you.

Regards,

Mark Handzel
[redacted]
Del Mar, Ca

To SANDAG:

My name is Mark Handzel and I live in Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. If the tracks can be located on top of the proposed levee by the Army Corp of Engineers, see below, it can serve two purposes:

1) protect the State Fairgrounds from San Dieguito River flooding due to climate change,
2) provide a track alignment to I-5.

This route would continus east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3) Protects the Fair Grounds from flooding
4) Has no negative impact on the City of Solana Beach

5) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
6) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
7) Eliminates expensive tunnels under private property and below sea level
8) Assumes the Fairgrounds will have their special events platform as planned
9) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

Outlook

SDLRR Project NOP

From Joseph Hartman [redacted]
Date Wed 6/25/2025 2:44 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Joseph Hartman
Pacific Beach, CA

From: bbhayward02 [redacted]
Sent: Thursday, June 12, 2025 12:51:07 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: ATTN: LOSSAN "SDLRR Project NOP"

SANDAG,
1011 Union Street, Suite 400, San Diego, CA 92101,

ATTN: LOSSAN "SDLRR Project NOP"

My name is Bette Hayward and I have lived in Del Mar, CA since 1969. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods.

However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"NORTHERN YELLOW LINE"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd.

It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.
The proposed Northern Yellow Line route offers the following advantages. It:

1. Has no negative impact on ANY homes or businesses in Del Mar
2. Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3. Has no negative impact on the City of Solana Beach
4. Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5. Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6. Eliminates expensive tunnels under private property and below sea level
7. Assumes the Fairgrounds will have their special events platform as planned
8. Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Thank you for your consideration.

Bette Hayward
[redacted], Del Mar, CA 92014

Sent with Proton Mail secure email.

Outlook

Concern Train Realignment Pink and Green Lines Routes

From Roger Heim [redacted]
Date Mon 6/30/2025 3:39 PM
To LOSSAN Comments <lossancomments@sandag.org>

To whom it may concern:

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,
Roger Heim
[redacted]
Del Mar, CA 92014

Outlook

Concern Train Realignment Pink and Green Lines Routes

From Me [redacted]
Date Mon 6/30/2025 3:55 PM
To LOSSAN Comments <lossancomments@sandag.org>

To whom it may concern:

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,
Wilasinee Heim
[redacted]
Del Mar, CA 92014

From: [redacted]
Sent: Saturday, May 17, 2025 10:48:15 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Coronado Mayor John Duncan <jduncan@coronado.ca.us>; Del Mar Mayor Terry Gaasterland <tgaasterland@delmar.ca.us>; Encinitas Mayor Bruce Ehlers <behlers@encinitasca.gov>; Lemon Grove Mayor Alysson Snow <asnow@lemongrove.ca.gov>; Oceanside CA Mayor Esther Sanchez <esanchez@oceansideca.org>; SD Mayor Todd Gloria <mayortoddgloria@sandiego.gov>; Santee Mayor John Minto <Jminto@cityofsanteeca.gov>; Chula Vista Mayor John McCann <jmccann@chulavistaca.gov>; La Mesa Mayor Mark A. <marapostathis@cityoflamesa.us>; El Cajon Mayor Bill Wells <bwells@cityofelcajon.us>; Escondido Mayor Dane White <dawhite@escondido.org>; Vista CA Mayor John Franklin <jfranklin@cityofvista.com>; Carlsbad CA Mayor Keith Blackburn <keith.blackburn@carlsbadca.gov>; Solana Beach Mayor Lesa Heebner <lheebner@cosb.org>; Imperial Beach Mayor Paloma Aguirre <paloma.aguirre@imperialbeachca.gov>; San Marcos CA Mayor Rebecca Jones <rjones@san-marcos.net>; National City Mayor Ron Morrison <rmorrison@nationalcityca.gov>; Mayor Steve Vaus-Poway <svaus@poway.org>; Mario Orso <mario.orso@sandag.org>; Clerk of the Board <ClerkoftheBoard@sandag.org>; Vice Chair and SD Dist 1 <joelacava@sandiego.gov>; LaMesa <jshu@cityoflamesa.us>; Katie Melendez <kmelendez@cityofvista.com>; Luz Molina <LMolina@nationalcityca.gov>; East County Rep. Robin Maxson <robinjoymaxson@gmail.com>; Amberlynn Deaton <amberlynn.deaton@sandag.org>
Subject: SANDAG NEEDS LONG TERM LOSSAN OPTIONS, NOT TO DESTROY CITIES

Hello,

So, despite management's pretense of openness to new routes for the LOSSAN tracks, that it had to choose and we could present new ideas at the community forums, FOX NEWS reports that SANDAG has proposed four alternatives for relocating train tracks from the eroding cliffs of Del Mar, and public feedback will be open for nearly two months. Doesn't sound like openness to new ideas to me. I, and others I'm sure, feel doublecrossed.

On SANDAG's WEBSITE FOR E-COMMENTS ON LOSSAN CORRIDOR AND EIR, it claims "The LOSSAN Rail Realignment project proposes to improve resiliency and reliability of the segment of the LOSSAN Corridor within the cities of Del Mar and San Diego, where the rail line currently runs along eroding coastal bluffs." In fact, SANDAG was told to move the tracks off the bluffs.

And again, there are only four route options.

One option to leave the track in danger's path when SANDAG was told to get it off the bluffs which keep eroding anyway. And three options, all of which end

up on the unstable, eroding beach below the Del Mar Fair and which have houses in the way which will either be terrorized by noise and vibrations from the underground tunnel beneath, have the yard taken over by ventilation shafts and other equipment, or the property expropriated outright.

And what of the people who get injured or have a heart attack in the long, probably deep, tunnel?

Basically, you are transferring the route problem and the erosion problem from the Del Mar bluffs to the Solana Beach. Who's next? The houses that will have to be demolished? Beach facilities? Other cities?

After theApril 5.2 magnitude earthquake near Julian, NCTDpaused train service between Solana Beach and Sorrento Valley to ensure passenger safety and inspect the Del Mar Bluffs for any potential damage.

Yet another commuter delay, besides all the weekend closures.

Julian is 50 miles away. Tells a lot about SANDAG, concern for safety, and the sturdiness of its structures. Weak structures, unstable soil, SANDAG doesn't seem to have done a very good job of pre-planning. How long has this been in the works?

We need a hundred year LOSSAN plan, not ten. My suggestion is a train route going up the I-5 corridor to Oceanside, then following the existing light rail corridor through South Oceanside, then through De Luz area (avoiding the homes,) with spur tracks to Camp Pen and all, not something that will be eroded or flooded in 10 years. We can connect to LA and the bullet trains better that way.

Regards,

Paul Henkin

From: [redacted]
Sent: Saturday, May 17, 2025 11:58:21 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP (SANDAG NEEDS LONG TERM LOSSAN OPTIONS, NOT TO DESTROY CITIES)

(Re-sent with SDLLR in title line)

Hello,

So, despite management's pretense of openness to new routes for the LOSSAN tracks, that it had to choose and we could present new ideas at the community forums, FOX NEWS reports that SANDAG has proposed four alternatives for relocating train tracks from the eroding cliffs of Del Mar, and public feedback will be open for nearly two months. Doesn't sound like openness to new ideas to me. I, and others I'm sure, feel doublecrossed.

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We need a hundred year LOSSAN plan, not ten. My suggestion is a train route going up the I-5 corridor to Oceanside, then following the existing light rail corridor through South Oceanside, then through De Luz area (avoiding the homes,) with spur tracks to Camp Pen and all, not something that will be eroded or flooded in 10 years. We can connect to LA and the bullet trains better that way.

Regards,

Paul Henkin

From: [redacted]
Sent: Monday, May 19, 2025 2:06:04 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP (LOSSAN TRACKS SUBJECT TO CLOSURE TOO OFTEN)

Hello,

I added a new paragraph.

Even by the time (2035) the LOSSAN REALIGNMENT is started, I fear it will be essentially obsolete.

We need a hundred year LOSSAN plan, not ten. My suggestion is a train route going up the I-5 corridor to Oceanside, then following the existing light rail corridor through South Oceanside, then through De Luz area (avoiding the homes,) with spur tracks to Camp Pen and all, not something that will be eroded or flooded in 10 years. We can connect to LA and the bullet trains better that way.

And there are significant service interruptions periodically in Del Mar (shore up the bluffs) and right now in San Clemente (landslide repairs.) Erosion problems will keep reoccurring, probably meaning a lot more service interruptions. So why keep the tracks in the same place (or even near it?)

So, despite management's pretense of openness to new routes for the LOSSAN tracks, that it had to choose and we could present new ideas at the community forums, FOX NEWS reports that SANDAG has proposed four alternatives for relocating train tracks from the eroding cliffs of Del Mar, and public feedback will be open for nearly two months. Doesn't sound like openness to new ideas to me. I, and others I'm sure, feel doublecrossed.

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And again, there are only four route options.

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And what of the people who get injured or have a heart attack in the long, probably deep, tunnel?

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As I said, we need a hundred year LOSSAN plan, not ten. My suggestion is a train route going up the I-5 corridor to Oceanside, then following the existing light rail corridor through South Oceanside, then through De Luz area (avoiding the homes,) with spur tracks to Camp Pen and all, not something that will be eroded or flooded in 10 years. We can connect to LA and the bullet trains better that way.

Regards,

Paul Henkin

From: Aidan Hernandez [redacted]
Sent: Friday, June 27, 2025 1:57:57 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project

area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.
Aidan Hernandez

Enviado desde mi iPhone

From: Patrice Hey [redacted]
Sent: Saturday, June 21, 2025 10:01:38 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANComments@sandag.org>
Subject: Northern Yellow Line Alternative

As SANDAG is moving forward with the LOSSAN Rail Realignment Project, we are now at a critical junction in this process. The main concern is that the Camino Del Mar and Crest Canyon High Speed alignments route the train, carrying hazardous materials, into and through residential neighborhoods. If SANDAG is truly representing the people in their communities, they will select the SAFEST ROUTE for the freight train to travel through our region.

Moving the tracks to a tunnel under homes only trades one dangerous train track for another. If this tunnel is built, BNSF Railroad will be carrying hazardous materials and toxic chemicals directly under Del Mar and San Diego residential neighborhoods, including homes, businesses, infrastructure and public recreational spaces. There is a safer alternative.

The Northern Yellow Linet to the I-5 is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, we are requesting that the portals are located away from homes and that the tracks are routed via the Northern Yellow Line east to the I-5.

From: Henry Higbie [redacted]
Sent: Monday, June 30, 2025 10:26:22 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Del Mar Train Line Project - Pink and Green Lines

To: SANDAG

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds.

Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,

Henry Higbie

Resident
SeaPoint Townhomes Community

Henry Higbie
[redacted]
Del Mar, CA 92014
E: [redacted]
M: [redacted]

Outlook

SDLRR Project NOP

From Alex Hill [redacted]
Date Wed 6/25/2025 10:29 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act

and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Attachments: 535EFDE3-4EDC-4A06-B8D9-D1199B5871C7.png

From: Sky.com [redacted]
Sent: Saturday, June 28, 2025 10:53:02 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Fw: Fwd: CALL TO ACTION: Please email SANDAG again re: Train Realignment

lossancomments@sandag.org:

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Pls stop this desecration of our quiet clean neighborhood!

Julie Hill

[redacted]

DM

SeaVillage

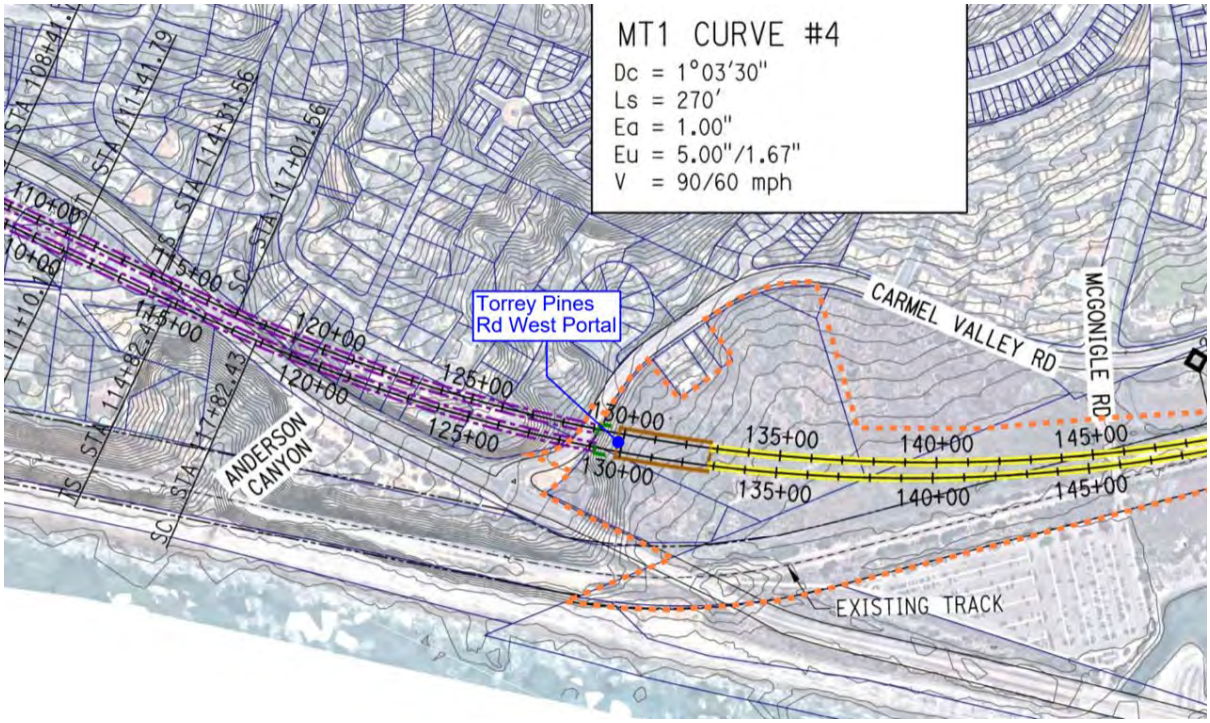
Instagram

LinkedIn

YouTube

Facebook

I'm a real person at Compass, and I'll respond to this email; but if you don't want to hear from me, click to Unsubscribe


MT1 CURVE #4
Dc = 1°03'30"
Ls = 270'
Eq = 1.00"
Eu = 5.00"/1.67"
V = 90/60 mph
Torrey Pines Rd West Portal
CARMEL VALLEY RD
MCGONIGLE RD
ANDERSON CANYON
EXISTING TRACK
110+00
115+00
120+00
125+00
130+00
135+00
140+00
145+00

Outlook

SDLRR Project NOP

From Kim Hill [redacted]
Date Sat 6/28/2025 2:33 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

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Sincerely,
Kim Hill
Carlsbad, CA

Thank you for the opportunity to comment.

From: Bobbie Hilton [redacted]
Sent: Thursday, May 22, 2025 12:26:23 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Moving the tracks from the bluff

I am totally opposed to moving the tracks to go through Solana Beach and the Fairgrounds. This would ruin all the expensive improvements Solana Beach has done , including lowering the tracks and building and landscaping the rail trail. It would adversely impact lots of businesses in Solana Beach , close down the Fairgrounds for a few years, and impact more people. It is also more expensive than the other options.

Sincerely, Roberta Hilton

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Sent from my iPad

From: Jim Hindman [redacted]
Sent: Tuesday, July 1, 2025 5:41:10 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Del Mar track relocation

I urge you to please remove the tracks from the Del Mar bluff and not consider double tracking the bluff. That would be a disaster and not solve the issue we have. The sea walls have already created an eye sore on the beach and we don't need anymore. Please preserve this beautiful California beach town and move the tracks off the bluff. An option that minimizes the impact to private homes would be the best. Thank you for your consideration.
Jim Hindman
Del Mar

Sent from my iPad

Attachments: SANDAG_Rail_Realignment_letter_Hinshaw.docx

From: JEAN BALGROSKY [redacted]
Sent: Tuesday, July 1, 2025 1:04:15 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Clerk of the Board <clerkoftheboard@sandag.org>
Cc: gaasterland@gmail.com <gaasterland@gmail.com>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; assemblymember.boerner@assembly.ca.gov <assemblymember.boerner@assembly.ca.gov>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>
Subject: SANDAG Rail Realignment Project Public Comment

Attn: Clerk of the Board
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

June 30, 2025

Dear Honorable Members of the Board of SANDAG,

In light of the latest evaluation of alternatives for the LOSSAN Rail Realignment, I offer my perspective on the preferred rail corridor solution.

After reviewing the current report and options, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment. The following points explain why this is the best option available.

With climate change, resilience over 100 years means avoiding sea-level threats—only the I-5 option provides that. We must go inland towards the I-5 and centralize with existing interstate freeway infrastructure as the most sensible approach from a construction and maintenance standpoint.

The I-5 option also minimizes eminent domain and devastating harm to Del Mar neighborhoods and businesses, which will create lengthy and costly litigations and deep distress to the community.

The western options all necessitate destructive new construction within protected habitat.

A contemporary plan should not include bisecting a sensitive area like the Los Penasquitos Lagoon.

Of all the options, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, community oriented, and least disruptive solution. Please act decisively to preserve our ecosystems, protect communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

Jean Balgrosky Hinshaw – Del Mar resident

[redacted]
Del Mar, CA 92014

Attn: Clerk of the Board
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

June 30, 2025

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Sincerely,

Jean Balgrosky Hinshaw – Del Mar resident
[redacted]
Del Mar, CA 92014

From: Gary Hoffman [redacted]
Sent: Wednesday, May 28, 2025 9:03:31 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Cc: Gary Hoffman
Subject: Del Mar Rail Realignment

Hi ,
I think it only makes sense to put the rail underneath roadwork of Camino Del Mar.
Regards,Gary Hoffman
Sent from my iPad

From: Michael Hogan [redacted]
Sent: Wednesday, June 25, 2025 7:39:44 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG, This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

Outlook

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significant issues with the Pink Line and Green Line routes

From Homa [redacted]
Date Tue 7/8/2025 4:56 PM
To LOSSAN Comments <lossancomments@sandag.org>
Cc Elizabeth Nash [redacted]

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Outlook

Double-Tracking Study - Include the Northern Yellow Line

From Nigel Hook [redacted]
Date Mon 6/30/2025 10:34 AM
To LOSSAN Comments <LOSSANcomments@sandag.org>
Cc Nigel Hook [redacted]

Dear SANDAG,

SANDAG should commit to studying the **Northern Yellow Line**, which is not just an acceptable option but the most practical, forward-looking, and responsible route for double-track high-speed commuter and freight rail, protecting our coastline while securing California's rail future.

Nigel Hook
[redacted]

From: TJ Horan [redacted]
Sent: Monday, June 30, 2025 9:12:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Re: 2025 Notice of Preparation (NOP) Draft EIR, LOSSAN Rail Realignment Project Public Comments

I have lived in the Del Mar & Carmel Valley area for nearly 30 years. I understand that SANDAG is again revisiting the issue regarding the existing train tracks thru Del Mar.

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, I strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.

Thomas Horan

From: Bill Howden [redacted]
Sent: Thursday, May 29, 2025 6:59:15 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; lossanalignment@cosb.org <lossanalignment@cosb.org>; Bill Howden [redacted]
Subject: SANDAG reail alignment project

From what I have heard so far, it seems the two-track alternative along the existing route is the best alternative. Advantages include the following.

1. The single line track is already at this location and there is an existing right of way
2. It does not shift the burden to some other location in Del Mar, or equally unfair, to other cities such as Solana Beach
3. It could be looked on as an opportunity to improve, rather than degrade:
    a. proper beach access from the areas of Del Mar along the existing route
    b. state of the art engineering techniques for rail lines and bridges on the edge of the ocean
    c. Improvements to and enlargement of the existing beach
4. It does not disturb existing and planned projects for the Fairgrounds
5. It does not require onerous expropriation of private property

Respectfully yours,

Bill Howden
Solana Beach

From: Eileen Huffman [redacted]
Sent: Saturday, June 28, 2025 6:26 PM
To: LOSSANcorridor <lossancorridor@sandag.org>
Subject: SANDAG.org/railrealignment, 6/28/2025

Will you be analyzing & informing the residents of Del Mar Heights about the following concerns in regard to the entire hillside stability west of I-5 & the effects of SANDAG/LOSSAN data collection, train tunnel construction, long-term & frequent cargo & passenger train traffic, & possible disasters, as listed in this email?

Del Mar Heights concerns & issues that need to be analyzed:

1. Complete, thorough, rigorous analysis of fragile soil above & surrounding proposed tunnels: composition, depths, erosion ratings of each area, percentages of potential collapses of canyon walls, of potential damage to residents (up to 7000 in Del Mar Heights) and (4000 in Del Mar city). While vertical boring in several areas was conducted, residents have not been informed of the data nor the analysis. Originally 5 boring sites were identified, one on Durango Dr. Since that local bore procedure, several sink areas occurred near that site. Road asphalt repairs were done, but it is sinking again. Are sink holes developing near the other 4 boring sites? During the public meeting on 5/29/'25, a representative indicated that there will be many additional borings occurring in the near future analysis. Will each boring procedure cause de-stabilization in the soils? Will just these boring procedures, alone or together, destabilize & jeopardize the entire hillside of Del Mar Heights & Del Mar city?

2. The vertical boring cores were used to identify appropriate "hard soil base" acceptable by SANDAG/LOSSAN for the train tunnel, but that information also was never presented to the public. If all the soil above the base level was not acceptable for the train tunnel construction, then it must be too fragile, & therefore susceptible to erosion. If so, the homes, people, roads, underground piping, natural flora & fauna, already located on those soils could be affected or damaged by tunnel construction, frequent cargo & passenger train traffic, long term accumulative usage, & potential human-caused disasters like explosions. An example of local erosion near & around the canyons today are the many sinkholes in nearby surrounding roads that require frequent repairs. Other erosion examples are: observable small & large chunks of surface soil in canyons that have broken away from horizontal areas & vertical canyon walls, (1

example, approximately 3'x3'x6'). Additional visual examples are cave-like formations created by collapsed large erosions along many local coastal canyons & canyon walls.

3. Besides local erosion & damage, there is a history of erosion & landslides along wider far-reaching areas. That history is documented near the Pacific Ocean, both inland & on the coast. Examples: (South to North) La Jolla Mt. Soledad about 20 years ago; coastal cliffs collapses at Torrey Pines State Reserve beach cliffs (visitor died); Torrey Pines State Reserve Extension at Del Mar Heights School east canyon wall collapse 1-2 years ago; in Del Mar/San Diego Crest Canyon north of Del Mar Heights Rd about 20 years ago a child died from canyon wall collapse; north Del Mar just east on Jimmy Durante Blvd soil eroded very near homes causing damage; Del Mar beach bluff cliffs (trains) ongoing erosion (extremely expensive, ongoing repairs); Solana Beach cliffs collapse killing people, San Clemente/San Juan Capistrano (train schedules frequent & long interruptions & expensive repairs), Palos Verdes, Pacific Palisades, Central & Northern California various mountain/hill collapses covering & closing roads.

4. Both the local canyons, south of Del Mar Heights Rd. called Torrey Pines State Reserve Extension, & north of DMHR called Crest Canyon, have together 4 steep canyon walls with only 1 block in between @ Durango Dr. These fragile canyon walls & geological formations must be protected, not exposed to vibrational forces during construction & highly frequent, continuing cargo, military & passenger trains. The entire hillside of Del Mar Heights (San Diego city) & Del Mar city with the fragile canyons & canyon walls could be & will be in jeopardy. Damage from trains on Del Mar Beach Cliffs must be rigorously evaluated & those resulting erosion consequences must not be repeated in nearby canyons, canyon walls in Del Mar Heights, & the entire fragile hillside.

5. Environmental exposure: Air, water, noise, soil contamination during both construction & train traffic usage can cause irreparable damage to humans, flora, & fauna, Torrey Pine Trees, native plants, birds, small animals. No noise, chemical, nuclear, gases, fuels, oils, fumes, should be allowed in, near, or underneath these local areas, especially near babies, children, parents, grandparents, aging citizens, people with underlying diseases & medical conditions, pets, schools, homes, walking areas, nature preserves, hiking paths, & open spaces.

Therefore, please:
1. Continue analyzing the route under I-5, inland from fragile Del Mar Heights area.
2. Reconsider: re-routing train realignment along or underneath I-15 further inland. A direct northward route from San Diego Bay cargo & naval piers, to the east sides of Miramar Air Station & Camp Pendleton, into Los Angeles rail system at Perris, Riverside

or San Bernardino. A second re-route could be, again, north directly from SD Bay piers, under/along I-15, servicing east sides of military bases Miramar & Camp Pendleton, & then just north of Camp Pendleton, re-route NW to I-5 @ Mission Viejo or Irvine. Both routes: effective, efficient, enhanced.

Thank you for your consideration of our issues in Del Mar Heights. These local nature areas are some of the finest in San Diego city & San Diego county. Please document to me that you have received this email. Respectively submitted,

Eileen Huffman. [redacted] H [redacted], C [redacted]
[redacted], Del Mar, CA. 92014

From: Jennifer [redacted]
Sent: Friday, June 27, 2025 11:31:51 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you

Jennifer Innocenti

From: Susan Instone [redacted]
Sent: Friday, June 13, 2025 9:28:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Study the Northern Yellow Line

Hello, we urge you to consider this solution to getting the tracks off the Del Mar bluffs without harming the residents, homes and businesses of our city. Please do what's right!

Sincerely,
Susan and Don Instone
[redacted]
Del Mar, CA 92014

Sent from my iPad

Outlook

SDLRR Project NOP

From Billy Jackson [redacted]
Date Thu 6/26/2025 11:31 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

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In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Sincerely,
Billy Jackson

Attachments: image003.png

From: Kimberly Jackson <kim@vrbkim.com>
Sent: Wednesday, May 28, 2025 7:33:22 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: SDLRR Project NOP

My name is Kimberly Jackson and I live in Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods.

However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

“Northern Yellow Line”

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG “yellow line” shown in the NOP that is labelled “San Dieguito Bridge to I-5 Alternative Alignment” as well as the other alignments do not satisfy a key project objective to “Minimize impacts in the surrounding communities to existing homes (and) businesses…” SANDAG’s yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1. Has no negative impact on ANY homes or businesses in Del Mar
2. Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3. Has no negative impact on the City of Solana Beach
4. Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5. Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6. Eliminates expensive tunnels under private property and below sea level
7. Assumes the Fairgrounds will have their special events platform as planned
8. Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Kimberly Jackson
FOUNDER
Vacation Rental Management

VACATION RENTALS by Kimberly

(503) 957-9354
Kim@vrbkim.com
www.vacationrentalsbykimberly.com

From: Kimberly Jackson <kim@vrbkim.com>
Sent: Wednesday, July 2, 2025 6:50:40 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: The Northern Yellow Line is the least impactful to our Community!!!

We want the Northern Yellow Line studied to the same level as the other routes in the Environmental Study

The Northern Yellow Line is the least impactful to our Community!!!

No Eminent Domain or Homes or Businesses

No Portals or Tunnels under Del Mar

Utilize Public Property

Provides the Fairgrounds their Free Event Platform

Moves the Rail over to the I-5 Transportation Corridor

No Pollution or Toxic Chemicals spewed into our Community

No Bored Tunnels under the Entire length of Del Mar

No Freight Trains under Del Mar

No Military Trains under Del Mar

No Noise and Vibration next to our homes

No Bored Tunnels in the fragile Torrey Sandstone under the full length of Del Mar

Kimberly Jackson
Resident of Del Mar, CA

[redacted]
Del mar, CA 92014

[redacted]
Del Mar, CA 92014

From: Norma Jene [redacted]
Sent: Wednesday, June 25, 2025 6:00:40 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Sincerely,

Norma Jene

Norma Kreischer
[redacted]

La Jolla, CA 92037

Outlook

Del Mar Train Tunnel

From Alison Jenks Winters [redacted]
Date Thu 6/26/2025 8:33 AM
To LOSSAN Comments <lossancomments@sandag.org>

My husband and I attended the community meeting last month, spoke with SANDAG representatives, and have read the disclosed materials on the website.

We still need real information on: actual ridership in Del Mar to San Clemente area, and the plans to address the San Clemente area along with Del Mar.

Our views:
1. We need an immediate start/completion of independent cost-benefit analyses for both the Del Mar tunnel project and the overall 60-mile segment of rail from downtown San Diego through Del Mar to San Clemente.
2. We oppose any tunnel underneath private homes or businesses in Del Mar. NO CREST TRAIL.
3. We oppose any eminent domain seizure of homes, businesses, or private property in Del Mar.

Please know we are an engaged community and will defend our property and rights. Of all of the routes, the northern route is preferable, as long as this decision makes fiscal sense.

Respectfully,
Alison Jenks

From: Barbara Johansen [redacted]
Sent: Thursday, May 29, 2025 11:51:25 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: NOP Scoping Meeting for Realignment

Attention SANDAG,
I am a 21 year resident on beautiful Del Mar!! The only realignment acceptable to me is the 5 alignment! It is the least destructive to our community!! Tunneling is unacceptable. My house is along the railroad tracks now..and the trains passing me are hardly filled! The freight trains carrying multiple cargo are heavy and vibrate my house which I assume is causing deterioration of the cliffs. It is time to do the right thing for decades to come. The speed and cost should not be the most important cocept to the determination the realignment..but the preservation of a beautiful town void of tunnels and damage to generations to come who reside here! Do the right thing! Sincerely, Barbara Johansen 23rd Street, Del Mar Sent from my iPhone

Outlook

SDLRR Project NOP

From Craig Johnson [redacted]
Date Fri 6/27/2025 1:22 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.
Craig Johnson

Sent from my iPhone

From: Janis [redacted]
Sent: Friday, June 27, 2025 11:54:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Leaders,

The Del Mar double track reinforced alternative should be removed from consideration in the draft EIR. As you have noted, trenching and double-tracking along the bluffs would require bluff stabilization and new seawalls—actions that are unlawful under Coastal Act Section 30253(b).

This alternative would cause irreversible negative impacts to the Del Mar bluffs and beaches, ultimately leading to complete beach loss as sea levels rise. While the upfront cost may be lower than tunneling, long-term costs would likely be much higher. If this alternative is not removed from the draft EIR, all potential long-term costs—including ongoing maintenance and the loss of public beach access among others—must be thoroughly studied.

Moving the tracks away from the bluffs is the most sustainable, beach-friendly, and future-focused solution and will ensure that the LOSSAN corridor remains safe, resilient, and operational. I urge you to prioritize rail relocation.

Sincerely,
Janis Jones

Sent from my iPhone

Outlook

LOSSAN Rail Realignment Project: Submit a Comment

From Fleischer Juris Doctor [redacted]
Date Wed 6/18/2025 12:14 PM
To LOSSAN Comments <lossancomments@sandag.org>

Del Mar Bluffs Double Track Reinforced Alternative Alignment is the easiest and less expensive way to go as the most practical. The other alternatives will be much more expensive and take many more years to complete.

From: Krystal Shakti Taran Kaur [redacted]
Sent: Wednesday, June 25, 2025 5:53:24 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project).

As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system

through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act.

Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR.

Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

From: Brian Kelleher [redacted]
Sent: Monday, June 30, 2025 2:09:19 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Clerk of the Board <Clerkoftheboard@sandag.org>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; assemblymember.boerner@assembly.ca.gov <assemblymember.boerner@assembly.ca.gov>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; Gaasterland@gmail.com <Gaasterland@gmail.com>
Subject: LOSSAN Alignment comments

Attn: Clerk of the Board

SANDAG

401 B Street, Suite 800

San Diego, CA 92101

June 29, 2025

Dear Honorable Members of the Board of SANDAG:

This letter is submitted in response to the Board's ongoing review of the LOSSAN corridor.

After reviewing the current report and options, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment. The following points explain why this is the best option available.

- Local businesses and homes would suffer irreparably if the western Camino Del Mar alignment is chosen.

- The lagoon can't endure more damage from berm and bridge projects in the western alignments.

- The inland route best ensures the rail's longevity through the coming century

of climate extremes.

- We have a rare chance to restore the lagoon and remove an outdated rail route.

Further, if the western Camino Del Mar alignment is chosen:

- Creating a portal in that location would require staging equipment, trucks, trailers, etc, either in the existing State Park parking lot, or in the natural lagoon habitat currently undisturbed southeast of the Del Mar Car Care property. This will pose an extreme inconvenience to users of the State Park parking lot and beach. Further, it will destroy the beauty of that landscape for thousands of residents in the South Del Mar neighborhoods, and in the condominiums and townhomes across from the State Park.
- During the construction phase of the tunnel, there will be thousands of dump trucks moving in and out of the very busy, narrow Carmel Valley Road corridor. It is a daily occurrence that traffic backs up at the signal at the intersection of Camino Del Mar and Carmel Valley Road all the way up Torrey Pines to the golf course. Adding constant, slow moving truck traffic to that equation is a cocktail for an apocalyptic traffic nightmare.
- The dirt, dust and diesel fumes from the dirt trucks moving in and out of that area will have severe, long lasting negative health effects on all of the residents in that region. It is well known that there is a constant sea breeze from the west that will carry that dust and debris into all of the homes in that area. In addition, residents in that area will be exposed to excessive levels of ABS brake dust (a known carcinogen) from the thousands of truckloads passing by their homes.
- In addition to all of the hazards that will occur during the construction phase, for the lifetime of the tunnel residents will be constantly exposed to toxic diesel fumes blown out from the tunnel to the neighborhood by the giant fans that are part of the proposed plan.

There are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration.

While no alignment is perfect, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, and least disruptive solution. Please act decisively to preserve our ecosystems, protect communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

Brian Kelleher

[redacted]

Del Mar CA 92014

From: Robert Kellerhouse [redacted]
Sent: Monday, June 30, 2025 8:48:22 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train lines

To whom it may concern

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you

Robert Kellerhouse

From: Ron Kincaid [redacted]
Sent: Friday, May 16, 2025 3:00 PM
To: Clerk of the Board <clerkoftheboard@sandag.org>; Rachel Kennedy <Rachel.Kennedy@sandag.org>; CouncilMember Joe LaCava <joelacava@sandiego.gov>; Councilmember Jennifer Campbell <jennifercampbell@sandiego.gov>; CouncilMember Marni von Wilpert <marnivonwilpert@sandiego.gov>; Councilmember Stephen Whitburn <stephenwhitburn@sandiego.gov>; kentlee@sandiego.gov; Councilmember Vivian Moreno <vivianmoreno@sandiego.gov>; CouncilMember Sean Elo-Rivera <seanelorivera@sandiego.gov>; CouncilMember Raul Campillo <raulcampillo@sandiego.gov>; Robyn Wapner <robyn.wapner@sandag.org>; lheebner@cosb.org; melanie.burkholder@carlsbadca.gov; dawhite@escondido.org; jack.fisher@imperialbeachca.gov; marapostathis@cityoflamesa.us; rvasquez@lemongrove.ca.gov; LMolina@nationalcityca.gov; rkeim@oceansideca.org; svaus@poway.org; Rebecca <rjones@san-marcos.net>; Jminto@cityofsanteeca.gov; kmelendez@cityofvista.com; Antoinette Meier <antoinette.meier@sandag.org>; Danny Veeh <danny.Veeh@sandag.org>; Chris Kluth <chris.kluth@sandag.org>; Chip Finch <chip.finch@sandag.org>; Lucinda Broussard <lucinda.Broussard@sandag.org>; Ryan Kohut <ryan.kohut@sandag.org>; Naomi Young <naomi.young@sandag.org>; jmccann@chulavistaca.gov; JDuncan@coronado.ca.us; priya.bhat-patel@carlsbadca.gov; keith.blackburn@carlsbadca.gov; cchavez@chulavistaca.gov; jpreciado@chulavistaca.gov; mdonovan@coronado.ca.us; tmartinez@delmar.ca.us; ddruker@delmar.ca.us; bwells@elcajon.gov; Steve Goble <sgoble@elcajon.gov>; jlyndes@encinitasca.gov; mmorasco@escondido.org; jgarcia@escondido.org; mitch.mckay@imperialbeachca.gov; matthew.leyba-gonzalez@imperialbeachca.gov; jshu@cityoflamesa.us; pdillard@cityoflamesa.us; jmendoza@lemongrove.ca.gov; ggastil@lemongrove.ca.gov; jrodriguez@nationalcityca.gov; dyamane@nationalcityca.gov; pweiss@oceansideca.org; EMusgrove@san-marcos.net; sjenkins@san-marcos.net; lkoval@cityofsanteeca.gov; rhall@cityofsanteeca.gov; dzito@cosb.org; jedson@cosb.org; dodonnell@cityofvista.com; jfranklin@cityofvista.com; terra.lawsonremer@sdcounty.ca.gov; Joel <joel.anderson@sdcounty.ca.gov>; tgaasterland@delmar.ca.us; Monica <Monica.MontgomerySteppe@sdcounty.ca.gov>; Dan Quirk <dquirk@delmar.ca.us>; senator.blakespear@senate.ca.gov; mike.levin@mail.house.gov; sara.jacobs@mail.house.gov; darrell.Issa@mail.house.gov; scott.peters@mail.house.gov; Teran-Sosa, Omar J <OmarJ.TeranSosa@sdcounty.ca.gov>; pdehoff@poway.org; cpikus@poway.org; jmaeda@poway.org; alex_padilla@sec.senate.gov; adam_schiff@sec.senate.gov; Keith Greer <keith.greer@sandag.org>; Tim Pesce <tpe@sandag.org>; sdonaghy@nctd.org; msannella@san-marcos.net; johara@encinitasca.gov; Ejoyce@oceansideca.org; ccontreras@cityofvista.com; lwinfree@nctd.org; mdover@nctd.org; clerk@nctd.org; LOSSANcorridor <LOSSANcorridor@sandag.org>; dj092511@aol.com
Cc: philip.diehl@sduniontribune.com
Subject: Fwd: New option for bluff-top tracks: Leave them where they are now - U~T - 05/16/2025

Gee - the picture shows a train/train tracks periously close to the edge of cliffs - AND THE CLIFFS ARE ERODING AWAY AS EVIDENCED BY THE DEBRIS AT THE BASE OF THE CLIFFS DOWN ON THE BEACH.

https://enewspaper.sandiegouniontribune.com/infinity/article_popover_share.aspx?guid=39b7c39a-c4e6-4804-ae5f-da9bcdc335dc&share=true

There is NOTHING about this that makes ANY "sense."

Billions of dollars being spent on studies and construction to "relocate" a train route/train tracks for train service that makes NO ECONOMIC SENSE/HAS NO ECONOMIC JUSTIFICAITON.

The LOSSAN "corridor" from the Orange County - San Diego County line south to San Diego isn't needed and any/all passenger and/or freight movement on that section is and can be handled by air, sea and/or truck/car/bus tranportation.

If that rail line didn't already exist, it would NEVER be built today.

Would ANY private business/corporation build that link even if they got a "sweetheart" deal on right-of-ways and tax credits?

Why is there so much resistance to eliminating this portion of the LOSSAN rail line?

Respectfully,

Ron Kincaid
[redacted]

From: BERNICE KING [redacted]
Sent: Friday, June 27, 2025 6:23:19 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject:

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

From: RITA KLIBANOV [redacted]
Sent: Wednesday, June 25, 2025 6:23:37 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SANDAG Tunnel

There are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration.
Thank you.

From: Leslie Kneeshaw [redacted]
Sent: Friday, June 13, 2025 4:38:44 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Study the Northern Yellow Line

To Whom it May Concern:

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.

Sincerely,
Leslie Kneeshaw
Del Mar, Resident

From: John Kohler [redacted]
Sent: Saturday, June 14, 2025 9:42:15 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train track tunnel alignment

Dear Honorable Members of the Board of SANDAG,

In response to the report, I urge you to adopt the alignment that offers the greatest long-term benefit.

After reviewing the current report and options, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment. The following points explain why this is the best option available.

New western routes would sacrifice even more habitat to infrastructure.

The eastern I-5 path is the only one designed to endure environmental and weather changes over 100 years.

Had planning begun today, no one would build across Los Penasquitos Lagoon or Torrey Pines.

The Camino Del Mar route could decimate Del Mar's core business area through eminent domain claims.

While no alignment is perfect, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, and least disruptive solution. Please act decisively to preserve our ecosystems, protect communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

John & DiAnn Kohler

[redacted]

Del Mar, CA. 92014

From: James Kohn [redacted]
Sent: Monday, June 30, 2025 8:17:13 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Proposed Pink and Green Lines

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

From: Daniel Kosoy [redacted]
Sent: Saturday, June 28, 2025 5:09:38 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: REJECT PINK and GREEN line routes

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.

Daniel Kosoy
Cell: [redacted]
[redacted]

From: Tyler Krupicka [redacted]
Sent: Monday, June 30, 2025 8:37:19 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: LOSSAN Comments

Hello!

My name is Tyler and I live in UTC. I'm a frequent user of the rail network in San Diego, and I'm hopeful it will improve as part of the LOSSAN plan. I agree with the recommendations from Railpac:

I support the **alternative under Jimmy Durante and Camino Del Mar to Torrey Pines Road**. This is the straightest, shortest, and lowest-cost tunnel option. The sections directly under the two streets would cause no more disruption during construction and operations than a subway tunnel under a street as has been done in many major cities worldwide, including in California. We urge SANDAG to futureproof the tunnel by building it to accommodate both an overhead contact system for rail electrification and the tall auto-rack cars that serve the Port of San Diego.

In particular I think it's very important the train becomes electric. Having used the electric corridor in SF, it's so much better than the alternative.

Thank you
Tyler

Attachments: del_mar_woods_sandag_nop_response_letter_del_mar_surfview_llc_062725.pdf

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From: lafforgue alain [redacted]
Sent: Friday, June 27, 2025 7:22:41 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Cc: Lafforgue Florence; Lafforgue Victor; Jules Lafforgue
Subject: SDLRR Project NOP

Dear Sirs,

Please find enclosed our response
Best regards,

Alain Lafforgue
[redacted]
92014 Del Mar

Envoyé de mon ipad

To: **SANDAG**

At: **LOSSANcorridor@SANDAG.org**

From: **DEL MAR WOODS HOMEOWNERS' ASSOCIATION**

Date: **June 29, 2025**

Re: **SDLRR PROJECT NOP**

Del Mar Woods Homeowners' Association Comments on Notice of Preparation of Draft Environmental Impact Report on Track Relocation ("NOP").

Dear LOSSAN SANDAG PROJECT DEVELOPMENT TEAM:

The Del Mar Woods Homeowner's Association submits the following comments to the May 15, 2025, Notice of Preparation of the Draft Environmental Impact Report for the San Diego Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project) located in the cities of Del Mar, Solana Beach and San Diego, California ("NOP").

I. INTRODUCTION

Thank you for the opportunity to comment on the updated NOP for the relocation of the train tracks off the crumbling bluffs of Del Mar. This comment is submitted on behalf of the 126 families and other owner-members of Del Mar Woods Homeowners Association ("DMW"), whose physical address is 265 Stratford Court Del Mar and whose mailing address is c/o Ron Lopezi, Menas HOA Management at 7592 Metropolitan Drive Suite 401 San Diego, CA 92108. DMW reserves the right to comment further on any revised NOP, draft EIR or EIS or final EIR or EIS. DMW thanks members of the SANDAG project team for the recent outreach at the Fairgrounds and for being responsive to questions sent via e-mail to the project team by Karen Lare, the President of its HOA. We refer in our letter to the proposed routes as outlined on the included amended NOP diagram which includes both the Northern Yellow Line Route as well as the South Yellow Line Route.

Del Mar Woods Condominium Community Location

DMW is a 126-unit condominium and townhome community located in the southwest corner of Del Mar, CA. Approximately 60 condominium homes are located between the southmost portion of Camino Del Mar, in Del Mar, looking west, and the southmost portion of Stratford Court in Del Mar, and approximately 60 units are located between the southmost portion of Stratford Court and the Del Mar Bluffs where the trains currently operate. To the direct north of the DMW HOA complex is the multi-family apartment complex of Los Arboles consisting of 97 rental housing units. East of DMW are homes along the east side of Camino Del Mar. South of DMW are more homes and a quiet reserved wooded area owned by Torrey Pacific Corporation. As a result of the multi-family housing in the southwest portion of Del Mar, the area is densely populated. The multi-family units were built in the 1970's and many of the residents therein are elderly but there are also families with young children.

Figure 3. Four Project Alternative Alignments

II. PRELIMINARY STATEMENT ON NOP OF May 15, 2025

In a review of the updated NOP, the HOA was disappointed to see that the placement of the portal areas were not changed significantly from the previous NOP, and in fact despite the extensive time spent on the value analysis study, the proposed routes did not change significantly either. Of the five routes listed only three routes would relocate the trains off the bluff (despite it being the stated objective of the $300M grant being used to do the current study, while the remaining two would have it remain on the bluffs, an idea that has been rejected by the California Coastal Commission multiple times and in fact, the need to relocate the train tracks off of the bluff was called out to SANDAG by the Coastal Commission in their approvals of both of the DMB #4 and DMB#5 bluff stabilization projects.

The NOP calls out the need to decrease travel time on the train trip from Oceanside to San Diego as one of the key objectives. The HOA has spent time studying all routes and finds that the damages and negative impacts caused to the Del Mar business owners, residents and visitors by the Purple, Blue, Yellow and Green Line Routes far outweigh any increase gained by these routes over the citizen proposed Northern Yellow Line Route. The use of eminent domain and the need to tear up the town for extended periods of

construction will create an adversarial relationship between SANDAG/NCTD/BNSF/Amtrak and the community of Del Mar which includes its annual visitors, residents, business owners and homeowners.

Members of the HOA Board have attended and spoken at several of the SANDAG Board meetings and were pleased that Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings, that he was "committed" to study the Northern Yellow Line route in the Environmental Impact Report even though it is shown only in the footnotes of the document, citing lack of sufficient time to develop the route as the reason that it was not a formal part of the recommended routes. We believe Mr. Orso will be true to his words and that in fact, this alternative route will be included as a route in the EIR study for final consideration. The HOA Board appreciates that Mr. Orso has taken the time, along with his team, to listen to the community and that the senior team seems to understand the impact the community will feel with any of the other four routes (omitting the no build route).

Specific to Del Mar Woods HOA, the path of the Purple Line Route along Camino Del Mar does not truly follow Camino Del Mar and in fact takes a turn as it approaches 4th street and goes directly under Los Arboles, a four-story apartment building, home to people of all ages and income levels, and under the two-story and three-story buildings of Del Mar Woods. The NOP shows that the train route then goes under the homes to the south of Del Mar Woods and out of a portal a few hundred meters beyond the property. The train depth under Del Mar Woods is shallow given the potential risks of train derailment and subsequent explosion from the flammable materials transported on the freight and military cars.

III. COMMENTS ON THE SOUTH PORTALS

In our review of the documents provided, there is still insufficient information in the NOP to comment **fully** on the Portal Options (or on the NOP Route Options). For example, as to portals, while there is additional information and maps, the NOP lacks critical information on the exact path of the route regarding specific location, width, height of portal, or the width, depth underground and height of the tunnel, the size and location of ventilators, the location, acreage, size of ventilation related buildings referenced in SANDAG's 2023 Tunnel Analysis Report ("2023 SANDAG Report"), noise and vibration levels of construction and operation of the trains, staging area of construction or duration of construction. **Nonetheless, there is sufficient information for DMW to make initial comments.**

The South Portal Options are as follows:

Two south portal locations have been identified depending on the track alignment. The portal locations are as follows:

Torrey Pines Road Portal

This proposed portal would be located near the intersection of Carmel Valley Road and North Torrey Pines Road. The portal infrastructure would cross underneath Carmel Valley Road and potentially extend into residential and commercial properties in Del Mar.

DMW strongly objects to the "Torrey Pines Road" south portal option. The Torrey Pines Road portal option would be located near the intersection of Carmel Valley Road and Torrey Pines Road, which is at the

southern tip of Camino Del Mar and only a few hundred meters from Del Mar Woods and many other homes and businesses. A Project Objective is to **"Minimize impacts in the surrounding communities during and after construction."** This objective is of particular importance to Del Mar residents in light of the fact that while all of San Diego is said to benefit from the rail line, it is the Community of Del Mar that is being compelled to disproportionately, and almost exclusively, shoulder the burden of the realignment. The very least that SANDAG can do is to select or create portals and a route that minimizes the negative impacts to Del Mar and its residents.

Other cities benefit from rail service, but no other city is affected by the choice of the realignment route and the portals as is Del Mar (the City of San Diego would be slightly impacted by the alternate choice of the I-5 Knoll option). The selection of the Torrey Pines Road Portal would maximize negative impact to our community. Some of the reasons, among others are:

- The portion of the Del Mar community that is very close to the Torrey Pines Road portal option is densely populated. It includes the 126-condominiums of DMW, the 97 apartments of Los Arboles, and numerous single-family homes close to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA (p.9 of the NOP):
    - Air Quality will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of fumes and pollution from diesel output and other concentrated Greenhouse Gas Emissions spewed from the ventilation systems close to their homes.
    - Virtually continuous Noise of the ventilation systems and both Noise and Vibration of continuous freight and passenger trains descending and traveling right under their homes.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Continuous **Noise** of trains entering and exiting the portal.
    - Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[1]
    - The risks of carrying **Hazardous Waste** under their homes.

[1] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

    - The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
- In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    - The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to Torrey Pines State Beach.
    - Elimination of pedestrian and bicycle paths during construction.
    - The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    - Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    - The delivery of **Emergency Public Services** will be impeded or blocked.
    - Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    - All of the detriments to Del Mar's residents discussed above.
    - The loss of additional square meters of environmentally sensitive lagoon acreage with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon.

I-5 Knoll Portal

In contrast, the construction of the alternate I-5 Knoll portal would have none of the above effects. Thus, of the few study options for the South Portal offered by SANDAG in the NOP, **the I-5 Knoll is by far the better alternative with the lesser negative impacts to the community.**

IV. COMMENTS ON THE NORTH PORTAL OPTIONS

The North Portal options in the updated NOP are as follows:

Under Jimmy Durante Boulevard Portal

This proposed portal would be located north of the intersection of Camino Del Mar and Jimmy Durante Boulevard. The portal's infrastructure would cross underneath Jimmy Durante Boulevard, which would be raised. **The portal structures would potentially extend into commercial and residential properties in Del Mar.**

I-5 Racetrack View Portal

This proposed portal would be west of the I-5 Freeway close to homes located south of the fairgrounds along Racetrack View Drive. The route would be elevated along the protected San Dieguito Lagoon right along the nesting area for the Western Snowy Plover and other native species (some endangered) which was built at great expense with the restoration of the Lagoon. This route will cause issues for wildlife and untold issues for the thirty plus homes close to that portal.

The Jimmy Durante Boulevard option ("JDB") is unacceptable. **The portal construction and operation would inflict the maximum negative impact on Del Mar, its businesses and residents**. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is not "potential," it is certain. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.

The Racetrack View Portal Option is a challenge in many ways as noted above. It is located very close to the San Dieguito Lagoon, a protected wetlands, that underwent a major restoration that began in 2006 and Phase II was recently completed in 2024. This location will dramatically impact both homes and the lagoon. While it is going to move the construction further from the City center there is no entrance to this route without going through the main intersection that supports all traffic for the racetrack and fairgrounds in and out of Del Mar. This impact will be felt by both residents and visitors, and it will dramatically impact evacuation routes with heavy equipment and trucks.

V. DEL MAR WOODS' COMMENTS ON THE NOP STUDY ROUTES

Purple Line, Blue Line and South Yellow Line Routes

For many of the same reasons Del Mar Woods Homeowners' Association objects to the Torrey Pines Rd. south portal, it objects to the Purple, Blue, and South Yellow Routes.

- Regarding the Purple Line Route, which tunnels under Camino Del Mar, the amount of disruption and destruction to Del Mar businesses in the construction process would be continuous and extreme. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city. A double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on residents' homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.

    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Accelerated bluff erosion as the vibrations from the tunnel through the sandstone will cause additional cracks in the earth allowing water penetration and erosion to occur.
- Regarding the Blue Line Route, a portal right into people's homes and at an elevation to allow noise to carry across the entire area will cause irreparable harm to many. The double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of the portal and over the tunnel will be:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to and under their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.
    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.

Green Line Route

The addition of a double-tracked bluff route was not a welcome addition to the updated NOP in our view. We understand and appreciate the staff's desire to include a non-tunnel option however it does not pass even a rudimentary feasibility test.

The purpose of the study of the proposed routes is to move the tracks off the crumbling sandstone bluff not to study ways to add additional tracks to a fragile environment. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double- track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the bluffs and beach at the expense of the public. The

almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed the California coast for 50 years. According to SANDAG, double tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:" According to the Coastal Commission "If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law does not preempt state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023.

This option also requires the use of eminent domain to take private property so that the eroded thin crumbling bluffs can be expanded to the east.

Northern Yellow Line Route

The Northern Yellow Line Route is the only one that utilizes the non-populated areas of this beachside community and public lands. It allows the route to be built with the lowest impact on residents and the least impact on businesses. It would allow businesses to remain open during construction and limits the impacts to private homes by routing the train along public lands where gaining the necessary right of way would be much simpler and less expensive.

With consideration given to maintaining the horse racing and fair schedules and to strategically planning how to do the construction staging in such ways as to minimize impact to fairground operations, this route is far superior to any of the other routes in the NOP. The impact on residents in Del Mar and San Diego would be far less and it would also limit the traffic flow disruptions for residents of all of the beach communities who use the routes through Del Mar for commuting to work or school or for access to restaurants and businesses.

This route would also dramatically limit the number of lawsuits that SANDAG and NCTD will face over eminent domain and the purchasing of land access rights and would head off the foreseeable class action suits that will be brought to compensate for generations of adverse health effects if any of the other routes are selected.

In short it has the following advantages:

1. No negative impact on ANY homes or businesses.
2. Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.
3. Places no air-polluting portals near homes, near the coast or near the Fairgrounds.
4. Bores no tunnels under or near homes.
5. Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an
   easement for which compensation can be paid to the Fairgrounds without displacing families.
6. No negative impact on the City of Solana Beach.
7. Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.
8. Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.
9. Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.
10. It is expected to cost considerably less than other routes that require tunneling right under homes and eminent domain of homes and businesses.
11. Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delays.

IV. COMMENTS ON SANDAG'S RESPONSIBILITY TO DO A "NO PROJECT" ANALYSIS AND TO HAVE A COST/BENEFIT ANALYSIS PREPARED.

As part of its draft EIR, SANDAG must do a "no project" analysis. In addition, the SANDAG Board, in fulfillment of its duty of reasonable business prudence, must have an independent cost/benefit analysis prepared.

"No Project"

CEQA requires SANDAG engineers to do a "no project" analysis as an alternative. In this case, since continuing bluff instability mandates that the trains must stop operating on the bluffs, removing the tracks must proceed. If, however, after SANDAG does a cost/benefit analysis, it is determined to move forward with relocating the tracks as opposed to finding 21st Century ways to move freight and people, then the "no project" analysis really means "not this project" and would require SANDAG engineers to go back to the drawing boards.

The inescapable fact is that implementing either the Purple Line Route, Blue Line Route, South Yellow Line Route or Double Track Green Route together with the Torrey Pines Road south portal and the JDB portal or Racetrack View Portal, would destroy Del Mar, its culture, property values and economy, and is too high a price to pay in pursuit of a form of transportation that does not fit the needs of the area. **The Northern Yellow Line Route** is the only current study route that circumvents homes and businesses and does not require the use of eminent domain at least affords Del Mar a path to survive the assault of realignment, **is the only acceptable alternative.**

V. Issues Specific to Del Mar Woods

These issues for Del Mar Woods remain the same as in our earlier comment letter on the previous NOP because the most impactful route was not significantly changed. The route chosen to study (Purple Line Route) still does not make the turn to follow Camino Del Mar but instead goes directly under part of the HOA. As a 126-unit condominium and townhouse complex built in the early 1970's, Del Mar Woods was not built to withstand the types of vibrations and shaking that will come with a loaded freight train or military transport train rumbling underneath it. With the location of the complex so close to the portal for the Purple Line Route, the depth of the tunnel underneath the complex will hardly be deep enough to protect the homes and their walls and foundations from damage. As we understand from discussions with your team, the portal openings must start high enough to account for sea level rise and can only proceed down at the maximum 2% grade. Your updated NOP documents show a depth of around 100 to 120 feet below the buildings. A quick investigation says that sandstone will allow vibrations to reach these buildings on a normal day, and any type of explosion would be catastrophic.

The buildings it will go under (as shown in the updated NOP maps) are three story buildings housing families and many older residents. The path also goes under the underground car park.

While these buildings have been retrofitted recently (2018) as per California code, that code did not contemplate loaded rail cars travelling under the three-story buildings or cement underground garages. Consideration must be given to the route plan impacting this large condominium complex and your engineers must take into consideration the building materials and techniques used at that time they were built. Stresses on buildings from vibration and the human health impacts are very real.

We have requested that your project team study the soil in this specific area as part of its geological work.

Del Mar Woods objects to selection of the Purple Line Route and urges the project team to consider the impact on not only the train (speed, duration of tunnel, costs, etc.) but the impact on the quality of life for residents and the structural impacts to real property and the impact on the price of many of the owner's largest (or only) asset.

VI. Additions needed to the NOP

- Vibrational impact studies specific to the materials used in 1970 construction of homes and garages. Specifically pertaining to three story buildings and underground parking.

- Circulation during construction for densely populated areas with limited ingress and egress options both for emergency services as well as daily access
- Impacts on housing prices before, during and after construction
- Funding of a separate account to pay for on-going damage (if the Purple Route is selected) for repairs to cracked foundations and underground cement parking garages due to shaking and vibrations
- Worst case scenarios from an explosive incident in a shallow tunnel under a three-story building
- Studies of potential health risks as noted earlier in this letter
- Study of an alternative route that directly follows Camino Del Mar with its slight curves versus the straight-line route depicted today – a one second difference in time is worth preservation of homes and residents' health

Conclusion

The residents of Del Mar Woods are supportive of the work SANDAG is doing to move the railroad tracks off the eroding sandstone bluffs but it believes that SANDAG has in its current NOP only one realistic alternative which will serve the purpose of track relocation and preserve the lives and the way of life for the Del Mar Woods owners and residents. **This is the Northern Yellow Line Route.**

Many comments have been made in SANDAG meetings urging the Board to take a longer view and find a long-term solution to move the tracks not only off the Del Mar Bluffs but out of all of the densely populated coastal towns and put them along the I-5 transportation corridor. That route however, is not an option in the current NOP. We urge SANDAG staff and Board to reconsider this option during the EIR process.

Thank you for your consideration.

Very truly yours,

Karen Lare

President, Del Mar Woods Homeowners Association, Del Mar, California.

Respond to: Karen.Lare@Yahoo.com

Cc: Del Mar Woods Board of Directors

Office of U.S. Congressman Mike Levin

Office of Senator Catherine Blakespear

California Coastal Commission: Attention Dr. Katherine Hucklebridge

Del Mar City Council

From: Abbey & Lahni [redacted]
Sent: Wednesday, June 25, 2025 10:46:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.

Abbey Lahni

"If you don't own a dog, at least one,
there is not necessarily anything wrong with you,
but there may be something wrong with your life."
Roger A. Caras

Outlook

Proposed train tunnel in Del Mar

From Kristina Lane [redacted]
Date Fri 6/27/2025 3:48 PM
To LOSSAN Comments <lossancomments@sandag.org>

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

Kristina Lane, Del Mar resident.

From: [redacted]
Sent: Thursday, July 3, 2025 9:11:25 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Re: double-tracked, high-speed train project near Carmel Valley

Dear SANDAG

As a Carmel Valley resident I strongly oppose the proposed Pink and Green Line routes.

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, I strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,

Thomas A. Lane
[redacted]
Del Mar, CA 92014

From: Lynwood Lary [redacted]
Sent: Thursday, June 26, 2025 5:06:15 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Lynwood Lary
[redacted]

Outlook

Northern yellow line option

From RJ Brdrdr [redacted]
Date Mon 6/30/2025 12:09 PM
To LOSSAN Comments <LOSSANcomments@sandag.org>

For all the below reasons, I implore you to consider with equal measure the northern yellow line as the most logical long term solution.
No Eminent Domain to Homes or Businesses
No Portals or Tunnels under Del Mar
Utilize Public Property
Provides the Fairgrounds their Free Event Platform
Moves the Rail over to the I-5 Transportation Corridor
No Pollution or Toxic Chemicals spewed into our Community
No Freight Trains under Del Mar
No Military Trains under Del Mar
No Noise and Vibration next to our homes
No Bored Tunnels in the fragile Torrey Sandstone under the full length of Del Mar

Best Regards,

Rick Lasch
Lifetime Del Mar Resident

From: Hanna Lee [redacted]
Sent: Monday, June 30, 2025 9:38:59 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Realllignment

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

From: Nancy Mac Isaac Lendaro [redacted]
Sent: Wednesday, May 21, 2025 2:35 PM
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Nancy M. Lendaro [redacted]
Subject: LOSSAN Corridor Realignment

We recommend the I-5 Knoll Portal option for the following reasons.

KEY ENVIRONMENTAL CONCERNS

1. Groundwater Disruption

- Tunnel construction can alter the local hydrogeological balance. Tunnels may act as drains, potentially lowering the groundwater table and impacting nearby vegetation and water-dependent habitats.
- While modern tunnel linings can minimize groundwater drawdown, temporary changes during construction may still occur, especially if tunneling passes beneath or near water bodies.

2. Soil Stability and Ground Movement

- The use of tunnel boring machines (TBMs) and excavation can cause soil disturbance, leading to ground movement, settlement, or even subsidence above the tunnel route. This can threaten the stability of nearby homes and infrastructure, particularly in areas with older or fragile buildings.
- Soil stiffness degradation from tunneling may increase ground-borne vibrations during future train operations, potentially by up to 10 decibels, which can be disruptive to residents and damaging to structures.

3. Vibration and Noise

- Both the construction phase and subsequent train operations generate vibrations and noise that can propagate to nearby buildings, disturbing residents and potentially affecting the usability of sensitive buildings (e.g., schools, hospitals).
- These effects are most pronounced directly above or near the tunnel alignment.

4. Air Quality

- Underground tunnels can accumulate particulate matter and other pollutants due to limited ventilation. Studies in other cities have shown that stations and

tunnels, especially those near water bodies, can have significantly higher concentrations of harmful particles.

- These pollutants include iron, manganese, and other metals from train operations, which may pose health risks if not properly managed.

5. Construction Impacts

- Construction activities will bring increased noise, dust, and heavy vehicle traffic to the area, potentially for several years.
- There is a risk of accidental damage to adjacent properties, including cracking or collapse, especially if controlled explosives are used or if the soil is unstable.

6. Habitat and Ecosystem Disruption

- While tunneling generally has less surface impact than above-ground rail, there may still be disruption to local habitats during construction, particularly if staging areas or ventilation shafts are placed in sensitive locations.
- If not carefully managed, changes in groundwater flow could affect local flora and fauna.

COMMUNITY CONCERNS FOR ADJACENT CITIZENS

- Structural Damage: Residents should be concerned about the risk of settlement, cracking, or other structural impacts to their homes and businesses from ground movement during tunneling.

- Noise and Vibration: Both during construction and after the tunnel opens, increased noise and vibration could affect quality of life and property values.

- Air Quality: Poor ventilation in tunnels can lead to higher concentrations of airborne pollutants, which may be released into nearby stations or ventilation shafts, impacting respiratory health.

- Water Table Changes: Lowering of the groundwater table could affect landscaping, trees, and possibly the foundations of some buildings.

- Construction Nuisance: Expect years of construction-related disruptions, including dust, noise, increased traffic, and potential road closures.

- Emergency Preparedness: Tunnels introduce new risks, such as fire, hazardous material spills, or derailments underground, which require robust emergency response .

As citizens, since 1978, living adjacent to the proposed Del Mar rail tunnel realignment we will be vigilant about the risks of ground movement, noise, air quality, and water table changes. While modern engineering can mitigate many impacts, careful planning, transparent communication, and robust monitoring are essential to protect community health and property throughout the project lifecycle.

Final thought- living here for 47+ years, we remember vividly the rebuilds of both bridges on Camino Del Mar/ Torrey Pines Road (one opening to the lagoon, the other over the railroad tracks). The all night long pounding of the pile drivers was but one, albeit huge, disruption to wildlife and citizens alike. It is for all the reasons listed above that we urge choosing the 1-5 Knoll Portal alternative.

Concerned citizens,
Nancy MacIsaac Lendaro &
Valentino L. Lendaro, Ret. Col, USMC

From: Patrick Leonard [redacted]
Sent: Friday, June 13, 2025 4:33:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train

Good morning. I am strongly opposed to any track solutions which tunnel under Del Mar. My first recommendation is discontinue the trains, replacing the tracks with footpaths, foliage, parks, etc … Recognizing that choice is the unlikeliest of outcomes, my second choice is to "do nothing." The bluffs are being fortified at extraordinary expense and, if the engineering is sound, the trains can run on the single track for the foreseeable future. (Your goal of reducing travel times is unimportant.) I see no NEED to double track. Thirdly, if the tracks MUST move, I recommend the Northern Yellow Line. Thank you for your time and attention.

Patrick Leonard
[redacted]
Del Mar, CA 92014

P.S. I live quite close to the tracks.

Sent from Gmail Mobile

From: Nancy Lietz [redacted]
Sent: Friday, June 27, 2025 6:56:51 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Train reroute proposals

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."
Sent from my iPad

From: greg lippert [redacted]
Sent: Thursday, May 29, 2025 4:53:00 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Del Mar Route Realignment

Hello,

My name is Greg Lippert, and I live in Old Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds, and does not take homes from residents, destroy businesses, or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15, which shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods.

I am writing this letter to voice my extreme support of the route residents are calling the "Northern Yellow Line"; SANDAG's fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

Sincerely,

Greg Lippert
Del Mar homeowner and Full-time Resident

From: Nitza Lite [redacted]
Sent: Monday, June 30, 2025 3:50:47 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Train

Please choose the YELLOW LINE when considering the future of the tracks.

It is the least intrusive on our fragile environment.

The yellow line preserves quality of life for the thousands of people who cherish this town.

The yellow line will financially impact our town in the least harmful way.

Thank you for making your decision, with heart, for the residents of Del Mar.

Nitza Lite
Del Mar, CA 92014

Attachments: DMWoods comment letter to amended SANDAG NOP 6-26-25 final.pdf

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From: jen lon [redacted]
Sent: Monday, June 30, 2025 2:56 PM
To: LOSSANcorridor <LOSSANcorridor@SANDAG.org>
Cc: Alan Lonbom [redacted]
Subject: SDLRR PROJECT NOP

Dear LOSSAN SANDAG PROJECT DEVELOPMENT TEAM:

As property owners in Del Mar we would like you to know we are in agreement with the conclusions stated in the attached letter/comments of:

Del Mar Woods Homeowners' Association Comments on Notice of Preparation of Draft Environmental Impact Report on Track Relocation ("NOP").

1. The residents of Del Mar Woods are supportive of the work SANDAG is doing to move the railroad tracks off the eroding sandstone bluffs but it believes that SANDAG has in its current NOP only one realistic alternative which will serve the purpose of track relocation and preserve the lives and the way of life for the Del Mar Woods owners and residents. **This is the Northern Yellow Line Route.**

   Many comments have been made in SANDAG meetings urging the Board to take a longer view and find a long-term solution to move the tracks not only off the Del Mar Bluffs but out of all of the densely populated coastal towns and put them along the I-5 transportation corridor. That route however, is not an option in the current NOP. We urge SANDAG staff and Board to reconsider this option during the EIR process.

Further, digging a tunnel that is so close to the ocean is quite short sighted, especially considering the rate of change and uncertainty being exasperated by the current US administration relative to climate change and ocean rise. By the time that tunnel is complete, who knows how much worse our environmental situation will be related to sea level rise, crumbling bluffs and loss of beach, among other things? There has been lots of discussion in CA about "managed retreat" as a necessary action. We don't see how building a tunnel that close to the ocean can be consistent with those considerations. Such an option just kicks the can down the road again and exaggerates the original short sighted decision to build a track on the bluffs.

Thank you for your time and we hope that each of you will be good stewards of the environment as well as the funding. Putting so much money towards doubling down on a bad decision, doesn't save money and it ignores the preservation of our environment, which is priceless and irreplaceable.

Sincerely,

Jennifer Lonbom

Alan Lonbom

[redacted]

Del Mar, CA 92014

To: **SANDAG**

At: **LOSSANcorridor@SANDAG.org**

From: **DEL MAR WOODS HOMEOWNERS' ASSOCIATION**

Date: **June 29, 2025**

Re: **SDLRR PROJECT NOP**

Del Mar Woods Homeowners' Association Comments on Notice of Preparation of Draft Environmental Impact Report on Track Relocation ("NOP").

Dear LOSSAN SANDAG PROJECT DEVELOPMENT TEAM:

The Del Mar Woods Homeowner's Association submits the following comments to the May 15, 2025, Notice of Preparation of the Draft Environmental Impact Report for the San Diego Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project) located in the cities of Del Mar, Solana Beach and San Diego, California ("NOP").

I. INTRODUCTION

Thank you for the opportunity to comment on the updated NOP for the relocation of the train tracks off the crumbling bluffs of Del Mar. This comment is submitted on behalf of the 126 families and other owner-members of Del Mar Woods Homeowners Association ("DMW"), whose physical address is 265 Stratford Court Del Mar and whose mailing address is c/o Ron Lopezi, Menas HOA Management at 7592 Metropolitan Drive Suite 401 San Diego, CA 92108. DMW reserves the right to comment further on any revised NOP, draft EIR or EIS or final EIR or EIS. DMW thanks members of the SANDAG project team for the recent outreach at the Fairgrounds and for being responsive to questions sent via e-mail to the project team by Karen Lare, the President of its HOA. We refer in our letter to the proposed routes as outlined on the included amended NOP diagram which includes both the Northern Yellow Line Route as well as the South Yellow Line Route.

Del Mar Woods Condominium Community Location

DMW is a 126-unit condominium and townhome community located in the southwest corner of Del Mar, CA. Approximately 60 condominium homes are located between the southmost portion of Camino Del Mar, in Del Mar, looking west, and the southmost portion of Stratford Court in Del Mar, and approximately 60 units are located between the southmost portion of Stratford Court and the Del Mar Bluffs where the trains currently operate. To the direct north of the DMW HOA complex is the multi-family apartment complex of Los Arboles consisting of 97 rental housing units. East of DMW are homes along the east side of Camino Del Mar. South of DMW are more homes and a quiet reserved wooded area owned by Torrey Pacific Corporation. As a result of the multi-family housing in the southwest portion of Del Mar, the area is densely populated. The multi-family units were built in the 1970's and many of the residents therein are elderly but there are also families with young children.

Figure 3. Four Project Alternative Alignments

II. PRELIMINARY STATEMENT ON NOP OF May 15, 2025

In a review of the updated NOP, the HOA was disappointed to see that the placement of the portal areas were not changed significantly from the previous NOP, and in fact despite the extensive time spent on the value analysis study, the proposed routes did not change significantly either. Of the five routes listed only three routes would relocate the trains off the bluff (despite it being the stated objective of the $300M grant being used to do the current study, while the remaining two would have it remain on the bluffs, an idea that has been rejected by the California Coastal Commission multiple times and in fact, the need to relocate the train tracks off of the bluff was called out to SANDAG by the Coastal Commission in their approvals of both of the DMB #4 and DMB#5 bluff stabilization projects.

The NOP calls out the need to decrease travel time on the train trip from Oceanside to San Diego as one of the key objectives. The HOA has spent time studying all routes and finds that the damages and negative impacts caused to the Del Mar business owners, residents and visitors by the Purple, Blue, Yellow and Green Line Routes far outweigh any increase gained by these routes over the citizen proposed Northern Yellow Line Route. The use of eminent domain and the need to tear up the town for extended periods of

construction will create an adversarial relationship between SANDAG/NCTD/BNSF/Amtrak and the community of Del Mar which includes its annual visitors, residents, business owners and homeowners.

Members of the HOA Board have attended and spoken at several of the SANDAG Board meetings and were pleased that Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings, that he was "committed" to study the Northern Yellow Line route in the Environmental Impact Report even though it is shown only in the footnotes of the document, citing lack of sufficient time to develop the route as the reason that it was not a formal part of the recommended routes. We believe Mr. Orso will be true to his words and that in fact, this alternative route will be included as a route in the EIR study for final consideration. The HOA Board appreciates that Mr. Orso has taken the time, along with his team, to listen to the community and that the senior team seems to understand the impact the community will feel with any of the other four routes (omitting the no build route).

Specific to Del Mar Woods HOA, the path of the Purple Line Route along Camino Del Mar does not truly follow Camino Del Mar and in fact takes a turn as it approaches 4th street and goes directly under Los Arboles, a four-story apartment building, home to people of all ages and income levels, and under the two-story and three-story buildings of Del Mar Woods. The NOP shows that the train route then goes under the homes to the south of Del Mar Woods and out of a portal a few hundred meters beyond the property. The train depth under Del Mar Woods is shallow given the potential risks of train derailment and subsequent explosion from the flammable materials transported on the freight and military cars.

III. COMMENTS ON THE SOUTH PORTALS

In our review of the documents provided, there is still insufficient information in the NOP to comment **fully** on the Portal Options (or on the NOP Route Options). For example, as to portals, while there is additional information and maps, the NOP lacks critical information on the exact path of the route regarding specific location, width, height of portal, or the width, depth underground and height of the tunnel, the size and location of ventilators, the location, acreage, size of ventilation related buildings referenced in SANDAG's 2023 Tunnel Analysis Report ("2023 SANDAG Report"), noise and vibration levels of construction and operation of the trains, staging area of construction or duration of construction. **Nonetheless, there is sufficient information for DMW to make initial comments.**

The South Portal Options are as follows:

Two south portal locations have been identified depending on the track alignment. The portal locations are as follows:

Torrey Pines Road Portal

This proposed portal would be located near the intersection of Carmel Valley Road and North Torrey Pines Road. The portal infrastructure would cross underneath Carmel Valley Road and potentially extend into residential and commercial properties in Del Mar.

DMW strongly objects to the "Torrey Pines Road" south portal option. The Torrey Pines Road portal option would be located near the intersection of Carmel Valley Road and Torrey Pines Road, which is at the

southern tip of Camino Del Mar and only a few hundred meters from Del Mar Woods and many other homes and businesses. A Project Objective is to **"Minimize impacts in the surrounding communities during and after construction."** This objective is of particular importance to Del Mar residents in light of the fact that while all of San Diego is said to benefit from the rail line, it is the Community of Del Mar that is being compelled to disproportionately, and almost exclusively, shoulder the burden of the realignment. The very least that SANDAG can do is to select or create portals and a route that minimizes the negative impacts to Del Mar and its residents.

Other cities benefit from rail service, but no other city is affected by the choice of the realignment route and the portals as is Del Mar (the City of San Diego would be slightly impacted by the alternate choice of the I-5 Knoll option). The selection of the Torrey Pines Road Portal would maximize negative impact to our community. Some of the reasons, among others are:

- The portion of the Del Mar community that is very close to the Torrey Pines Road portal option is densely populated. It includes the 126-condominiums of DMW, the 97 apartments of Los Arboles, and numerous single-family homes close to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA (p.9 of the NOP):
    - Air Quality will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of fumes and pollution from diesel output and other concentrated Greenhouse Gas Emissions spewed from the ventilation systems close to their homes.
    - Virtually continuous Noise of the ventilation systems and both Noise and Vibration of continuous freight and passenger trains descending and traveling right under their homes.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Continuous **Noise** of trains entering and exiting the portal.
    - Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[1]
    - The risks of carrying **Hazardous Waste** under their homes.

[1] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

    - The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
- In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    - The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to Torrey Pines State Beach.
    - Elimination of pedestrian and bicycle paths during construction.
    - The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    - Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    - The delivery of **Emergency Public Services** will be impeded or blocked.
    - Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    - All of the detriments to Del Mar's residents discussed above.
    - The loss of additional square meters of environmentally sensitive lagoon acreage with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon.

I-5 Knoll Portal

In contrast, the construction of the alternate I-5 Knoll portal would have none of the above effects. Thus, of the few study options for the South Portal offered by SANDAG in the NOP, **the I-5 Knoll is by far the better alternative with the lesser negative impacts to the community.**

IV. COMMENTS ON THE NORTH PORTAL OPTIONS

The North Portal options in the updated NOP are as follows:

Under Jimmy Durante Boulevard Portal

This proposed portal would be located north of the intersection of Camino Del Mar and Jimmy Durante Boulevard. The portal's infrastructure would cross underneath Jimmy Durante Boulevard, which would be raised. **The portal structures would potentially extend into commercial and residential properties in Del Mar.**

I-5 Racetrack View Portal

This proposed portal would be west of the I-5 Freeway close to homes located south of the fairgrounds along Racetrack View Drive. The route would be elevated along the protected San Dieguito Lagoon right along the nesting area for the Western Snowy Plover and other native species (some endangered) which was built at great expense with the restoration of the Lagoon. This route will cause issues for wildlife and untold issues for the thirty plus homes close to that portal.

The Jimmy Durante Boulevard option ("JDB") is unacceptable. **The portal construction and operation would inflict the maximum negative impact on Del Mar, its businesses and residents**. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is not "potential," it is certain. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.

The Racetrack View Portal Option is a challenge in many ways as noted above. It is located very close to the San Dieguito Lagoon, a protected wetlands, that underwent a major restoration that began in 2006 and Phase II was recently completed in 2024. This location will dramatically impact both homes and the lagoon. While it is going to move the construction further from the City center there is no entrance to this route without going through the main intersection that supports all traffic for the racetrack and fairgrounds in and out of Del Mar. This impact will be felt by both residents and visitors, and it will dramatically impact evacuation routes with heavy equipment and trucks.

V. DEL MAR WOODS' COMMENTS ON THE NOP STUDY ROUTES

Purple Line, Blue Line and South Yellow Line Routes

For many of the same reasons Del Mar Woods Homeowners' Association objects to the Torrey Pines Rd. south portal, it objects to the Purple, Blue, and South Yellow Routes.

- Regarding the Purple Line Route, which tunnels under Camino Del Mar, the amount of disruption and destruction to Del Mar businesses in the construction process would be continuous and extreme. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city. A double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on residents' homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.

    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Accelerated bluff erosion as the vibrations from the tunnel through the sandstone will cause additional cracks in the earth allowing water penetration and erosion to occur.
- Regarding the Blue Line Route, a portal right into people's homes and at an elevation to allow noise to carry across the entire area will cause irreparable harm to many. The double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of the portal and over the tunnel will be:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to and under their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.
    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.

Green Line Route

The addition of a double-tracked bluff route was not a welcome addition to the updated NOP in our view. We understand and appreciate the staff's desire to include a non-tunnel option however it does not pass even a rudimentary feasibility test.

The purpose of the study of the proposed routes is to move the tracks off the crumbling sandstone bluff not to study ways to add additional tracks to a fragile environment. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double- track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the bluffs and beach at the expense of the public. The

almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed the California coast for 50 years. According to SANDAG, double tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:" According to the Coastal Commission "If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law does not preempt state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023.

This option also requires the use of eminent domain to take private property so that the eroded thin crumbling bluffs can be expanded to the east.

Northern Yellow Line Route

The Northern Yellow Line Route is the only one that utilizes the non-populated areas of this beachside community and public lands. It allows the route to be built with the lowest impact on residents and the least impact on businesses. It would allow businesses to remain open during construction and limits the impacts to private homes by routing the train along public lands where gaining the necessary right of way would be much simpler and less expensive.

With consideration given to maintaining the horse racing and fair schedules and to strategically planning how to do the construction staging in such ways as to minimize impact to fairground operations, this route is far superior to any of the other routes in the NOP. The impact on residents in Del Mar and San Diego would be far less and it would also limit the traffic flow disruptions for residents of all of the beach communities who use the routes through Del Mar for commuting to work or school or for access to restaurants and businesses.

This route would also dramatically limit the number of lawsuits that SANDAG and NCTD will face over eminent domain and the purchasing of land access rights and would head off the foreseeable class action suits that will be brought to compensate for generations of adverse health effects if any of the other routes are selected.

In short it has the following advantages:

1. No negative impact on ANY homes or businesses.
2. Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.
3. Places no air-polluting portals near homes, near the coast or near the Fairgrounds.
4. Bores no tunnels under or near homes.
5. Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an
   easement for which compensation can be paid to the Fairgrounds without displacing families.
6. No negative impact on the City of Solana Beach.
7. Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.
8. Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.
9. Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.
10. It is expected to cost considerably less than other routes that require tunneling right under homes and eminent domain of homes and businesses.
11. Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delays.

IV. COMMENTS ON SANDAG'S RESPONSIBILITY TO DO A "NO PROJECT" ANALYSIS AND TO HAVE A COST/BENEFIT ANALYSIS PREPARED.

As part of its draft EIR, SANDAG must do a "no project" analysis. In addition, the SANDAG Board, in fulfillment of its duty of reasonable business prudence, must have an independent cost/benefit analysis prepared.

"No Project"

CEQA requires SANDAG engineers to do a "no project" analysis as an alternative. In this case, since continuing bluff instability mandates that the trains must stop operating on the bluffs, removing the tracks must proceed. If, however, after SANDAG does a cost/benefit analysis, it is determined to move forward with relocating the tracks as opposed to finding 21st Century ways to move freight and people, then the "no project" analysis really means "not this project" and would require SANDAG engineers to go back to the drawing boards.

The inescapable fact is that implementing either the Purple Line Route, Blue Line Route, South Yellow Line Route or Double Track Green Route together with the Torrey Pines Road south portal and the JDB portal or Racetrack View Portal, would destroy Del Mar, its culture, property values and economy, and is too high a price to pay in pursuit of a form of transportation that does not fit the needs of the area. **The Northern Yellow Line Route** is the only current study route that circumvents homes and businesses and does not require the use of eminent domain at least affords Del Mar a path to survive the assault of realignment, **is the only acceptable alternative.**

V. Issues Specific to Del Mar Woods

These issues for Del Mar Woods remain the same as in our earlier comment letter on the previous NOP because the most impactful route was not significantly changed. The route chosen to study (Purple Line Route) still does not make the turn to follow Camino Del Mar but instead goes directly under part of the HOA. As a 126-unit condominium and townhouse complex built in the early 1970's, Del Mar Woods was not built to withstand the types of vibrations and shaking that will come with a loaded freight train or military transport train rumbling underneath it. With the location of the complex so close to the portal for the Purple Line Route, the depth of the tunnel underneath the complex will hardly be deep enough to protect the homes and their walls and foundations from damage. As we understand from discussions with your team, the portal openings must start high enough to account for sea level rise and can only proceed down at the maximum 2% grade. Your updated NOP documents show a depth of around 100 to 120 feet below the buildings. A quick investigation says that sandstone will allow vibrations to reach these buildings on a normal day, and any type of explosion would be catastrophic.

The buildings it will go under (as shown in the updated NOP maps) are three story buildings housing families and many older residents. The path also goes under the underground car park.

While these buildings have been retrofitted recently (2018) as per California code, that code did not contemplate loaded rail cars travelling under the three-story buildings or cement underground garages. Consideration must be given to the route plan impacting this large condominium complex and your engineers must take into consideration the building materials and techniques used at that time they were built. Stresses on buildings from vibration and the human health impacts are very real.

We have requested that your project team study the soil in this specific area as part of its geological work.

Del Mar Woods objects to selection of the Purple Line Route and urges the project team to consider the impact on not only the train (speed, duration of tunnel, costs, etc.) but the impact on the quality of life for residents and the structural impacts to real property and the impact on the price of many of the owner's largest (or only) asset.

VI. Additions needed to the NOP

- Vibrational impact studies specific to the materials used in 1970 construction of homes and garages. Specifically pertaining to three story buildings and underground parking.

- Circulation during construction for densely populated areas with limited ingress and egress options both for emergency services as well as daily access
- Impacts on housing prices before, during and after construction
- Funding of a separate account to pay for on-going damage (if the Purple Route is selected) for repairs to cracked foundations and underground cement parking garages due to shaking and vibrations
- Worst case scenarios from an explosive incident in a shallow tunnel under a three-story building
- Studies of potential health risks as noted earlier in this letter
- Study of an alternative route that directly follows Camino Del Mar with its slight curves versus the straight-line route depicted today – a one second difference in time is worth preservation of homes and residents' health

Conclusion

The residents of Del Mar Woods are supportive of the work SANDAG is doing to move the railroad tracks off the eroding sandstone bluffs but it believes that SANDAG has in its current NOP only one realistic alternative which will serve the purpose of track relocation and preserve the lives and the way of life for the Del Mar Woods owners and residents. **This is the Northern Yellow Line Route.**

Many comments have been made in SANDAG meetings urging the Board to take a longer view and find a long-term solution to move the tracks not only off the Del Mar Bluffs but out of all of the densely populated coastal towns and put them along the I-5 transportation corridor. That route however, is not an option in the current NOP. We urge SANDAG staff and Board to reconsider this option during the EIR process.

Thank you for your consideration.

Very truly yours,

Karen Lare

President, Del Mar Woods Homeowners Association, Del Mar, California.

Respond to: Karen.Lare@Yahoo.com

Cc: Del Mar Woods Board of Directors

Office of U.S. Congressman Mike Levin

Office of Senator Catherine Blakespear

California Coastal Commission: Attention Dr. Katherine Hucklebridge

Del Mar City Council

From: Dan Louis [redacted]
Sent: Wednesday, May 28, 2025 5:43 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: LOSSAN Rail Realignment - Proposed Project Alternative Alignments

It is great to see the new alternative to double-track this vital rail line in its current location, which is by far the most expedient and cost-efficient solution. There has been a small (and growing) group of us that have been promoting this concept since 2022, including presenting to SANDAG at various meetings and via conf. call on 4/17/24. **The "Double Track Reinforced Alternative Alignment" is clearly the best solution**, and I hope that SANDAG and all the stakeholders give it due consideration. All the other NEW rail alignments are considerably more expensive and disruptive to the communities, and it seems that the only reason that they are being developed is to try to placate the California Coastal Commission. Don't do it. Keep the rail line where it is and armor the slopes and augment the beaches, which benefits everyone and preserves a spectacular railway. And please remember that the bluffs need to be protected no matter what, so it does not make sense to spend all the money to move the railway and then ALSO spend all the money needed to protect the bluffs!

I wrote to SANDAG, NCTD, San Diego Union, etc. in July 2022 promoting essentially the same concept as the "Double Track Reinforced Alternative Alignment"; which is much faster than building a new alignment (particularly one involving tunnels), and can be done with minimal impact on the train service and the adjacent communities.

This would likely require two steps:

- **Permanently Protect the Bluffs**: Completely cover the bluffs with concrete. Probably 2-4 ft. thick* reinforced concrete would suffice. This prevents any further erosion – no more landslides. If there are concerns about the visual impacts of such a big concrete wall, then sculptured artistic concrete facing can be used, i.e. to match the existing visual aesthetic. Or a "living wall" could be built, which would require more maintenance but would be even better visually than the current bluffs.
- **Prevent further Beach Erosion**: Protect the wall/bluffs from the ocean (and potential sea level rise). This could be done with some form of a concrete seawall or rock revetment at the base of the new wall/bluff, but the better solution would be to construct groins along the beach, which would promote sand accumulations and extend the beach further seaward. The deeper beach provides more protection for bluffs and also provides for more beach enjoyment by the local communities. Think of the massive beaches at Santa Monica, Newport Beach, etc. The added beach also provides new protections against potential future sea level rise. The sand that would be "captured" with these groins is not at the expense of "downstream" communities, because most sand which traverses down the coastline is lost forever to the canyons off the coast. The groins merely retain the sand before it lost offshore.

* If Double-tracking the rail line is desired, then the wall could be thickened to provide more space at the top. This would be a bigger project, but still very doable and cost-effective. Even better, an end-to-end pedestrian/bike path could be built alongside the tracks to allow the local communities to enjoy the view of the beach and the ocean. Overhanging observation platforms could be incorporated into the new path.

BTW, one reason I've heard to detract from the "Double Track Reinforced Alternative Alignment" is risk of people trespassing on to the railway. But this is absurd. Any trespass risk can be solved with Fencing, just like most railroads throughout the world.

All of the above could be planned, designed and built for much less than the new rail alignments, without the need for any new real estate acquisitions. And some of that money has already been allocated for ongoing bluff repairs. The end product is much more useful to the local community. And it could also be built in a fraction of the time, probably in only 1-2 years (with perhaps more time needed for sand accumulations).

Of course, there is one serious problem with this plan – the California Coastal Commission (CCC), which may try to block it. Although the CCC should promote projects like this, which **provide for and benefit the enjoyment of the beaches and coastline by all California residents** (and improves tourism), they appear to have a pure "anti-development" and "environmental justice" agenda.

It should be noted that preserve this railway is essential for regional transportation (i.e. regional travel times, relieve traffic congestion, air quality, etc.), which benefits everyone and should also be a positive factor. It is regrettable that our California leadership has let the CCC become such a wildly ineffective and counter-productive bureaucracy. For the "Double Track Reinforced Alternative Alignment" to be acceptable to the CCC, direct involvement from the California Governor (or maybe the Federal Government) may be required. SANDAG, NCTD, the local cities, Amtrak, etc. may not have enough political sway to budge the CCC from their bankrupt policies.

Please don't be sucked into the CCC's "Managed Retreat" messaging, which advocates that we do nothing to protect our shoreline and we just let it succumb to Mother Nature. This messaging makes no sense. Should we stop repairing our roads, stop fixing our roofs, and just let nature take over? Of course not! We have been adapting and maintaining our built environment for centuries, and there is no engineering or technical reason why we cannot do the same thing with the current railway alignment, and do so at a fraction of the time and cost needed to build a new alignment.

Thank you.

Daniel Louis, PE

Sent from Outlook

Attachments: DL-SHL Community Letter to SANDAG.pdf

From: Doron Lurie [redacted]
Sent: Thursday, May 29, 2025 12:39:27 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: SANDAG Scoping Meeting For The Rail Realignment Project

Please see attached letter with comments on this topic.

Thanks for your attention.

Doron & Suzanne Lurie
[redacted]
[redacted], Del Mar CA 92014

May 28, 2025

SANDAG
1011 Union Street, Suite 400
San Diego, CA 92101
Attn: LOSSAN Comments
LOSSANcomments@sandag.org

To SANDAG:

Our name is Doron & Suzanne Lurie and we live on [redacted], Del Mar CA 92014. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3) Has no negative impact on the City of Solana Beach
4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6) Eliminates expensive tunnels under private property and below sea level
7) Assumes the Fairgrounds will have their special events platform as planned
8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

From: Kristin Schaeffer [redacted]
Sent: Monday, June 30, 2025 8:47:32 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Issues

Hi,

The Pink and Green Line routes raise significant environmental and community concerns. Neither option has local support, and both pose potential harm to sensitive ecosystems. In sharp contrast, the I-5 Knoll location for the southern portal has garnered broad support from both the environmental community and nearby residents. Continuing to evaluate the Pink and Green Lines would not only disregard public sentiment but also waste taxpayer resources. We respectfully urge you to eliminate these two routes from further review.

Thank you
Kristin Lynch

From: GD Macey [redacted]
Sent: Wednesday, June 25, 2025 5:24:03 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: San Diego LOSSAN Rail Realignment

-Dear Sirs,
I have studied the various proposals and find that it is most important to preserve the complete County Fairgrounds area, allowing uninterrupted use.

Thank you for allowing my comment.

G. Darrel Macey
[redacted]
Solana Beach, CA 92075

G. Darrel Macey

Please note my new Email address: [redacted]

Outlook

SDLRR Project NOP

From Whitney MacKenzie [redacted]
Date Fri 6/27/2025 10:11 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Whitney MacKenzie

From: Whitney MacKenzie [redacted]
Sent: Friday, June 27, 2025 5:11:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

As a former Del Mar resident and frequent beachgoer, I am writing to express my concern. This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option; the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you,

Whitney MacKenzie

From: Margaret Mahoney [redacted]
Sent: Monday, June 30, 2025 1:57:07 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: YELLOW LINE

Please add my name to the list of Del Mar residents asking that you give thought, attention and study for the Yellow Line alternative to other ideas that are being considered for the railroad going through Del Mar.
Thank you,

Margaret Mahoney
[redacted]
Del Mar, Ca 92014

From: L Mike Maier [redacted]
Sent: Saturday, June 21, 2025 12:44:26 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Del Mar Rail Realignment

As SANDAG moves forward with the LOSSAN Realignment Project, we acknowledge the train track will be moved to a safer location.

If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to interstate 5, keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for all San Diegans that the Northern Yellow Line BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight trains. As SANDAG is still evaluating alignments, it is imperative that the Northern Yellow Line alignment remains in consideration.

Thank you,
Mike Maier

Outlook

SDLRR Project NOP

From Victor Maisano [redacted]
Date Wed 6/25/2025 11:03 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Victor Maisano

From: Johanna Mall [redacted]
Sent: Tuesday, July 1, 2025 1:23:07 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

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Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea

level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Johanna Mall

From: Daniel Maneval [redacted]
Sent: Monday, June 30, 2025 2:31:10 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: LOSSAN Rail Alternatives NOP Response - Northern Yellow Line support

LOSSAN Committee,

I am a 32-year San Diego County resident and have lived in Del Mar for 11 years. The beauty of Del Mar is irrefutable and this town provides access to nature (e.g., Torrey Pines State Reserve) as well as entertainment (e.g., San Diego County Fair).

I realize there are numerous factors to consider in your decision to select among the options for the location of the rail tracks, and I thank you for your dedicated service and serious consideration of all comments.

I agree with many Del Mar residents that there are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. I strongly encourage you to remove the Pink Line and Green Line routes from further consideration.

The Northern Yellow Line approach will allow future generations to benefit from the coastal access that we all enjoy.

Thank you for your consideration.

Dan Maneval
[redacted]
Del Mar, CA 92014
[redacted]

From: Edna Chow Maneval [redacted]
Sent: Wednesday, June 25, 2025 3:05:26 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Del Mar train tunnel routes

Dear SANDAG,

I live in Del Mar and would like to enter my strong opposition to the Pink and Green Line routes. They are environmentally damaging and have no community support.

Please consider the I-5 Knoll location for the southern portal, which would have community support.

Thank you,
Edna Chow Maneval
[redacted]
Del Mar, CA 92014

From: Edna Chow Maneval [redacted]
Sent: Monday, June 30, 2025 3:52:37 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Please consider the Northern Yellow Line Option!!!

The Northern Yellow Line is the least impactful to our Community!!!

No Eminent Domain or Homes or Businesses

No Portals or Tunnels under Del Mar

Utilize Public Property

Provides the Fairgrounds their Free Event Platform

Moves the Rail over to the I-5 Transportation Corridor

No Pollution or Toxic Chemicals spewed into our Community

No Bored Tunnels under the Entire length of Del Mar

No Freight Trains under Del Mar

No Military Trains under Del Mar

No Noise and Vibration next to our homes

No Bored Tunnels in the fragile Torrey Sandstone under the full length of Del Mar

Thank you!

Edna Maneval
[redacted] Del Mar, CA 92014
[redacted]
[redacted]

Outlook

SDLRR Project NOP

From Edgar Ramirez [redacted]
Date Mon 6/30/2025 9:05 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Thank you,

Edgar Ramirez Manriquez

From: Arnold Markman [redacted]
Sent: Wednesday, May 28, 2025 7:28:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Rail alignment

As a 47 year resident of this area, it would be my opinion that the whole railroad alignment should be moved to the I 5 corridor. They already have right of way and it would move this busy, noisy system away from the towns along the coast.

From: Susan Maronde [redacted]
Sent: Monday, June 30, 2025 4:17:27 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Michael Maronde [redacted]
Subject: LOSSAN Rail Realignment Project

To whom it may concern,

As a very long time Del Mar resident and active community member, it breaks my heart to see how cavalier SANDAG has been to ignore the significant impacts of the potential decision regarding location of new tracks. We acknowledge that the train track needs to be moved to a safer location. But, if SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

Quite honestly, the prospect of a train running underneath our neighborhood is terrifying! The "what ifs" are SIGNIFICANT and potentially disastrous! Further, the impacts to the retail businesses would be devastating!

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment remains in consideration.

Sincerely appreciate the opportunity to comment.

Susan & Mike Maronde
[redacted]
Del Mar, CA 92014

Attachments: C_Marsh SANDBAG.docx (1).pdf

From: Carson Marsh [redacted]
Sent: Thursday, June 26, 2025 2:57:34 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Clerk of the Board <Clerkoftheboard@sandag.org>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; assemblymember.boerner@assembly.ca.gov <assemblymember.boerner@assembly.ca.gov>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; Gaasterland@gmail.com <Gaasterland@gmail.com>
Subject: Letter to SANDAG

Hello,

Please see my letter below as a resident of [redacted] Ocean View Avenue, Del Mar, CA.

Thanks!
Carson Marsh

Attn: Clerk of the Board

SANDAG

401 B Street, Suite 800

San Diego, CA 92101

June 26, 2025

Dear Honorable Members of the Board of SANDAG,

The Board's attention to the future of regional transportation is deeply appreciated.

After reviewing the current report and options, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment. The following points explain why this is the best option available.

With climate change, resilience over 100 years means avoiding sea-level threats—only the I-5 option provides that.

No modern planner would choose to bisect a sensitive area like the Los Penasquitos Lagoon.

The I-5 option also minimizes eminent domain and harm to Del Mar neighborhoods and businesses.

The western options all necessitate destructive new construction within protected habitat.

While no alignment is perfect, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, and least disruptive solution. Please act decisively to preserve our ecosystems, protect communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

Carson Marsh

[redacted] Ocean View, Del Mar, CA 92014

Attachments: Corinne Marsh SANDBAG Letter (1).docx

From: corinne marsh [redacted]
Sent: Saturday, June 28, 2025 6:25:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Clerk of the Board <Clerkoftheboard@sandag.org>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; assemblymember.boerner@assembly.ca.gov <assemblymember.boerner@assembly.ca.gov>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; Gaasterland@gmail.com <Gaasterland@gmail.com>
Subject: SANDBAG Letter for Proposal - Corinne Marsh [redacted] Ocean View Ave, Del Mar CA 92014

Hello,

Please see my letter below as a resident of [redacted] Ocean View Avenue, Del Mar, CA.

Thanks!
Corinne Marsh

Attn: Clerk of the Board

SANDAG

401 B Street, Suite 800

San Diego, CA 92101

June 28, 2025

Dear Honorable Members of the Board of SANDAG,

The Board's attention to the future of regional transportation is deeply appreciated by myself.

After reviewing the current report and options, I respectfully urge the Board to select the **San Dieguito Bridge to I-5 Alternative Alignment**. The following points explain why this is the best option available.

With climate change, resilience over 100 years means avoiding sea-level threats—only the I-5 option provides that. No modern planner would choose to bisect a sensitive area like the Los Penasquitos Lagoon. The I-5 option also minimizes eminent domain and harm to Del Mar neighborhoods and businesses. The western options all necessitate destructive new construction within protected habitat.

While no alignment is perfect, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, and least disruptive solution. Please act decisively to preserve our ecosystems, protect communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

Corinne Marsh

[redacted] Ocean View Avenue,

Del Mar CA 92014

Attachments: Kerry Marsh SandBag Letter.docx

From: Kerry Marsh [redacted]
Sent: Saturday, June 28, 2025 6:19:01 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Clerk of the Board <Clerkoftheboard@sandag.org>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; assemblymember.boerner@assembly.ca.gov <assemblymember.boerner@assembly.ca.gov>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; Gaasterland@gmail.com <Gaasterland@gmail.com>
Subject: SANDBAG Letter

Hello,

Please see my letter below as a resident of [redacted] Ocean View Avenue, Del Mar, CA. Thank you for your time and consideration.

Thanks!
Kerry Marsh
Resident of …
[redacted] Ocean View Avenue,
Del Mar, CA

Attn: Clerk of the Board
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

June 28, 2025

Dear Honorable Members of the Board of SANDAG,

I appreciate that the Board has invested in safeguarding the future of the rail corridor. Having reviewed the revised SANDAG report and recommendations, and having commented on the previous (and essentially identical) versions, I would like to take this time to comment on the ones currently under consideration. **The best option is San Dieguito Bridge to I-5 Alternative Alignment.** This is why …

First, imagine no rail line existed and SANDAG were charged with finding a route from Sorrento Valley to Solana Beach! It is almost impossible to imagine that a crossing of Los Penasquitos lagoon and Torrey Pines State Reserve would be considered. This highly sensitive and treasured habitat serves enormous environmental benefits, not least as a bastion of a rare and vanishing ecosystem, but also as a natural buffer against sea level rise. There is one option that offers the opportunity to undo the terrible wrong that was done in the original laying of these tracks, the I-5 Alternative Alignment. Removing the existing railroad berm and bridge is worth billions in environmental benefits.

Second, all three western routes will worsen the situation in the lagoon by destroying additional habitat for construction of new portals and additional berm and bridge.

Third, assuming the new rail line should last at least 100 years, the easternmost route offers the best protection against the sea level rise and the expected more frequent, severe storms, as well as the risk of tsunamis over that time.

Fourth, the I-5 Alternative Alignment will reduce the costs of taking valuable property from private landowners. The worst option (the alternate along Camino Del Mar) is likely to require hundreds of millions of dollars of remediation to homes and businesses along the route, to compensate for takings and damages. That degree of disruption would represent a huge and possibly fatal blow to the business district and neighborhoods of Del Mar.

The Board faces a choice among options, none of which is ideal. However, it is clear that one option is substantially better than the others: **the San Dieguito Bridge to I-5 Alternative Alignment.**

I strongly encourage the Board to choose this best option and get started on securing the future of the LOSSAN corridor for commuters, freight haulers, our national security and the benefit of San Diego County, the state of California, and the United States.

Thank you for your time and consideration….

Sincerely,

Kerry Marsh
[redacted] Ocean View Ave
Del Mar, CA 92014

Attachments: SANDBAG Board of Members Proposal_Michael Marsh.pdf

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From: Michael Marsh [redacted]
Sent: Thursday, June 26, 2025 11:38:29 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Clerk of the Board <Clerkoftheboard@sandag.org>; senator.blakespear@senate.ca.gov <senator.blakespear@senate.ca.gov>; assemblymember.boerner@assembly.ca.gov <assemblymember.boerner@assembly.ca.gov>; JoeLaCava@sandiego.gov <JoeLaCava@sandiego.gov>; Gaasterland@gmail.com <Gaasterland@gmail.com>
Subject: ATTN SANDBAG BOARD MEMBERS - Proposal Letter Attached

Dear SANDBAG Board Members,

My proposal letter is attached. As a resident of the Del Mar community, I believe this would pose an extreme inconvenience to the members of the beach community, state park, parking lots and beach. Further, it will destroy the beauty of the landscape for thousands of residents in the South Del Mar neighborhoods, and in the condominiums and townhomes across the state park.

Thank you for your consideration. I greatly hope you make the right decision.

Best regards,

Michael Marsh
[redacted] Ocean View Ave
Del Mar 92014

Attn: Clerk of the Board

SANDAG

401 B Street, Suite 800

San Diego, CA 92101

June 20, 2025

Dear Members of the Board of SANDAG,

Your thorough review of the relocation options reflects your commitment to our region.

After reviewing the current report and options, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment. The following points explain why this is the best option available.

Each western alternative requires harmful portal and berm construction within critical ecosystems.

Property takings along Camino Del Mar would be prohibitively expensive and destructive to the community.

Crossing a treasured area like the Los Penasquitos Lagoon today would be unthinkable.

Storms, tsunamis, and sea level rise make the inland route the safest long-term choice.

While no alignment is perfect, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, and least disruptive solution. Please act decisively to preserve our ecosystems, protect communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

Michael Marsh

[redacted] Ocean View Ave

Del Mar, CA 92014

From: Steve Maschue [redacted]
Sent: Tuesday, June 17, 2025 3:00:00 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>; LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: SDLRR Project NOP

From: Stephen G. Maschue [redacted]
Date: June 17, 2025
Dear LOSSAN Project Team,

I am a retired USAF Colonel, and engineer. As a long-time observer of regional infrastructure and beach preservation challenges, I appreciate the thought SANDAG has put into the Del Mar rail realignment options. Of the proposed alternatives, I believe **Alternative 4 (Bluff Alignment with Enhancements)** offers the most balanced solution in terms of cost, safety, and community value.

Here are several reasons I believe this option should remain under serious consideration—with a few recommended modifications:

1. Rail Easement Integrity:

The existing bluff corridor can be structurally stabilized with a combination of a base retaining wall and bluff-integrated supports. Geotechnical observations suggest a dense clay layer at the base of the sandstone bluffs, which can serve as a suitable foundation for such construction.

2. Hybrid Protection Strategy:

Pairing the retaining wall with a living shoreline would serve dual purposes: defending against ocean forces and providing habitat restoration. Native dune vegetation over buried stone would reduce wave energy, and integrated weep holes in the wall could support plant hydration and bluff drainage.

3. Coastal Access & Trail Integration:

Improving the corridor should also serve the public. Incorporating the Coastal Rail Trail and safe pedestrian routes along the corridor will boost community benefit and increase access without impacting rail operations.

4. Intersection Safety & Noise Mitigation:

The grade-level crossing at Coast Boulevard near Powerhouse Park is dangerous and disruptive. A trenched rail crossing here—placing double tracks below street level—would address both concerns.

5. Regional Precedents:

Carlsbad's successful seawall project between Tamarack and Pine shows this type of infrastructure can be effectively designed for long-term resilience, public use, and aesthetic integration.

6. Long-Term Sand Retention:

A jetty at the southern end of the corridor (near Peñasquitos Lagoon) could help mitigate sediment loss to the submarine canyon, contributing to broader regional shoreline health. Combined with a sand nourishment program, this creates a sustainable sediment management system.

Given the cost of tunneling, the extensive timeline, and uncertain geotechnical risks associated with Alternatives 1–3, it would be premature to eliminate the bluff route without full consideration of modern engineering possibilities.

Thank you for considering this feedback. I hope Alternative 4 remains a viable and improved option as planning moves forward.

Sincerely,

Stephen G. Maschue
Email: [redacted]

From: Susan Mazza & Arnie LaGuardia [redacted]
Sent: Friday, June 27, 2025 10:10:07 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train realignment

Hello,
We are longtime residents of the Carmel Valley West neighborhood. We are very concerned about the proposed Pink Line and Green Line routes for realigning the train tracks. Both routes are environmentally damaging to the fragile lagoon and have no community support. The I-5 Knoll location for the southern portal, by contrast, is strongly supported by both the environmental community and residents. Continuing to analyze the Pink Line and Green Line routes ignores the irreparable environmental harm and represents a misuse of our taxpayer funds.
For the above reasons, we urge you to remove the Pink Line and Green Line from further consideration.
Thank you,
Susan Mazza and Arnold LaGuardia
[redacted]

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

Sent from my iPad

Outlook

Train Realignment Concerns

From Kristin Schaeffer [redacted]
Date Mon 6/30/2025 1:46 PM
To LOSSAN Comments <lossancomments@sandag.org>

To whom it may concern,

The Pink and Green Line routes present serious concerns—they pose environmental risks and lack backing from the local community. In contrast, the I-5 Knoll site for the southern portal has received strong support from both environmental advocates and area residents. Allocating additional resources to study the Pink and Green Line options would be an irresponsible use of taxpayer dollars. For these reasons, we strongly recommend removing both routes from further consideration.

Thank you
Kayla McCalister

From: Sparrow McMorran [redacted]
Sent: Friday, June 27, 2025 7:50:58 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project

area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Sparrow McMorran

From: Taylor McPherson [redacted]
Sent: Wednesday, June 25, 2025 4:55:00 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

From: Samuel Mendez [redacted]
Sent: Tuesday, July 1, 2025 6:39:12 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Public Comment - LOSSAN Rail Realignment

To whom it may concern,

As a committed public transit user, environmental advocate, and rail enthusiast, I write in strong support of the Pacific Surfliner tunnel realignment project and specifically urge decision-makers to adopt the Crest Canyon alignment as the preferred route.

The Pacific Surfliner is one of the most important transportation links in Southern California. With rising sea levels and rapid coastal erosion threatening the current rail line through Del Mar, this project is not only necessary, it is urgent. The Crest Canyon alignment offers the best balance of speed, environmental stewardship, and long-term sustainability. It allows for train speeds up to 110 mph, improving service and cutting travel times. It also minimizes disruption to sensitive habitats when compared to the Camino Del Mar and I-15 alignments, which would impact the Los Peñasquitos and San Dieguito Lagoons respectively.

Additionally, it is critical that these tunnels be built with sufficient vertical clearance to accommodate future electrification, including overhead catenary infrastructure. According to SANDAG, electrification is key to reducing travel times between Oceanside and San Diego to just 30 minutes, a transformative improvement. Designing tunnels that preclude electrification would be short-sighted and incompatible with our state's clean transportation goals.

There is a mistaken belief, as implied by NCTD and echoed by some opponents, that overhead catenary and the California Coastal Commission's concerns about "aesthetic preservation" are inherently at odds. I respectfully disagree. Catenary systems are widely used around the world—even in coastal and scenic areas—and do not significantly detract from the natural environment. They are a practical and proven tool for modernizing our passenger rail system.

More importantly, electrification is also safer than the currently proposed future use of hydrogen-powered trains. While hydrogen propulsion is an intriguing idea, it remains largely unproven in real-world operations at the scale required here. Countries that have tested hydrogen trains have reported performance limitations and reliability issues. If NCTD

proceeds with this alternative, we the public must trust that they are investing billions in the necessary infrastructure to store, process, and handle hydrogen safely. This includes robust tunnel safety planning to address risks such as fire or explosion, risks that would be far less likely with a conventional electrified rail system.

Further, both the Pacific Surfliner and Coaster services envision a future schedule with up to four trains per hour per direction, a level of frequency that makes electrification not just viable, but economically sound. NCTD's apparent pivot toward hydrogen suggests a retreat from that vision of high-frequency service, which is the opposite of what Southern California needs to meet climate, congestion, and equity goals.

Finally, while the concerns of Del Mar residents should be heard, they must be weighed in proportion to the broader public interest. Del Mar has a population of roughly 4,000, while the Pacific Surfliner served approximately 2.8 million riders annually in 2018 and again in 2019 before the COVID-19 pandemic. We cannot allow a small municipality to hold the long-term interests of the region and millions of riders hostage.

This project is a rare opportunity to not only protect a vital rail corridor, but to build it smarter, greener, and more resilient. I strongly urge you to proceed with the Crest Canyon alignment, ensure that the design allows for overhead electrification, and remain focused on delivering safe, reliable, and high-frequency rail service for generations to come.

Sincerely,

Sam Mendez

Public Transit Advocate & Rail Enthusiast AND

PACIFIC SURFLINER RIDER

From: Dean Meredith [redacted]
Sent: Thursday, May 29, 2025 8:08:57 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: request to include a fifth route in the EIR

My name is Dean Meredith, and I have lived and worked in Del Mar for 40 years. I'm asking SANDAG to **please add the Northern Yellow Line (NYL) to the routes to be studied in the EIR process, as the CEO of SANDAG committed to doing at the February 28, 2025 SANDAG meeting.** This sensible route has been developed by citizens, academics, and businesses in the local communities to provide the government with the most safe and effective route to achieve SANDAG's goals to move the tracks off the bluff. This route enhances safety, and protects the community's homes and businesses from severe destruction and business failures which will cripple the city of Del Mar. It includes a modular bridge structure, which leaves the land below undisturbed and is extremely economical. With the agreement to lower speed on a curve, this route accomplishes SANDAG's goals and works with the new, planned Fairgrounds event platform.

The proposed Camino Del Mar, Crest Canyon, and the Bluffs routes all severely negatively impact the people and business of Del Mar and will destroy Del Mar's landscape, downtown businesses and quality of life for the 10 years of construction and forevermore. These three routes also have one located portal in the Jimmy Durante area leaves the city without the designated tsunami escape route.

The current routes that SANDAG has committed to studying do not accomplish their stated goals. If safety is a priority, then putting a tunnel under homes with freight trains carrying dangerous military equipment and spewing concentrated diesel fumes from portals into the community is dangerous and an environmental disaster. Homes would be taken with eminent domain, others near portals would be subject to exhaust and decreased property values. A tunnel under homes will cause noise and vibration that exceed allowable levels for over 2,000 homes according to SANDAG's own report. A separate vibration study done by SANDAG was flawed, and that is a known fact.

Double tracking on the bluff is a bad option as well. Bluffs erode over time. This is not a safe alternative for any train.

It is important that SANDAG study the NYL route, and choose a route that does not adversely affect the community. The Northern Yellow Line route must be part of the SANDAG's EIR process. The proposed Northern Yellow Line that SANDAG CEO says will be studied meets the criteria, supports the Fairgrounds and the community in the best way possible. I'm asking that this route be formally added to the EIR process.

Thank you.

--
Dean Meredith, A.I.A
A R C H I T E C T
California Lic # C 9359
Hawaii Lic # AR-16034-0
cell: 858.245.6892
fax: 858-755-9171
www.deanmeredithharchitecture.com

Attachments: May 29, SANDAG meeting.docx

From: Dean Meredith [redacted]
Sent: Thursday, June 5, 2025 4:47:48 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SANDAG meeting at the Sound

To Whom it May Concern:

On May 29, I attended the SANDAG meeting and spoke to the court reporter. Upon completion of my communication, I asked to see what she had written down. She showed me and I told her that was not what I had said. She said she would 'change it later'. I asked her to change it now, and she told me she wouldn't because there was a line of people behind me.

This is very concerning as my understanding is that court reporting is for verbatim communication.

I've attached exactly what I read to her.
Thank you for your attention to this important matter.

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Dean Meredith
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www.deanmeredithharchitecture.com

Dean Meredith

[redacted]

[redacted]

Del Mar, CA 92014

[redacted]

My name is Dean Meredith, and I have lived and worked in Del Mar for 40 years. I'm asking SANDAG to **please add the Northern Yellow Line (NYL) to the routes to be studied in the EIR process, as the CEO of SANDAG committed to doing at the February 28, 2025 SANDAG meeting.** This sensible route has been developed by citizens, academics, and businesses in the local communities to provide the government with the most safe and effective route to achieve SANDAG's goals to move the tracks off the bluff. This route enhances safety, and protects the community's homes and businesses from severe destruction and business failures which will cripple the city of Del Mar. It includes a modular bridge structure, which leaves the land below undisturbed and is extremely economical. With the agreement to lower speed on a curve, this route accomplishes SANDAG's goals and works with the new, planned Fairgrounds event platform.

The proposed Camino Del Mar, Crest Canyon, and the Bluffs routes all severely negatively impact the people and business of Del Mar and will destroy Del Mar's landscape, downtown businesses and quality of life for the 10 years of construction and forevermore. These three routes also have one located portal in the Jimmy Durante area leaves the city without the designated tsunami escape route.

The current routes that SANDAG has committed to studying do not accomplish their stated goals. If safety is a priority, then putting a tunnel under homes with freight trains carrying dangerous military equipment and spewing concentrated diesel fumes from portals into the community is dangerous and an environmental disaster. Homes would be taken with eminent domain, others near portals would be subject to exhaust and decreased property values. A tunnel under homes will cause noise and vibration that exceed allowable levels for over 2,000 homes according to SANDAG's own report. A separate vibration study done by SANDAG was flawed, and that is a known fact.

Double tracking on the bluff is a bad option as well. Bluffs erode over time. This is not a safe alternative for any train.

It is important that SANDAG study the NYL route, and choose a route that does not adversely affect the community. The Northern Yellow Line route must be part of the SANDAG's EIR process. The proposed Northern Yellow Line that SANDAG CEO says will be studied meets the criteria, supports the Fairgrounds and the community in the best way possible. I'm asking that this route be formally added to the EIR process.

Thank you.

Dean Meredith

Outlook

Rail alignment

From Neil Meyer [redacted]
Date Thu 6/19/2025 6:27 AM
To LOSSAN Comments <lossancomments@sandag.org>

Hi, I've looked at the VA study and the Crest Canyon Alternative Alignment makes the most sense. With this alignment you avoid the sever environmental impacts of building through the San Dieguito lagoon and wetlands area, which has been vastly improved in recent years due to millions of dollars of investments. Also, by removing the rail lines from the middle of the Penasquitos lagoon those old berms could be removed, greatly enhancing the tidal and high water flows. A win-win for both lagoons which have been degraded historically by reduced flows and increased sedimentation caused by
public infrastructure. This option also minimizes surface disruption and impacts to private property owners. Thank you, Neil Meyer
Sent from my iPad

From: Betsy Milich [redacted]
Sent: Monday, June 30, 2025 9:53:45 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: San Diego LOSSAN Realignment--Updated Notice of Preparation, May 2025

Date: June 27 , 2025
To: lossancomments@sandag.org
Subject: San Diego LOSSAN Realignment—UPDATED Notice of Preparation May 2025

To Whom it May Concern:

I am a long time resident of the City of Del Mar and live at [redacted] Seaview Avenue.This property has been in my family for over 65 years. It is in serious jeopardy of destructive impact both temporarily and long term due to the San Diego LOSSAN Realignment project (SD-LOSSAN)

According to your map the Crest Canyon alignment goes directly beneath my home. I've had an independent project engineer verify this to the best of his ability with the most current information available from SANDAG.

I am addressing my comments and questions to the decision makers who will select either an alignment or the "no project alternative". I'm keenly interested in SANDAG's priorities and the SANDAG team directing the consultants as they prepare two studies; the draft Environmental Impact Report (EIR) and the Environmental Impact Statement (EIS).

I ask that each of my comments be thoroughly reviewed, analyzed, and specifically addressed in the EIR and EIS. How will my home at [redacted] Seaview Avenue be impacted by the different alternatives? How will my neighbors' homes be impacted?

I expect that you will abide by both SANDAG's and the City of Del Mar's overarching guiding principles. The most important principle is to *avoid the taking of private homes*, including the taking of subsurface property rights which would result in a large swath of dramatically devalued property. The proposed double track railway creates the potential for long-term noise, vibration, safety, lot slippage, loss of air quality, and the destruction of a cherished historical coastal town. These are very real impacts to our homes, environment, lifestyle, tourism, income, and safety.

With the exception of the Northern Yellow Line (I-5 alignment) the favored alignments have already had a significantly negative impact on the value of my home. *Sadly, a taking has already occurred.* Thus alternatives that avoid the taking of property—both surface and subterranean—must be given the highest priority.

The public is being denied full transparency of the SD-LOSSAN project approval process. Have we seen a full list of all involved agencies? Has the approval process been fully disclosed to other agencies? Which agencies are currently involved and which ones will be in the future? To what extent have any of the current four alternatives, or other less impactful alternatives, been discussed with other agencies? Are the four current alternatives truly feasible in the view of the permitting agencies?

In terms of the Updated Notice of Preparation the following issues, questions, and concerns must be thoroughly analyzed and addressed in the draft EIR and EIS:

1. **Portals**

a. To what degree will the portal designs result in a taking of private property, surface, or subsurface either

directly or indirectly? Include changes the portals will require for local streets.

b. In cases of eminent domain how are property values determined? It is logical to assume that residents will never be able to replace their homes' location or view with a similar one. Del Mar properties are all one of a kind.
c. How do the portals affect and require changes (both vertical and horizontal) to local/regional streets such as Camino Del Mar and Jimmy Durante Blvd.? How do those changes create temporary or permanent impacts including but not limited to: 1) the taking of property and property rights, 2) view impacts, 3) noise impacts, 4) degradation of air quality impacting residents, businesses, and visitors? 5) and in a vulnerable fire prone area will there be adequate emergency evacuation routes for the city's population?
d. When will portal locations and required roadway modifications be clearly delineated through staking and story poles to ensure the public can see how their property and town will be impacted directly or indirectly?
e. How will portal locations and their construction affect traffic both short and long term? What is the duration of construction, related road closures, and detours. How might that construction affect accessibility to homes and local businesses? What is the economic impact of construction to local businesses?
f. Do restaurants, shops, hotels, services, office buildings, and other forms of commerce have the ability to survive such impacts?
g. What measures will be taken to prevent both unauthorized individuals as well as wildlife from entering portals and therefore tunnels? What about dog owners who venture in to find their beloved missing pets? How will permanent security be established at the portals and tunnels? Will it be more dangerous to live near a portal?
h. What are the health risks of living near a portal?
i. What are the noise impacts of living near a portal?
j. How and where are the portals vented? How will that affect the public and nearby residents?

2. **Tunnels**

a. How is the property value impact of tunnels determined; is it based on depth below a home or distance horizontally from a home? What other factors are considered? Please note that Del Mar's many hillside homes are built on fill lots. Years of vibration will cause slippage over time and may ultimately result in a building's condemnation. A tunnel below or adjacent to a home—no matter how deep—will impact its value. Those home values can shape the future and lifestyle of many older residents who are relying on their home as a primary source for retirement funds and/or their final place of retirement.
b. Tunnel impact analysis should include but may not be limited to noise, vibration, air quality, and ground surface changes.
c. Show empirical proof of freight train depth noise and vibration at regular intervals from a tunnel beneath homes and commercial buildings. Demonstrate using surface-to-tracks completed sites **currently in use**. What is the state of the art equipment and process for noise and vibration dampening?
d. How are the tunnels vented and how will that venting affect properties near the required equipment and openings? Analysis should include but may not be limited to air quality and noise.
e. Provide a detailed safety analysis addressing the risks associated with train travel beneath hundreds of

homes. What type of cargo is permitted and can that cargo increase hazards for those living above or near a tunnel? Will the military be transporting explosive materials or chemicals on freight trains? In the case of a catastrophic accident inside the tunnel what would happen to ground stability and those living above or near a tunnel? Enemy states have already proven they have the ability to hack into our transportation systems. Since the tracks will serve as a military corridor, *who will be held responsible* should a planned derailment be executed or explosives set off inside the tunnel? How do you value human life? Or is it not factored in at all?

3. **Train Technology**

a. How does the California State Rail Plan relate to this project?

b. How will train technology change and evolve in the next 10 years? 25 years? Will the proposed train tunnels become obsolete? Should an interim solution be used to save taxpayer funding? Knowing that the underground tunnel and frequent trains will have destructive environmental consequences, would it be wiser to wait for better technology resulting in cleaner and improved rail transportation?

These are just some initial questions on the Updated NOP, as I have additional questions and concerns. Who may I speak with in order to ensure that all of my concerns are addressed?

To state the obvious, a tunnel bored for a massive double track rail line running the entire length of residential Del Mar would be irreversible. It's not a question **if** the environment, town, and people will suffer but rather **to what degree** they will suffer. Truly, there are better solutions.

Thank you.

Betsy Milich
[redacted] Seaview Avenue
Del Mar, CA 92014

From: Mindy Miller [redacted]
Sent: Wednesday, June 25, 2025 10:28 AM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Strong Opposition to the Del Mar Double Track Reinforced Alternative

Subject: Strong Opposition to the Del Mar Double Track Reinforced Alternative

Dear [City Council Members / City Manager / Planning Department],

I am writing to express my strong opposition to the proposed Del Mar Double Track Reinforced Alternative. This project would have devastating and irreversible consequences for the bluffs and beaches that over a million people—including myself—cherish and visit every year.

It is clear that this option cannot be considered the least environmentally damaging alternative in the Draft EIR. The proposed trenching, bluff stabilization, and armoring would cause permanent harm across several critical areas, including Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. These impacts simply cannot be mitigated.

Furthermore, this proposal directly violates the California Coastal Act, specifically Section 30253(b), which requires new development to ensure stability and structural integrity without the use of protective devices that significantly alter natural landforms along bluffs and cliffs.

The idea of leaving the train on the bluff has already been thoroughly considered and ruled out multiple times over the past 15 years. It's time to officially eliminate this option and move forward with tunnel alternatives,

which are far more environmentally responsible. Tunnel solutions offer long-term protection for both the LOSSAN corridor and our treasured coastal environment.

Organizations like Surfrider, the California Coastal Commission, and California State Parks have already voiced strong opposition to this proposal for good reason—it would permanently damage Del Mar's iconic bluffs and beaches. I stand with them in urging the City to reject this plan. In the face of rising sea levels and increasing erosion, the only sustainable path forward is to relocate the train away from the bluffs to preserve both the shoreline and the rail corridor for future generations.

Thank you for your attention to this urgent matter.

Sincerely,

Mindy Miller

From: Susan Miller [redacted]
Sent: Wednesday, June 18, 2025 7:01:02 PM (UTC-08:00) Pacific Time (US & Canada)
To: LOSSANcorridor <lossancorridor@sandag.org>
Subject: Study the Northern Yellow Line

As SANDAG moves forward with the LOSSAN Realignment Project, we acknowledge the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to Interstate 5, keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for all San Diegans that the Northern Yellow Line BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight trains. As SANDAG is still evaluating alignments, it is imperative that the Northern Yellow Line alignment remains in consideration.

Thank you,
Susan Miller

From: Sarah Millhoff [redacted]
Sent: Thursday, June 26, 2025 10:46:32 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Sarah Millhoff-White
San Diego District 9 Resident

Sent from my iPhone

From: Uriah Mirandon [redacted]
Sent: Thursday, June 26, 2025 8:49:34 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG, This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

Uriah Mirandon

Outlook

PLEASE REJECT: Del Mar Double Track Reinforced Alternative

From Mikayla Mitchell [redacted]
Date Wed 6/25/2025 11:18 AM
To LOSSAN Comments <lossancomments@sandag.org>; DelMarSLR@coastal.ca.gov <DelMarSLR@coastal.ca.gov>; council@delmar.ca.us <council@delmar.ca.us>

Hi!

I strongly oppose the proposed Del Mar Double Track Reinforced Alternative.

It is environmentally destructive, unlawful under the Coastal Act, and completely out of alignment with long-term climate resilience.

I'm a 3rd generation San Diegan. This plan would devastate the Del Mar bluffs and beaches, irreplaceable public resources that over a million people, including myself, rely on for recreation, beauty, and connection to nature.

The impacts to aesthetics, geology, land use, biological resources, and public access are irreversible and cannot be mitigated.

Building a trench and armoring the bluffs directly VIOLATES Coastal Act Section 30253(b), which prohibits development that relies on protective devices or alters natural landforms. This alone should disqualify the bluffside alternative from further consideration.

The environmentally superior option is clear: move the rail line off the bluffs and into a tunnel. Tunnel alternatives protect both the LOSSAN corridor and the fragile coastline from sea level rise, erosion, and collapse, all of which are accelerating.

Surfrider, the Coastal Commission, and California State Parks all OPPOSE the bluffside alternative for good reason. I stand with them in urging you to immediately remove this option from the EIR and move forward with tunnel-based solutions.

Thank you,
Mikayla Mitchell

From: Dan Mitrovich [redacted]
Sent: Saturday, June 28, 2025 7:19:39 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: San Diego LOSSAN Rail Realignment Project

As concerned residents in the Del Mar Terrace neighborhood, we are writing to express our strong opposition to the continued analysis of the Pink Line and Green Line routes for the rail realignment project. These routes pose significant environmental risks and lack support from the local community.

In contrast, the I-5 Knoll location for the southern portal has received strong support from both environmental groups and residents. It represents a far more responsible and community-backed solution.

Continuing to spend public funds on evaluating the Pink and Green Line routes—despite widespread opposition—constitutes a misuse of taxpayer resources. We respectfully urge you to remove these routes from further consideration and focus resources on the I-5 Knoll alternative.

Thank you for your attention to this important matter.

Dan and Jan Mitrovich

From: Vanessa Moeder [redacted]
Sent: Wednesday, June 25, 2025 5:18:11 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. To me, the Del Mar bluffs and beach area are the most beautiful place in the world, and they are a key reason I still live here and have visitors every year.

I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. *We cannot* destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources and, truly, national treasures. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.
Vanessa Moeder
Proud San Diego Resident since 2000

From: Lori Moreno [redacted]
Sent: Wednesday, June 25, 2025 9:17:58 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Reroute the train tracks

Hello SANDAG:
I am requesting that you stop supporting th train along the Del Mar bluffs. I think it's past the time ton reroute the tracks. It may cost more now, but please don't spend our tax dollars on the bluffs that will never stop crumbling.
Regards, Lori Moreno Browne
Sent from my iPhone

From: Maidy Morhous [redacted]
Sent: Tuesday, July 1, 2025 11:20:26 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Pink Line green line routes

> **There are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration. Thank you.**

Maidy Morhous Sculptor
www.maidymorhous.com
[redacted]

From: Hiroshi McDonald [redacted]
Sent: Tuesday, July 8, 2025 2:32:07 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Torrey Pines

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Best regards,
Hiroshi McDonald Mori
Sea Point owner and resident since 2001

Yahoo Mail: Search, Organize, Conquer

From: Morris, Matt [redacted]
Sent: Monday, June 30, 2025 8:04:51 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Rail Alignment - Del Mar

Dear SANDAG;

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

Sincerely,

Matt Morris
[redacted]
Del Mar, CA 92014
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From: Mindy Morris [redacted]
Sent: Tuesday, July 1, 2025 3:00:11 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Pink Line and Green Line routes

Dear SANDAG;

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

Sincerely,

Mindy Morris
[redacted]
Del Mar, CA 92014

From: Jane Morton [redacted]
Sent: Monday, June 9, 2025 5:35:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Rail Alignment options

Gentlemen and Ladies,

Of the alignments suggested, I would choose the Yellow Line; either that proposed by Sandag or that proposed by the Del Mar Group.

The project that I would like least is the Do Nothing project. Though to many this is the best choice because it would happen fastest and be the least expensive, I am of the opinion that it is a horrible choice. It is the kind of public plan that once created and years down the road, people would be scratching their heads wondering why it was ever built. Admittedly it would be a wonderful scenic ride to take, but to build something that so invades beach space and is, by it's very location, a continually threatened situation, just makes no sense. It would be kicking the can down the road and in another 10- 20 years from completion, would be threatened by bluff collapse again. It is just nature, and on the sandy slopes, with an additional track being added, the threat would be doubled. These hillsides are not like others around the country, they are always in a state of threatened collapse. To add another set of tracks through there is insane. I understand that the existing tracks will remain for 25 or so years while a new track project is built, but still, I would rather see those bluffs supported for the time than to add anymore tracks than what is there. Consider that as expensive penance for having ignored the problem for so many years, when 20 years ago, it should have been considered an impending crisis. Twenty years ago, anyone with foresight could see that a new plan needed to be developed. Unfortunately some people take the stance that "crisis" is only valid when a bluff has collapsed. "Future crisis" should have been called all those years ago whenever there was crumbling.

Of the other choices, I prefer either the Yellow Line or the Yellow Line as redrawn by a Del Mar group. I know it will be the most expensive option, but is the better choice for the reason of less disruption to homes or taking of homes, less disruption to business in the other choices. Any business affected by the construction would likely be ruined just because of the length of time to build. If Covid disrupted business for such a long time, creative business owners were able to barely weather the storm. But there will be no weathering the storm with this project. People would be displaced from their homes with the other choices, and with the cost of housing in CA, would likely be unable to buy back into anything comparable.

The Yellow Line as created by the Del Mar Group seems better, as the access point/tunnel into Del Mar would be a better spot. But either of those Yellow Line Projects would be better than the 2 plans that affect Del Mar or Solana Beach and better for any number of reasons than the Do Nothing plan.

Jane Morton, Solana Beach

Virus-free.www.avast.com

From: Christina Mullarkey [redacted]
Sent: Sunday, June 29, 2025 8:47 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Train route feedback and don't support under crest canyon (jimmy Durante to 1-5 knoll) option

Dear SANDAG Team,

I am a resident of Del Mar and appreciate the extensive work being done to evaluate options for the realignment of the rail corridor. I fully support the need to protect our eroding bluffs and ensure the long-term safety and reliability of this critical transportation link.

However, I strongly oppose the "Under Crest Canyon" tunnel option, as it would run directly beneath my home and neighborhood, raising significant concerns about noise, vibration, long-term property impacts, and disruption to our community's peace and stability — both during construction and for decades to come.

I respectfully urge SANDAG to remove this option from consideration and instead prioritize alignments that minimize direct impact on established residential areas. Specifically, I support the following, in order of preference:

☐First Choice: The San Diego Bridge to I-5 alignment, which follows existing major transportation corridors and reduces impact on homes and sensitive canyon areas.

2. Second Choice: The Del Mar Bluffs double track with reinforced alignment, which addresses bluff stability while largely preserving the current corridor footprint.

3. Third Choice: The Under Camino Del Mar alignment, which I see as less impactful than the Crest Canyon tunnel option if a tunnel must be considered.

I truly appreciate your commitment to balancing rail safety, environmental protection, and the well-being of our community. Please give full weight to the concerns of residents whose homes and neighborhoods would be directly affected by these choices.

Thank you for your time, your careful consideration, and your service to our region.

Sincerely,

Christina Mullarkey

[redacted]

Del Mar CA 92014

[redacted]

From: David Mullarkey [redacted]
Sent: Sunday, June 29, 2025 8:44 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Strongly oppose the "Under Crest Canyon" tunnel option

Dear SANDAG Team,

I am a resident of Del Mar and appreciate the extensive work being done to evaluate options for the realignment of the rail corridor. I fully support the need to protect our eroding bluffs and ensure the long-term safety and reliability of this critical transportation link.

However, I strongly oppose the "Under Crest Canyon" tunnel option, as it would run directly beneath my home and neighborhood, raising significant concerns about noise, vibration, long-term property impacts, and disruption to our community's peace and stability — both during construction and for decades to come.

I respectfully urge SANDAG to remove this option from consideration and instead prioritize alignments that minimize direct impact on established residential areas. Specifically, I support the following, in order of preference:

1. First Choice: The San Diego Bridge to I-5 alignment, which follows existing major transportation corridors and reduces impact on homes and sensitive canyon areas.

2. Second Choice: The Del Mar Bluffs double track with reinforced alignment, which addresses bluff stability while largely preserving the current corridor footprint.

3. Third Choice: The Under Camino Del Mar alignment, which I see as less impactful than the Crest Canyon tunnel option if a tunnel must be considered.

I truly appreciate your commitment to balancing rail safety, environmental protection, and the well-being of our community. Please give full weight to the concerns of residents whose homes and neighborhoods would be directly affected by these choices.

Thank you for your time, your careful consideration, and your service to our region.

Sincerely,

David Mullarkey
[redacted]
Del Mar CA 92014
[redacted]
[redacted]

From: Jillian Mullarkey [redacted]
Sent: Sunday, June 29, 2025 8:47 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Train route feedback and don't support under crest canyon (jimmy Durante to 1-5 knoll) option

Dear SANDAG Team,

I am a resident of Del Mar and appreciate the extensive work being done to evaluate options for the realignment of the rail corridor. I fully support the need to protect our eroding bluffs and ensure the long-term safety and reliability of this critical transportation link.

However, I strongly oppose the "Under Crest Canyon" tunnel option, as it would run directly beneath my home and neighborhood, raising significant concerns about noise, vibration, long-term property impacts, and disruption to our community's peace and stability — both during construction and for decades to come.

I respectfully urge SANDAG to remove this option from consideration and instead prioritize alignments that minimize direct impact on established residential areas. Specifically, I support the following, in order of preference:

1. First Choice: The San Diego Bridge to I-5 alignment, which follows existing major transportation corridors and reduces impact on homes and sensitive canyon areas.

2. Second Choice: The Del Mar Bluffs double track with

reinforced alignment, which addresses bluff stability while largely preserving the current corridor footprint.

3. Third Choice: The Under Camino Del Mar alignment, which I see as less impactful than the Crest Canyon tunnel option if a tunnel must be considered.

I truly appreciate your commitment to balancing rail safety, environmental protection, and the well-being of our community. Please give full weight to the concerns of residents whose homes and neighborhoods would be directly affected by these choices.

Thank you for your time, your careful consideration, and your service to our region.

Sincerely,

Jillian Mullarkey

[redacted]

Del Mar CA 92014

[redacted]

From: Kim Mullarkey [redacted]
Sent: Sunday, June 29, 2025 8:36 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Train route feedback and don't support under crest canyon (jimmy Durante to 1-5 knoll) option

Dear SANDAG Team,

I am a resident of Del Mar and appreciate the extensive work being done to evaluate options for the realignment of the rail corridor. I fully support the need to protect our eroding bluffs and ensure the long-term safety and reliability of this critical transportation link.

However, I strongly oppose the "Under Crest Canyon" tunnel option, as it would run directly beneath my home and neighborhood, raising significant concerns about noise, vibration, long-term property impacts, and disruption to our community's peace and stability — both during construction and for decades to come.

I respectfully urge SANDAG to remove this option from consideration and instead prioritize alignments that minimize direct impact on established residential areas. Specifically, I support the following, in order of preference:

1. First Choice: The San Diego Bridge to I-5 alignment, which follows existing major transportation corridors and reduces impact on homes and sensitive canyon areas.

2. Second Choice: The Del Mar Bluffs double track with reinforced alignment, which addresses bluff stability while largely preserving the

current corridor footprint.

3. Third Choice: The Under Camino Del Mar alignment, which I see as less impactful than the Crest Canyon tunnel option if a tunnel must be considered.

I truly appreciate your commitment to balancing rail safety, environmental protection, and the well-being of our community. Please give full weight to the concerns of residents whose homes and neighborhoods would be directly affected by these choices.

Thank you for your time, your careful consideration, and your service to our region.

Sincerely,

Kimberly Mullarkey

[redacted]

Del Mar CA 92014

[redacted]

Sent from my iPhone

From: Judy Muller-Cohn [redacted]
Sent: Wednesday, May 28, 2025 5:15:22 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

My name is Judy Muller-Cohn and I live in Del Mar Terrace, San Diego. SANDAG needs to study a new rail route, the so called Northern Yellow Line, which meets the needs of Del Mar, Del Mar Terrace (SD), Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line" (NYL).

"Northern Yellow Line"

The NYL route (imaged above) is described briefly, going southward, as follows:

From the southern edge of the special events platform, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, taking advantage of the Easement that runs around the Fairgrounds, and taking into consideration the Living Levee that will be built along the edge of the river, rising in elevation until it reaches Jimmy Durante Blvd. It then crosses over Jimmy Durante Blvd on an elevated bridge which continues eastward across the southern edge of the Del Mar Golf Driving Range which is part of the State-owned Fairgrounds property (north of the San Dieguito Lagoon) until it heads south and crosses the lagoon just west of the I-5. The line would then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other three alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow route shown on the NOP would have severe adverse impacts

on 35-60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon Route and Camino Del Mar routes utilize a North Portal located at the intersection of Jimmy Durante and Camino Del Mar would require extensive eminent domain taking of approximately 35-50 homes and businesses, lower property values and livability for residents and stability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds. The South Portal for the Camino Del Mar Option at the southern end of Del Mar will also take homes by eminent domain and put a portal near homes and the tunnel under homes. The Camino Del Mar option will virtually cut off the access into and out of Del Mar North and South for over a decade. The Crest Canyon Route will virtually seal off the northern access into and out of Del Mar for over a decade as well. These routes impact the Evacuation route out of Del Mar, which utilizes Jimmy Durante. Double Tracking the fragile bluff is out of the question and against Coastal Commission rules. In fact, this route already went through an EIR and was strongly rejected due to environmental impact. Nothing has changed to the better since. To install 20 foot tall beach walls all along Del Mar's beaches will destroy the whole area and the beaches will disappear completely within 1-2 decades. Homes also will have to be taken between 14-9th street due to the required construction of a second rail east of the existing rail. The train is already pretty much going by right outside people's yards.

However, SANDAG Staff's recommendation to study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar, or any other community

2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon and avoids construction of a second set of rails on an additional berm right through the sensitive lagoon.

3) Has no negative impact on the City of Solana Beach

4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes

5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.

6) Eliminates expensive tunnels under private property and below sea level
7) Assumes the Fairgrounds will have their special events platform as planned
8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Sincerely,

Judy Muller-Cohn, Ph.D.

From: Craig Munro [redacted]
Sent: Tuesday, July 1, 2025 4:02:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Realignment - Double Tracking

SANDAG representatives:

I am writing to express the strongest possible opposition to the proposed double-tracked, high-speed train project, as described in the Pink Line and Green Line routes. As I understand it, this would include building a massive tunnel through Del Mar and double tracking the train line that goes through the Pensaquitos lagoon. These routes would create an eye sore throughout the community and generate noise and air pollution, the latter in the form of diesel fumes expelled from the trains exhaust fans. Residents and visitors would have to live with the ever-present risk of a catastrophic derailments, as we have seen occur in several other communities in the United States. The town of Del Mar and other beautiful coastal communities would be forever transformed from quiet and picturesque seaside villages into noisy smelly eyesores, with irreparable damage to the local economies and related tax bases, which benefit all Californians. Lastly, but by no means least, this would irreparably damage the lagoon and its ecosystem, which various species of birds and other wildlife reside in.

Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents.

As a California taxpayer, I believe continuing to analyze the Pink Line or Green Line routes is a misuse of taxpayer funds and as a California resident, find it hard to believe that SANDAG is seriously considering the Pink or Green Line alternatives when a far less damaging alternative exist. I urge you to remove the Pink and Green Line routes from further consideration.

Thank you

Craig Munro
Del Mar Resident

Outlook

Train relocation

From Barbara Myers [redacted]
Date Sun 6/29/2025 9:43 PM
To LOSSAN Comments <LOSSANcomments@sandag.org>

Dear Madam/Sir,

We are 40 year residents of Del Mar and are disappointed in the entire situation with the relocation of the train. It seems very disorganized and has pitted cities against cities and the amount of money spent on studies for a project 30 years from now seems so wasteful. The bluffs are natural environments and will continue to erode with or without the stabilization process and that is a frightening thought. Even more frightening is the possibility of tunnels under homes, especially with trains carrying toxic materials. The taking of homes under eminent domain seems extreme when there is a better solution to completely avoid doing so. It seems appropriate to move the train around the fairgrounds and use the 1-5 corridor where the entire coast community will not be disturbed and impacted as severely. Please use common sense in your thinking and planning for this very important decision.

Thank you for listening.
Barbara & Doug Myers
Sent from my iPhone

From: Rachel Myers [redacted]
Sent: Wednesday, June 25, 2025 4:59:51 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG, This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

From: Mika Nagamine [redacted]
Sent: Monday, June 30, 2025 4:56:46 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Comment on NOP

My major concerns are to complete the project as soon as possible, in a cost-effective way, while being environmentally safe, and minimally disruptive (ie, minimizes taking property by eminent domain).

I favor the route that tunnels under Camino Del Mar, because it is the least expensive of the 3 viable options (excluding keeping the tracks in the current location), and could be done in a phased manner, which would simplify funding and minimize LOSSAN service disruption.

Mika Nagamine

From: B Nagelberg [redacted]
Sent: Tuesday, July 1, 2025 12:47:32 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Yellow Line - my opinion

Hi,

My first choice for relocating the train is to move it along or under Route 5.

If there is no way to do this **further North of Del Mar**, then, my second choice is the Yellow line, based upon its lesser impact on the community.

Thanks,
Bette Nagelberg

From: John Nalevanko [redacted]
Sent: Wednesday, May 21, 2025 9:27:36 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Rail Alignment

Dear Sir or Madam at SanDag

I am an Architect by profession (although soon to retire), and have had my private practice
in Del Mar across the street from the Del Mar Civic Center since 1987.

When talk of this project began, it seemed obvious to me that the best solution for the alignment would be to tunnel under Camino Del Mar and pop out just beyond Carmel Valley as close to the Highway 101 as possible, feathering into the existing above ground track.

This is the shortest distance, saving $$, and it does not run underneath anyone homes, which I believe is not a concern anyway, and it would disturb the nature lagoons as little as possible, which I think is VERY important.

I understand you need to show other options to the generall public in order to settle on the best one, but in my opinion, the best alignment is obvious.

Good luck.
I look forward to the railroad track along the Del Mar cliff turned into a nice trail path :-)

John
John Nalevanko Architect
[redacted]
Del Mar California 92014-2652
[redacted]
[redacted]

From: Peter Nanawa [redacted]
Sent: Friday, June 27, 2025 4:17:47 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.
-Peter

From: Angelina Neglia [redacted]
Sent: Monday, June 30, 2025 4:24:28 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Boring Samples, locations and dates. "SDLRR Project NOP"

Angelina Neglia
Healthcare/Educational Advocate
[redacted]
CALTASH 2024 Recipient, Advocating for People with Disabilities
2024 Nominee, Senator Blakespear's "Women Who Inspire"

Hello to you all,

I know you are all busy, we are noticing your Yellow Signs going up around Del Mar stating Boring Samples will be taken, and the dates etc.

Our Coalition and residents are asking when you will be putting up boring sample signs for the Northern Yellow Line? As you committed to study the northern yellow line to the same depth as the other alignment routes in the EIR.

Could you please send me an updated map of boring locations/permit, showing all boring locations including the northern yellow line and dates as I am being bombarded by residents asking for this info. I appreciate it so much.

Thanks again,
Angie
Coalition for Safer Trains

Angelina Neglia

Healthcare/Educational Advocate

[redacted]

CALTASH 2024 Recipient, Advocating for People with Disabilities

2024 Nominee, Senator Blakespear's "Women Who Inspire"

Outlook

SDLRR Project NOP

From cindy & kevin [redacted]
Date Wed 6/25/2025 4:14 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

Thank you,

Cindy Nelson

From: Neuman, Tom [redacted]
Sent: Wednesday, June 25, 2025 9:00 AM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: LOSSAN Corrider

Although there are a myriad of reasons to support the Northern Yellow Route for the realignment of the LOSSAN Corridor (no negative impact on homes or houses in Del Mar, preservation of the San Diego Lagoon, no portals near homes, routing through state owned property, no impact on Solana Beach, lower overall expense, and the safety of Del Mar residents going into the future, etc), I will focus on only one of the above reasons and that is safety.

It is the primary responsibility of government to ensure the safety of its constituents. Of all of the possible realignment routes it is the Northern Yellow Route that provides the greatest degree os safety to the local residents during and after construction of the realigned rail tracks. It is hubris to believe that in the future, derailments will not occur and having the rail corridor as far as possible from the heavily populated areas of Del Mar is clearly the safest way to proceed. Considering the cargo that will go over these rails, it would be unconscionable to run trains with potentially dangerous cargo through and under heavily populated areas. It is also foolish to believe there will be no major construction accidents. Have any of the members of SANDAG ever actually seen a boring machine? It clearly would be best to keep such an immense matching away from the citizens in proximity to this immense construction project.

I strongly urge the members of SANDAG to sect the Northern Yellow Route as the best alternative for realignment of the current railroad tracks.

Tom Neuman, MD, FACP, FACPM, FUHM
Emeritus Professor of Medicine
UCSD School of Medicine

From: [redacted]
Sent: Friday, June 27, 2025 5:26:13 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Teak Nichols

From: Daryl Nickel [redacted]
Sent: Sunday, June 29, 2025 10:15:52 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: train realignment

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you. Daryl Nickel, Sea Village owner, [redacted].

From: sdnickel@aol.com [redacted]
Sent: Saturday, June 28, 2025 9:09:03 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Realignment

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse or taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.
Sondra Nickel, [redacted]. (Sea Village owner).

From: Sasha Nikolich [redacted]
Sent: Friday, June 27, 2025 5:15:24 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

From: Marybeth Norgren [redacted]
Sent: Tuesday, July 1, 2025 6:29:14 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>; Per Cederstav [redacted]
Subject: Comments for Consideration regarding NOP of the Draft EIR for the LOSSAN Rail Realignment

We are submitting comments for consideration regarding Notice of Preparation of the Draft Environmental Impact Report for the four proposed routes (plus an alternate route suggested by a group of Del Mar residents). These comments are not listed in order of importance:

- What will be the impact of trains through the San Dieguito lagoon? Restoration work of the lagoon has been underway for decades. Restoration of the lagoon is already serving as mitigation for work at San Onofre Nuclear Power Plant. Preferred project alternatives will need to consider how to mitigate an area which is only in the middle of a decades-long restoration process.
- The San Dieguito River Valley Coast to Crest trail plans to use the open space easement along the west edge of the fairgrounds to complete its "Reach the Beach" section of the trail, as shown by the orange dots in the image below. Should the preferred project alternative be to allow a train track on that fairground easement, the EIR needs to include mitigation for the lost use of the fairgrounds easement that is expected to serve as a vital piece of the Coast to Crest trail. The mitigation needs to provide an alternate trail.

- What are the impacts of double-tracking the bluff? In addition to improving the speed of the train, a significant purpose of this project was to get the tracks off the eroding bluff. Neither of those objectives are met with this alternative. The EIR needs to address the physical degradation of the bluffs caused by the reinforcement process. Further, the loss of the natural process of bluff degradation that contributes to the quality of the sand needs to be understood.
- Future electrification of the track should be considered in the design of the preferred alternative. If there are impacts due to electrification, they should be considered in the EIR.
- We fully support tunneling to the maximum extent possible. Not only is it a well-proven solution for running tracks through a populated area, but tunneling also conceals the negative visual impact that running the train through sensitive habitats and recreational areas would have. We look forward to the impacts of tunneling being thoroughly studied in the EIR.

Sincerely,

Marybeth Norgren and Per M. Cederstav
[redacted], Del Mar, CA 92014
[redacted] (mobile)

From: elizabeth north [redacted]
Sent: Wednesday, June 25, 2025 6:01:03 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

~Elizabeth North

From: Brenna Ogg [redacted]
Sent: Thursday, June 26, 2025 9:20:26 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative is short-sighted, unmitigable, and extremely disappointing. I support your efforts to relocate the train away from the failing bluffs and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7-mile stretch. This would destroy what remains of our natural bluffs. Armoring this entire stretch with seawalls would bring about the permanent loss of the beach, because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss.

Simply put, there is no viable mitigation for destroying our bluffs and beaches, because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term and creates additional problems to mitigate including plugging up our nearby lagoons. Furthermore, the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act. Therefore, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option. The tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you,
Brenna Ogg

From: Sarah Ogle [redacted]
Sent: Tuesday, July 1, 2025 4:20:10 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Public comment on rail realignment: support Camino Del Mar alternative and electric trains

Dear SANDAG,

Thank you for all you do for San Diego transit. I grew up never using transit (in Point Loma), and now I use the trolley and buses frequently (in UTC). It has greatly increased my quality of life to use the trolley for Padres games/downtown events along with using the bus to get to work.

I strongly support the alternative under Camino Del Mar road. Having a double track is really exciting. I also strongly support digging the tunnel wide enough for electrifying the train. Electrifying the train would increase speed, decrease noise, decrease pollution, and decrease greenhouse gas emissions.

I recently rode on Caltrain's new electric trains in San Francisco, and they were amazing! Super fast and ridership has increased there.

Thank you for your consideration of working to implement the Camino Del Mar alternative and electric trains!

Best,

Sarah Ogle
Climate Sciences PhD Candidate at UCSD

From: Judith Olson [redacted]
Sent: Friday, June 13, 2025 6:52:51 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: SDLRR Project NOP

To SANDAG:

My name is Judith Olson and I live in Del Mar, CA. I am requesting that SANDAG study a new rail route that meets the needs of Del Mar, Solana Beach, and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

Sandag has indicated that four routes are to be studied. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, Sandag has added one possible fifth alternative that is a more northerly design concept of the San Dieguito to I5 which residents are calling " the Northern Yellow LIne."

I am writing in support of this fifth alternative route, "The Northern Yellow Line" and hope that Sandag will further explore this alternative and consider it for adoption.

Thank you for your consideration of my request.

From: IOna [redacted]
Sent: Thursday, June 26, 2025 7:54:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Irene Ona, SD resident

Outlook

SDLRR Project NOP

From Kathryn [redacted]
Date Fri 6/27/2025 3:49 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Kind regards,
Kathryn O'Neill

From: Karen Roan [redacted]
Sent: Sunday, June 29, 2025 5:57:41 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Feedback - LOSSAN Rail Alignment Project

Dear SANDAG:

I am a resident of Del Mar Heights and am writing to give my feedback on the proposed project alternative alignments (LOSSAN Rail Realignment) subsequent to the updated NOP released on 5/16/25. As a point of emphasis, SANDAG has communicated that their #2 goal in this project is to "**Minimize Community Impacts**" after "Relocate from Bluffs." Let's see SANDAG put their money (actually, taxpayer money) where their mouth is.

Of the 4 routes that are in consideration, none of these are ideal as they all require eminent domain. The displacement of any residents and businesses will create terrible disruption, emotional and financial stress, which all affect livelihoods and community stability. There is already enough economic uncertainty as it relates to government funding (potential cuts in Medicaid, Medicare, Social Security), stubborn inflation/stagflation, and changes in the labor market with artificial intelligence (i.e. layoffs). We are already having to cope and prepare for these changes to our economic situation. Eminent domain in Del Mar would only exacerbate the adverse economic and community impact for its citizens, displacing many due to the high real estate prices and home ownership costs (i.e. home insurance and property taxes).

I am writing to urge SANDAG to bring forth as a 5th option, the "more northerly design concept" of the yellow line (San Dieguito Bridge to I-5 Alternative Alignment) and fully support this option. In general, I believe that an I-5 alignment/inland corridor is most sustainable and efficient; however, the current yellow line option requires eminent domain of homes and businesses along San Dieguito Drive and Racetrack View Drive.

Eminent domain often results in unfair compensation (leading to a sense of loss and injustice), as property values paid won't accurately reflect the true value of a property. This can lead to disputes over compensation amounts or the legality of the eminent domain process, creating lengthy and costly legal battles, litigation and additional stress for property owners.

Please consider the residents' lives, homes, businesses, economic and community impact! And while I commend SANDAG for adding the I-5 alignment option as a consideration, let's get this option right!

Sincerely,
Karen Ou

From: Tina Overland [redacted]
Sent: Thursday, June 26, 2025 8:39:53 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Tina N. Overland
Encinitas

Sent from my iPhone

From: George Pache [redacted]
Sent: Saturday, June 21, 2025 7:59:44 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Northern Yellow Line

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.

Georgia Pache
Del Mar resident
[redacted]

Sent from my iPhone

From: Clarence Pasion [redacted]
Sent: Friday, June 27, 2025 4:19:02 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Clarence Pasion

From: Ellen Patterson [redacted]
Sent: Monday, June 30, 2025 10:13:41 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Rail realignment concerns

Hello,

I am a homeowner in Sea Point Del Mar and a real estate agent in Del Mar.

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you

Ellen Patterson, REALTOR®
[redacted]
DRE Lic. 02068571

From: [redacted]
Sent: Monday, June 30, 2025 9:51:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Comment on Pink Line and Green Line Routes

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds.

Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,

Bill Paxton
Del Mar

Attachments: LOSSAN public input.pdf
Public Comment on LOSSAN Rail Realignment Project.docx

From: Stephen L Pendergast [redacted]
Sent: Sunday, May 18, 2025 11:00 AM
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

See attached document for public input on LOSSAN EIR in both MS Word and pdf.

Stephen L Pendergast
[redacted]
Cell: [redacted]

Public Comment on LOSSAN Rail Realignment Project

Notice of Preparation Draft Environmental Impact Report

June 25, 2025

San Diego Association of Governments
Attn: LOSSAN Comments
1011 Union Street, Suite 400
San Diego, CA 92101

Subject: Comments on the Notice of Preparation for the LOSSAN Rail Realignment Project

To Whom It May Concern:

I am writing to provide formal input on the San Diego LOSSAN Rail Realignment project in response to SANDAG's request for public comments on the Draft Environmental Impact Report (EIR) scoping process. After reviewing the available project materials and conducting an independent engineering analysis of the proposed alternatives, I respectfully submit the following comments for consideration.

Preferred Alternative Recommendation

Based on comprehensive analysis of seismic risk, cost considerations, environmental impacts, and disruption to residential and commercial activities (see https://stateofthiscity.blogspot.com/2025/05/community-feedback-on-lossan-rail.html), I strongly recommend that SANDAG prioritize detailed analysis of the **Blue Line (Crest Canyon)** tunnel option. While all alternatives present tradeoffs, this option offers the most balanced approach for this critical piece of infrastructure that will serve the region for a century or more.

Key Considerations Supporting This Recommendation

1. Superior Seismic Safety - The Blue Line alternative presents the lowest seismic risk profile of all options, with its alignment running primarily through stable Torrey Sandstone formations. In a seismically active region like Southern California, this represents a significant advantage for critical transportation infrastructure with a 100+ year expected lifespan.

2. Environmental Protection - The Blue Line demonstrates superior environmental performance among the tunnel options, with lower potential impacts on sensitive wetland ecosystems. Its southern portal location in an undeveloped area minimizes disruption to established habitats, and the complete relocation away from the coastal bluffs supports long-term coastal preservation goals.

3. Community Impact Considerations - While all tunnel options present community impacts, the Blue Line's routing through less densely populated areas and portal locations away from major residential concentrations represents a more balanced approach to minimizing direct impacts on Del Mar residents.

4. Long-term System Performance - This alternative delivers excellent operational benefits, accommodating speeds up to 110 mph while providing complete double-tracking. The resulting travel time improvements of 1.8-4.5 minutes support regional transportation goals of making rail a more competitive and viable alternative to highway travel.

5. Long-term Resilience - Unlike the Green Line option, the Blue Line completely addresses fundamental coastal erosion concerns by relocating tracks inland, providing a genuinely long-term solution rather than a continued mitigation approach.

Criterion	Yellow Line (I-5)	Blue Line (Crest Canyon)	Purple Line (Camino Del Mar)	Green Line (Bluff Reinforcement)
Construction Cost Billions				
Low	$ 3.800	$ 3.700	$ 3.300	$ 1.800
High	$ 5.100	$ 5.000	$ 4.400	$ 2.500
Seismic Risk	Moderate	Low	Moderate	High
Environmental Impact	Moderate	Low-Moderate	Moderate	Moderate-High (long-term)
Residential Disturbance	Low	Moderate	Moderate-High	Low (construction) High (ongoing)
Construction Complexity	High	Moderate-High	Moderate	Low-Moderate
Operational Benefits	Low	High	High	Moderate
Travel Time Reduction	0.4-2.5 min	1.8-4.5 min	1.8-4.5 min	Minimal

Cost-Benefit Analysis

I acknowledge the significant cost of the Blue Line option ($3.7-5.0 billion) and understand the appeal of the less expensive Green Line alternative ($1.8-2.5 billion). However, I urge SANDAG to fully evaluate lifecycle costs in the EIR, including:

- Long-term maintenance requirements
- Potential future costs associated with continued bluff erosion
- Economic impacts of service disruptions
- Potential liability concerns of maintaining tracks in erosion-prone areas
- Competitive grant funding opportunities specific to climate resilience projects

When viewed through a 100-year infrastructure lens, the additional investment required for the Blue Line option is justified by its superior performance in safety, resilience, and environmental protection.

Additional EIR Scoping Recommendations

I respectfully request that the EIR include thorough analysis of the following:

1. **Detailed geotechnical assessment** of all alignment options with particular attention to fault crossing considerations
2. **Comprehensive sea level rise modeling** with projections extending through 2150 to account for the full infrastructure lifespan
3. **Construction phasing plans** that minimize disruption to existing rail operations
4. **Quantitative assessment of travel time benefits** for each alternative under various equipment scenarios including future zero-emission multiple units
5. **Detailed evaluation of tunnel ventilation requirements** and emergency response plans
6. **Thorough analysis of community impacts** during both construction and operation phases
7. **Potential rail service expansion opportunities** enabled by each alternative

Conclusion

The LOSSAN Rail Realignment project represents a once-in-a-generation opportunity to address critical safety concerns while enhancing regional mobility. The Blue Line (Crest Canyon) alternative, despite its higher cost, offers the best balance of seismic safety, environmental protection, operational improvements, and community considerations.

I appreciate the opportunity to provide these comments and look forward to SANDAG's continued engagement with the community throughout this important process.

Respectfully submitted,

Stephen L Pendergast
[redacted]., San Diego, CA 92129
[redacted] Cell: [redacted]

cc: Del Mar City Council
North County Transit District Board
California Coastal Commission

From: Rick Pentella [redacted]
Sent: Wednesday, June 25, 2025 6:07:20 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Hello SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you for your consideration,
Rick

Outlook

I-5 Knoll for southern portal preferred.

From Matt Pepe [redacted]
Date Fri 7/4/2025 2:18 PM
To LOSSAN Comments <lossancomments@sandag.org>

I live along Carmel Valley Road, and I strongly support the I-5 Knoll location for the southern portal. Please stop wasting money exploring other options.

Thank you
Matt

From: Susan Sealock [redacted]
Sent: Wednesday, May 28, 2025 11:29:30 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Train Route

Dear SANDAG,

I am unable to attend the meeting tomorrow night, but wanted to voice my support for the Northern Yellow Line.

Thank you,

Susan Perry
[redacted]
Del Mar, CA 92014

From: Kristin Philipps [redacted]
Sent: Monday, June 30, 2025 11:16:41 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."
Kristin philipps

Get Outlook for iOS

Outlook

Train realignment

From Suzanne Piche [redacted]
Date Mon 6/30/2025 1:06 PM
To LOSSAN Comments <lossancomments@sandag.org>

I am strongly opposed to any further consideration of the proposed Pink Line and Green Line routes. "There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

From: Helen Pinegar [redacted]
Sent: Friday, June 27, 2025 6:51:01 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Proposed Pink and Green line routes

To whom it may concern:

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

This development will significantly decrease our property values and cause major disruption to the entire community. It threatens to completely destroy the unique charm and character that make our neighborhood special. The traffic is already bad enough!

Thank you,

Helen Pinegar

From: Jacqueline Pines [redacted]
Sent: Wednesday, June 25, 2025 4:54:18 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Attachments: image001.png

From: Tim Pinkert [redacted]
Sent: Friday, June 27, 2025 3:41:08 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Cathy Pinkert [redacted]
Subject: Del Mar SANDAGS Relocation

Hi SANDAG,

The Blue line (Hill) option to bore a hole under Del Mar will directly impact our property that has been in our family for 70 years.

We will directly oppose all attempts by any means with SANDAG to place a train under our community.

Thanks for your time,

Tim & Cathy Pinkert

Tim Pinkert
CEO
Nexgen Digital, Inc.
(949) 475 8900 x1407
(949) 475-0028 fax

NexGen Digital
www.nexgendigital.com

From: Jonathan Polikoff [redacted]
Sent: Monday, May 26, 2025 6:15:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Terry Gaasterland <gaasterland@gmail.com>; Patti P [redacted]
Subject: LOSSAN Rail Realignment (Del Mar Tunnel)

To SANDAG:
Comments regarding the LOSSAN Rail realignment after reviewing the post value analysis study (issued May 2025).
I'd like to go on record stating the following should be considered primary - before cost and rail speed.
1. Minimizing any impact on Del Mar properties - to include eminent domain and other impacts (noise / vibration/ air pollution etc.)
2. Allowing Del Mar small businesses to continue to operate during construction without fear of bankruptcy during construction.
This is an existential threat to the City of Del Mar - the project needs to be designed to minimize impact to our city.
Easy egress from the City of Del Mar needs to be kept open at all times (north/ east and south) during construction to preserve our safety during potential wildfire events and other acts of God.
Any plan that compromises the safety of our citizens should be ruled out.
Thank you for your consideration,
Jonathan and Patricia Polikoff
Del Mar, Ca

From: Beth Polis [redacted]
Sent: Friday, June 27, 2025 10:52:27 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Train tunneling

To Whom It May Concern,

There are significant issues with the Pink and Green lines routes. These routes are environmentally damaging, will completely devastate several neighborhoods and cause property values to crash and lack community support.

Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents.

Continuing to analyze the Pink and Green lines is clear misuse of taxpayer funds.

The last option suggested was to leave the tracks as is on the bluff after spending millions of dollars shoring up the bluffs , and would be an excellent option.

Therefor, we strongly urge you to remove the Pink and Green routes from further consideration.

Thank you,

Beth Polis
Sent from Beth's iPhone

Outlook

SDLRR Project NOP

From gail puente [redacted]
Date Wed 6/25/2025 4:08 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Gail Puente
[redacted]

Outlook

Del Mar Train Realignment

From Curt Pullen [redacted]
Date Sun 6/29/2025 3:21 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear LOSSAN,

We are residents on the Del Mar Terrace and have strong objections to the proposed Pink and Green Line routes.

These routes are environmentally damaging and lack community support and would present enormous disruption to our community…not only during 10+ years of construction but throughout the continued utilization of the rail line.

Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents.

Alternatively, continuing to reinforce the existing lines and location would be far more cost effective and less negatively impactful to a realignment effort and more analysis should be done on this option.

In any case, continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds.

Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.

Curt Pullen
[redacted]
Del Mar, CA 92014

Outlook

SDLRR Project NOP

From Muhammad Qazi [redacted]
Date Sun 6/29/2025 2:50 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

From: Nathan Qiu [redacted]
Sent: Wednesday, May 28, 2025 8:00 PM
To: LOSSANcorridor <lossancorridor@sandag.org>
Subject: Proposal for LOSSAN Realignment

My name is Nathan Qiu, and I'm a junior at Canyon Crest Academy and a 10-year resident of Pacific Highlands Ranch.

I have been exploring the LOSSAN rail realignment project, and have decided to dedicate my summer to using my background in Computer Science, GIS, and Machine Learning to improve how residents engage with the LOSSAN realignment. This email is to submit a preliminary proposal to the May 29th, 2025 SANDAG scoping meeting. The goal of my interactive map tool is to help residents see how each proposed route might affect their home and neighborhood. This is a prototype that I will migrate into ArcGIS and continue to develop over the 30-day comment period. I believe that an interactive map will be a great first step to support broader community understanding and engagement.

Here is a link to my interactive map website:
https://lossan-realignment.streamlit.app/

I'm eager to work with SANDAG to make the tool as robust a resource as possible, and can't wait to get your feedback.

Nathan Qiu

From: shriya :] [redacted]
Sent: Wednesday, June 25, 2025 11:25:57 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

From: Camilla Rang [redacted]
Sent: Wednesday, May 28, 2025 3:11:47 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

To SANDAG:

My name is Camilla Rang and I live in Del Mar. SANDAG needs to study a new rail route, the so called Northern Yellow Line, which meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The NYL route (imaged above) is described briefly, going southward, as follows:

From the southern edge of the special events platform, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, taking advantage of the Easement that runs around the Fairgrounds, and taking into consideration the Living Levee that will be built along the edge of the river, rising in elevation until it reaches Jimmy Durante Blvd. It then crosses over Jimmy Durante Blvd on an elevated bridge which continues eastward across the southern edge of the Del Mar Golf Driving Range which is part of the State-owned Fairgrounds property (north of the San Dieguito Lagoon) until it heads south and crosses the lagoon just west of the I-5. The line would then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other three alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to

existing homes (and) businesses…" SANDAG's yellow route shown on the NOP would have severe adverse impacts on 35-60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon Route and Camino Del Mar routes utilize a North Portal located at the intersection of Jimmy Durante and Camino Del Mar would require extensive eminent domain taking of approximately 35-50 homes and businesses, lower property values and livability for residents and stability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds. The South Portal for the Camino Del Mar Option at the southern end of Del Mar will also take homes by eminent domain and put a portal near homes and the tunnel under homes. The Camino Del Mar option will virtually cut off the access into and out of Del Mar North and South for over a decade. The Crest Canyon Route will virtually seal off the northern access into and out of Del Mar for over a decade as well. These routes impact the Evacuation route out of Del Mar, which utilizes Jimmy Durante. Double Tracking the fragile bluff is out of the question and against Coastal Commission rules. In fact, this route already went through an EIR and was strongly rejected due to environmental impact. Nothing has changed to the better since. To install 20 foot tall beach walls all along Del Mar's beaches will destroy the whole area and the beaches will disappear completely within 1-2 decades. Homes also will have to be taken between 14-9th street due to the required construction of a second rail east of the existing rail. The train is already pretty much going by right outside people's yards.

However, SANDAG Staff's recommendation to study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar, or any other community

2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon and avoids construction of a second set of rails on an additional berm right through the sensitive lagoon.

3) Has no negative impact on the City of Solana Beach

4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes

5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.

6) Eliminates expensive tunnels under private property and below sea level
7) Assumes the Fairgrounds will have their special events platform as planned
8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Sincerely,

Camilla Rang

From: Camilla Rang [redacted]
Sent: Wednesday, May 28, 2025 8:28 AM
To: Mario Orso <mario.orso@sandag.org>; Danny Veeh <danny.veeh@sandag.org>; Maria Rodriguez Molina <maria.rodriguezmolina@sandag.org>; Keith Greer <keith.greer@sandag.org>
Cc: kevin.shin@carlsbadca.gov; priya.bhat-patel@carlsbadca.gov; keith.blackburn@carlsbadca.gov; cchavez@chulavistaca.gov; cfernandez@chulavistaca.gov; minzunza@chulavistaca.gov; jduncan@coronado.ca.us; cdowney@coronado.ca.us; mfleming@coronado.ca.us; asteward@coronado.ca.us; tgaasterland@delmar.ca.us; tmartinez@delmar.ca.us; jspelich@delmar.ca.us; bwells@elcajon.gov; sgoble@elcajon.gov; behlers@encinitasca.gov; lshaffer@encinitasca.gov; jlyndes@encinitasca.gov; dwhite@escondido.org; jfitzgerald@escondido.org; jgarcia@escondido.org; jack.fisher@imperialbeachca.gov; mitch.mckay@imperialbeachca.gov; matthew.leyba-gonzales@imperialbeachca.gov; marapostathis@cityoflamesa.us; lcazares@cityoflamesa.us; llothian@cityoflamesa.us; asnow@lemongrove.ca.gov; jmendoza@lemongrove.ca.gov; jheredia@lemongrove.ca.gov; Lmolina@nationalcityca.gov; Rmorrison@nationalcityca.gov; Dyamane@nationalcityca.gov; esanchez@oceansideca.org; ejoyce@oceansideca.org; jfigueroa@oceansideca.org; svaus@poway.org; pdehoff@poway.org; cpikus@poway.org; mayortoddgloria@sandiego.gov; KentLee@sandiego.gov; marnivonwilpert@sandiego.gov; joelacava@sandiego.gov; vivianmoreno@sandiego.gov; SeanEloRivera@sandiego.gov; rjones@san-marcos.net; emusgrove@san-marcos.net; msannella@san-marcos.net; jminto@cityofsanteeca.gov; lkoval@cityofsanteeca.gov; rhall@cityofsanteeca.gov; lheebner@cosb.org; jedson@cosb.org; dzito@cosb.org; kmelendez@cityofvista.com; dodonnell@cityofvista.com; jfranklin@cityofvista.com; Joel.anderson@sdcounty.ca.gov; Terra.Lawson-Remer@sdcounty.ca.gov; Monica.MontgomerySteppe@sdcounty.ca.gov
Subject: SDLRR Project NOP

Dear Sandag Lossan realignment team and board members,

In preparation for your presentation of the NOP in Del Mar on May 29, 2025, I submit the following letter.

My name is Camilla Rang and I live in Del Mar. SANDAG needs to study a new rail route, the so called Northern Yellow Line, which meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line" (NYL).

"Northern Yellow Line"

The NYL route (imaged above) is described briefly, going southward, as follows:

From the southern edge of the special events platform, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, taking advantage of the Easement that runs around the Fairgrounds, and taking into consideration the Living Levee that will be built along the edge of the river, rising in elevation until it reaches Jimmy Durante Blvd. It then crosses over Jimmy Durante Blvd on an elevated bridge which continues eastward across the southern edge of the Del Mar Golf Driving Range which is part of the State-owned Fairgrounds property (north of the San Dieguito Lagoon) until it heads south and crosses the lagoon just west of the I-5. The line would then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other three alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow route shown on the NOP would have severe adverse impacts on 35-60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon Route and Camino Del Mar routes utilize a North Portal located at the intersection of Jimmy Durante and Camino Del Mar would require extensive eminent domain taking of approximately 35-50 homes and businesses, lower property values and livability for residents and stability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds. The South Portal for the Camino Del Mar Option at the southern end of Del Mar will also take homes by eminent domain and put a portal near homes and the tunnel under homes. The Camino Del Mar option will virtually cut off the access into and out of Del Mar North and South for over a decade. The Crest Canyon Route will virtually seal off the northern access into and out of Del Mar for over a decade as well. These routes impact the Evacuation route out of Del Mar, which utilizes Jimmy Durante. Double Tracking the fragile bluff is out of the question and against Coastal Commission rules. In fact, this route already went through an EIR and was strongly rejected due to environmental impact. Nothing has changed to the better since. To install 20 foot tall beach walls all along Del Mar's beaches will destroy the whole area and the beaches will soon disappear completely. Homes also will have to be taken between 14-9th street due to the required construction of a second rail east of the existing rail. The train is already pretty much going by right outside people's yards.

However, SANDAG Staff's recommendation to study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar, or any other community

2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon and avoids construction of a second set of rails on an additional berm right through the sensitive lagoon.

3) Has no negative impact on the City of Solana Beach

4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes

5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.

6) Eliminates expensive tunnels under private property and below sea level

7) Assumes the Fairgrounds will have their special events platform as planned

8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

Sincerely,

Camilla Rang

From: Camilla Rang [redacted]
Sent: Saturday, June 21, 2025 7:01:08 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Study the Northern Yellow Line!

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.

Double tracking the bluff should be taken off the study. It is not a feasible option. Neither the bluff nor the beach will be able to withstand all the steel and concrete reinforcements or the requires 20 foot high seawalls. As the Coastal Commission already informed you per their letter dated Feb 27, 2025, they will never let it pass. To include double trucking the bluff in yet another doomed EIR is (yet another) complete waste of tax money and engineer's hard work.

Sincerely,

Camilla Rang
Del Mar

Outlook

SDLRR Project NOP

From Joan [redacted]
Date Wed 6/25/2025 1:08 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Sent from my iPhone

Outlook

Comment on Proposed Pink and Green Line Routes

From Michael Reher [redacted]
Date Mon 6/30/2025 10:58 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG,

I am writing as a concerned community member about significant issues with the Pink Line and Green Line routes.

These routes are environmentally damaging and lack community support.

Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents.

Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds.

Therefore, my family and I strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you for your hard work and your attention to the concerns of the community.

Regards,
Michael Reher

Attachments: DMWoods comment letter to amended SANDAG NOP 6-26-25 final.pdf

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From: Steve Reich [redacted]
Sent: Sunday, June 29, 2025 10:37 AM
To: LOSSANcorridor <LOSSANcorridor@SANDAG.org>
Cc: Steve Reich [redacted]; 'Constance E. Gonczy' [redacted]
Subject: SANDAG NOP

Hello-

Attached is a letter sent to SANDAG from Del Mar Woods Homeowners Association regarding possible routes the trains could take to get trains off the Del Mar bluffs. As homeowners in the complex known as Seaview just south of Del Mar Woods, we are in full agreement with the document which finds the Northern Yellow Route the only viable route currently under consideration.

We will work with all the others who think the other routes jeopardize the Del Mar Fairgrounds, the City of Derl Mar itself, and residents of Del Mar.

Steven Reich and Constance Gonczy
[redacted]
Del Mar, CA 92014
SDR: [redacted]
CEG: [redacted]

To: **SANDAG**

At: **LOSSANcorridor@SANDAG.org**

From: **DEL MAR WOODS HOMEOWNERS' ASSOCIATION**

Date: **June 29, 2025**

Re: **SDLRR PROJECT NOP**

Del Mar Woods Homeowners' Association Comments on Notice of Preparation of Draft Environmental Impact Report on Track Relocation ("NOP").

Dear LOSSAN SANDAG PROJECT DEVELOPMENT TEAM:

The Del Mar Woods Homeowner's Association submits the following comments to the May 15, 2025, Notice of Preparation of the Draft Environmental Impact Report for the San Diego Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project) located in the cities of Del Mar, Solana Beach and San Diego, California ("NOP").

I. INTRODUCTION

Thank you for the opportunity to comment on the updated NOP for the relocation of the train tracks off the crumbling bluffs of Del Mar. This comment is submitted on behalf of the 126 families and other owner-members of Del Mar Woods Homeowners Association ("DMW"), whose physical address is 265 Stratford Court Del Mar and whose mailing address is c/o Ron Lopezi, Menas HOA Management at 7592 Metropolitan Drive Suite 401 San Diego, CA 92108. DMW reserves the right to comment further on any revised NOP, draft EIR or EIS or final EIR or EIS. DMW thanks members of the SANDAG project team for the recent outreach at the Fairgrounds and for being responsive to questions sent via e-mail to the project team by Karen Lare, the President of its HOA. We refer in our letter to the proposed routes as outlined on the included amended NOP diagram which includes both the Northern Yellow Line Route as well as the South Yellow Line Route.

Del Mar Woods Condominium Community Location

DMW is a 126-unit condominium and townhome community located in the southwest corner of Del Mar, CA. Approximately 60 condominium homes are located between the southmost portion of Camino Del Mar, in Del Mar, looking west, and the southmost portion of Stratford Court in Del Mar, and approximately 60 units are located between the southmost portion of Stratford Court and the Del Mar Bluffs where the trains currently operate. To the direct north of the DMW HOA complex is the multi-family apartment complex of Los Arboles consisting of 97 rental housing units. East of DMW are homes along the east side of Camino Del Mar. South of DMW are more homes and a quiet reserved wooded area owned by Torrey Pacific Corporation. As a result of the multi-family housing in the southwest portion of Del Mar, the area is densely populated. The multi-family units were built in the 1970's and many of the residents therein are elderly but there are also families with young children.

Figure 3. Four Project Alternative Alignments

II. PRELIMINARY STATEMENT ON NOP OF May 15, 2025

In a review of the updated NOP, the HOA was disappointed to see that the placement of the portal areas were not changed significantly from the previous NOP, and in fact despite the extensive time spent on the value analysis study, the proposed routes did not change significantly either. Of the five routes listed only three routes would relocate the trains off the bluff (despite it being the stated objective of the $300M grant being used to do the current study, while the remaining two would have it remain on the bluffs, an idea that has been rejected by the California Coastal Commission multiple times and in fact, the need to relocate the train tracks off of the bluff was called out to SANDAG by the Coastal Commission in their approvals of both of the DMB #4 and DMB#5 bluff stabilization projects.

The NOP calls out the need to decrease travel time on the train trip from Oceanside to San Diego as one of the key objectives. The HOA has spent time studying all routes and finds that the damages and negative impacts caused to the Del Mar business owners, residents and visitors by the Purple, Blue, Yellow and Green Line Routes far outweigh any increase gained by these routes over the citizen proposed Northern Yellow Line Route. The use of eminent domain and the need to tear up the town for extended periods of

construction will create an adversarial relationship between SANDAG/NCTD/BNSF/Amtrak and the community of Del Mar which includes its annual visitors, residents, business owners and homeowners.

Members of the HOA Board have attended and spoken at several of the SANDAG Board meetings and were pleased that Mario Orso stated at the February 28, 2025 and March 14, 2025 SANDAG Board meetings, that he was "committed" to study the Northern Yellow Line route in the Environmental Impact Report even though it is shown only in the footnotes of the document, citing lack of sufficient time to develop the route as the reason that it was not a formal part of the recommended routes. We believe Mr. Orso will be true to his words and that in fact, this alternative route will be included as a route in the EIR study for final consideration. The HOA Board appreciates that Mr. Orso has taken the time, along with his team, to listen to the community and that the senior team seems to understand the impact the community will feel with any of the other four routes (omitting the no build route).

Specific to Del Mar Woods HOA, the path of the Purple Line Route along Camino Del Mar does not truly follow Camino Del Mar and in fact takes a turn as it approaches 4th street and goes directly under Los Arboles, a four-story apartment building, home to people of all ages and income levels, and under the two-story and three-story buildings of Del Mar Woods. The NOP shows that the train route then goes under the homes to the south of Del Mar Woods and out of a portal a few hundred meters beyond the property. The train depth under Del Mar Woods is shallow given the potential risks of train derailment and subsequent explosion from the flammable materials transported on the freight and military cars.

III. COMMENTS ON THE SOUTH PORTALS

In our review of the documents provided, there is still insufficient information in the NOP to comment **fully** on the Portal Options (or on the NOP Route Options). For example, as to portals, while there is additional information and maps, the NOP lacks critical information on the exact path of the route regarding specific location, width, height of portal, or the width, depth underground and height of the tunnel, the size and location of ventilators, the location, acreage, size of ventilation related buildings referenced in SANDAG's 2023 Tunnel Analysis Report ("2023 SANDAG Report"), noise and vibration levels of construction and operation of the trains, staging area of construction or duration of construction. **Nonetheless, there is sufficient information for DMW to make initial comments.**

The South Portal Options are as follows:

Two south portal locations have been identified depending on the track alignment. The portal locations are as follows:

Torrey Pines Road Portal

This proposed portal would be located near the intersection of Carmel Valley Road and North Torrey Pines Road. The portal infrastructure would cross underneath Carmel Valley Road and potentially extend into residential and commercial properties in Del Mar.

DMW strongly objects to the "Torrey Pines Road" south portal option. The Torrey Pines Road portal option would be located near the intersection of Carmel Valley Road and Torrey Pines Road, which is at the

southern tip of Camino Del Mar and only a few hundred meters from Del Mar Woods and many other homes and businesses. A Project Objective is to **"Minimize impacts in the surrounding communities during and after construction."** This objective is of particular importance to Del Mar residents in light of the fact that while all of San Diego is said to benefit from the rail line, it is the Community of Del Mar that is being compelled to disproportionately, and almost exclusively, shoulder the burden of the realignment. The very least that SANDAG can do is to select or create portals and a route that minimizes the negative impacts to Del Mar and its residents.

Other cities benefit from rail service, but no other city is affected by the choice of the realignment route and the portals as is Del Mar (the City of San Diego would be slightly impacted by the alternate choice of the I-5 Knoll option). The selection of the Torrey Pines Road Portal would maximize negative impact to our community. Some of the reasons, among others are:

- The portion of the Del Mar community that is very close to the Torrey Pines Road portal option is densely populated. It includes the 126-condominiums of DMW, the 97 apartments of Los Arboles, and numerous single-family homes close to Camino Del Mar, Stratford Court, 4th Street and Carmel Valley Road as well as businesses on the north and south sides of the western end of Carmel Valley Road. The residents living in the homes would all suffer negative health effects and aesthetic loss identified as meaningful by CEQA (p.9 of the NOP):
    - Air Quality will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of fumes and pollution from diesel output and other concentrated Greenhouse Gas Emissions spewed from the ventilation systems close to their homes.
    - Virtually continuous Noise of the ventilation systems and both Noise and Vibration of continuous freight and passenger trains descending and traveling right under their homes.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Continuous **Noise** of trains entering and exiting the portal.
    - Long term negative health effects shown to be associated with living near trains including loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of children with learning disabilities.[1]
    - The risks of carrying **Hazardous Waste** under their homes.

[1] Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/

Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-problems#:~:text=Each%20four-decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

    - The **Hazard** risk of derailment close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
- In addition to the decline in quality of life experienced by residents in the immediate vicinity of the Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:
    - The loss of much of the **aesthetic benefits** of an iconic scenic location where Torrey Pines Beach first comes into view driving or walking south from 4th Street to Torrey Pines State Beach.
    - Elimination of pedestrian and bicycle paths during construction.
    - The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See 2023 SANDAG Tunnel Analysis Report).
    - Blockage or impeding during construction (and likely after) the access to one of the main routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many people use the Torrey Pines Road route to bypass the I-5.
    - The delivery of **Emergency Public Services** will be impeded or blocked.
    - Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which have been there for decades.
    - All of the detriments to Del Mar's residents discussed above.
    - The loss of additional square meters of environmentally sensitive lagoon acreage with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon.

I-5 Knoll Portal

In contrast, the construction of the alternate I-5 Knoll portal would have none of the above effects. Thus, of the few study options for the South Portal offered by SANDAG in the NOP, **the I-5 Knoll is by far the better alternative with the lesser negative impacts to the community.**

IV. COMMENTS ON THE NORTH PORTAL OPTIONS

The North Portal options in the updated NOP are as follows:

Under Jimmy Durante Boulevard Portal

This proposed portal would be located north of the intersection of Camino Del Mar and Jimmy Durante Boulevard. The portal's infrastructure would cross underneath Jimmy Durante Boulevard, which would be raised. **The portal structures would potentially extend into commercial and residential properties in Del Mar.**

I-5 Racetrack View Portal

This proposed portal would be west of the I-5 Freeway close to homes located south of the fairgrounds along Racetrack View Drive. The route would be elevated along the protected San Dieguito Lagoon right along the nesting area for the Western Snowy Plover and other native species (some endangered) which was built at great expense with the restoration of the Lagoon. This route will cause issues for wildlife and untold issues for the thirty plus homes close to that portal.

The Jimmy Durante Boulevard option ("JDB") is unacceptable. **The portal construction and operation would inflict the maximum negative impact on Del Mar, its businesses and residents**. As shown on the NOP maps, the extension of the JDB portal into commercial and residential properties is not "potential," it is certain. The selection of this portal would shut down commercial operation of Del Mar's only main street, Camino Del Mar, for the duration of construction and destroy Del Mar's economic base. The small businesses and restaurants on Camino Del Mar would never recover. In addition, if construction of the Torrey Pines Road portal and the JDB portal were to proceed simultaneously, Del Mar Heights Road would be the only ingress into and egress out of Del Mar. Del Mar Heights Road is already a high traffic area, it would be complete gridlock if the other two means of entrance and exit are blocked or impeded.

The Racetrack View Portal Option is a challenge in many ways as noted above. It is located very close to the San Dieguito Lagoon, a protected wetlands, that underwent a major restoration that began in 2006 and Phase II was recently completed in 2024. This location will dramatically impact both homes and the lagoon. While it is going to move the construction further from the City center there is no entrance to this route without going through the main intersection that supports all traffic for the racetrack and fairgrounds in and out of Del Mar. This impact will be felt by both residents and visitors, and it will dramatically impact evacuation routes with heavy equipment and trucks.

V. DEL MAR WOODS' COMMENTS ON THE NOP STUDY ROUTES

Purple Line, Blue Line and South Yellow Line Routes

For many of the same reasons Del Mar Woods Homeowners' Association objects to the Torrey Pines Rd. south portal, it objects to the Purple, Blue, and South Yellow Routes.

- Regarding the Purple Line Route, which tunnels under Camino Del Mar, the amount of disruption and destruction to Del Mar businesses in the construction process would be continuous and extreme. Few businesses will survive it. It will destroy the town's economic base and the small-business culture of the city. A double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on residents' homes and families living on either side of Camino Del Mar and on Stratford Court would suffer:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.

    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.
    - Accelerated bluff erosion as the vibrations from the tunnel through the sandstone will cause additional cracks in the earth allowing water penetration and erosion to occur.
- Regarding the Blue Line Route, a portal right into people's homes and at an elevation to allow noise to carry across the entire area will cause irreparable harm to many. The double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on homes and families living on either side of the portal and over the tunnel will be:
    - Virtually continuous Noise and Vibration of continuous freight and passenger trains traveling underground next to and under their homes
    - Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety.
    - The risks of carrying Hazardous Waste near their homes
    - The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone).
    - Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.
    - Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind.

Green Line Route

The addition of a double-tracked bluff route was not a welcome addition to the updated NOP in our view. We understand and appreciate the staff's desire to include a non-tunnel option however it does not pass even a rudimentary feasibility test.

The purpose of the study of the proposed routes is to move the tracks off the crumbling sandstone bluff not to study ways to add additional tracks to a fragile environment. The entire reason for the EIR study is that the Del Mar Bluffs are eroding at a rapid pace. Expanding track service to double- track on the Bluffs would mean essentially replacing the Bluffs with steel and concrete throughout the length of the bluffs and beach in Del Mar, essentially a permanent deprivation of the bluffs and beach at the expense of the public. The

almost $2.0 Billion price tag demonstrates that this option contemplates, not a stabilization project, but rather a complete destruction and re-engineering of that portion of the coast, a devastation completely at odds with the citizen initiated Coastal Act that has governed the California coast for 50 years. According to SANDAG, double tracking on the bluffs would require in addition to installation of a second railroad track:

- Construction of a trench and retaining walls
- Construction of new and expanded seawalls
- Construction of other unidentified "bluff stabilization" elements
- Construction of new and/or retrofit of existing bridge structures
- Installation of communication and noise systems, including signals, switches, and control points
- Modifications to drainage and unidentified roadways

As the Coastal Commission promptly pointed out in its Senior Environmental Scientist's letter of February 27, 2025, finding the alternative not viable and urging SANDAG to "act to not move forward this alternative for further consideration in the draft EIR:" According to the Coastal Commission "If implemented, the Del Mar Double Track Reinforce Alternative would be in direct conflict with the Commission's action in CC-0005-21 [conditional permit to stabilize the Bluffs], its SLR guidance for critical infrastructure and SANDAG's commitment to relocate the tracks from the Del Mar Bluffs and remove the seawalls."

The Coastal Commission must be heeded. Notably, the Surface Transportation Board has ruled in regard to the Del Mar Bluff stabilization project that federal law does not preempt state environmental laws, but rather that the Coastal Zone Management Act, a federal law, requires that projects on the Del Mar Bluffs receiving any federal funds be consistent with the Coastal Act, as determined by the Coastal Commission. NCTD Petition for Declaratory Order, Decision by Surface Transportation Board, Case No. FD36433, Filing No. 51509 served May 23, 2023.

This option also requires the use of eminent domain to take private property so that the eroded thin crumbling bluffs can be expanded to the east.

Northern Yellow Line Route

The Northern Yellow Line Route is the only one that utilizes the non-populated areas of this beachside community and public lands. It allows the route to be built with the lowest impact on residents and the least impact on businesses. It would allow businesses to remain open during construction and limits the impacts to private homes by routing the train along public lands where gaining the necessary right of way would be much simpler and less expensive.

With consideration given to maintaining the horse racing and fair schedules and to strategically planning how to do the construction staging in such ways as to minimize impact to fairground operations, this route is far superior to any of the other routes in the NOP. The impact on residents in Del Mar and San Diego would be far less and it would also limit the traffic flow disruptions for residents of all of the beach communities who use the routes through Del Mar for commuting to work or school or for access to restaurants and businesses.

This route would also dramatically limit the number of lawsuits that SANDAG and NCTD will face over eminent domain and the purchasing of land access rights and would head off the foreseeable class action suits that will be brought to compensate for generations of adverse health effects if any of the other routes are selected.

In short it has the following advantages:

1. No negative impact on ANY homes or businesses.
2. Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.
3. Places no air-polluting portals near homes, near the coast or near the Fairgrounds.
4. Bores no tunnels under or near homes.
5. Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an
   easement for which compensation can be paid to the Fairgrounds without displacing families.
6. No negative impact on the City of Solana Beach.
7. Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.
8. Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform.
9. Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon.
10. It is expected to cost considerably less than other routes that require tunneling right under homes and eminent domain of homes and businesses.
11. Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delays.

IV. COMMENTS ON SANDAG'S RESPONSIBILITY TO DO A "NO PROJECT" ANALYSIS AND TO HAVE A COST/BENEFIT ANALYSIS PREPARED.

As part of its draft EIR, SANDAG must do a "no project" analysis. In addition, the SANDAG Board, in fulfillment of its duty of reasonable business prudence, must have an independent cost/benefit analysis prepared.

"No Project"

CEQA requires SANDAG engineers to do a "no project" analysis as an alternative. In this case, since continuing bluff instability mandates that the trains must stop operating on the bluffs, removing the tracks must proceed. If, however, after SANDAG does a cost/benefit analysis, it is determined to move forward with relocating the tracks as opposed to finding 21st Century ways to move freight and people, then the "no project" analysis really means "not this project" and would require SANDAG engineers to go back to the drawing boards.

The inescapable fact is that implementing either the Purple Line Route, Blue Line Route, South Yellow Line Route or Double Track Green Route together with the Torrey Pines Road south portal and the JDB portal or Racetrack View Portal, would destroy Del Mar, its culture, property values and economy, and is too high a price to pay in pursuit of a form of transportation that does not fit the needs of the area. **The Northern Yellow Line Route** is the only current study route that circumvents homes and businesses and does not require the use of eminent domain at least affords Del Mar a path to survive the assault of realignment, **is the only acceptable alternative.**

V. Issues Specific to Del Mar Woods

These issues for Del Mar Woods remain the same as in our earlier comment letter on the previous NOP because the most impactful route was not significantly changed. The route chosen to study (Purple Line Route) still does not make the turn to follow Camino Del Mar but instead goes directly under part of the HOA. As a 126-unit condominium and townhouse complex built in the early 1970's, Del Mar Woods was not built to withstand the types of vibrations and shaking that will come with a loaded freight train or military transport train rumbling underneath it. With the location of the complex so close to the portal for the Purple Line Route, the depth of the tunnel underneath the complex will hardly be deep enough to protect the homes and their walls and foundations from damage. As we understand from discussions with your team, the portal openings must start high enough to account for sea level rise and can only proceed down at the maximum 2% grade. Your updated NOP documents show a depth of around 100 to 120 feet below the buildings. A quick investigation says that sandstone will allow vibrations to reach these buildings on a normal day, and any type of explosion would be catastrophic.

The buildings it will go under (as shown in the updated NOP maps) are three story buildings housing families and many older residents. The path also goes under the underground car park.

While these buildings have been retrofitted recently (2018) as per California code, that code did not contemplate loaded rail cars travelling under the three-story buildings or cement underground garages. Consideration must be given to the route plan impacting this large condominium complex and your engineers must take into consideration the building materials and techniques used at that time they were built. Stresses on buildings from vibration and the human health impacts are very real.

We have requested that your project team study the soil in this specific area as part of its geological work.

Del Mar Woods objects to selection of the Purple Line Route and urges the project team to consider the impact on not only the train (speed, duration of tunnel, costs, etc.) but the impact on the quality of life for residents and the structural impacts to real property and the impact on the price of many of the owner's largest (or only) asset.

VI. Additions needed to the NOP

- Vibrational impact studies specific to the materials used in 1970 construction of homes and garages. Specifically pertaining to three story buildings and underground parking.

- Circulation during construction for densely populated areas with limited ingress and egress options both for emergency services as well as daily access
- Impacts on housing prices before, during and after construction
- Funding of a separate account to pay for on-going damage (if the Purple Route is selected) for repairs to cracked foundations and underground cement parking garages due to shaking and vibrations
- Worst case scenarios from an explosive incident in a shallow tunnel under a three-story building
- Studies of potential health risks as noted earlier in this letter
- Study of an alternative route that directly follows Camino Del Mar with its slight curves versus the straight-line route depicted today – a one second difference in time is worth preservation of homes and residents' health

Conclusion

The residents of Del Mar Woods are supportive of the work SANDAG is doing to move the railroad tracks off the eroding sandstone bluffs but it believes that SANDAG has in its current NOP only one realistic alternative which will serve the purpose of track relocation and preserve the lives and the way of life for the Del Mar Woods owners and residents. **This is the Northern Yellow Line Route.**

Many comments have been made in SANDAG meetings urging the Board to take a longer view and find a long-term solution to move the tracks not only off the Del Mar Bluffs but out of all of the densely populated coastal towns and put them along the I-5 transportation corridor. That route however, is not an option in the current NOP. We urge SANDAG staff and Board to reconsider this option during the EIR process.

Thank you for your consideration.

Very truly yours,

Karen Lare

President, Del Mar Woods Homeowners Association, Del Mar, California.

Respond to: Karen.Lare@Yahoo.com

Cc: Del Mar Woods Board of Directors

Office of U.S. Congressman Mike Levin

Office of Senator Catherine Blakespear

California Coastal Commission: Attention Dr. Katherine Hucklebridge

Del Mar City Council

From: Scott Renner [redacted]
Sent: Sunday, June 15, 2025 4:06:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Del Mar Resident Train Tunnel Undergrounding Concerns

Dear SANDAG,

We are very concerned about the proposed train tunnel undergrounding project. We urge SANDAG to consider the Yellow Line as an alternative. The thought that numerous Del Mar residents will lose their homes through imminent domain if the Green, Pink, or Blue lines are settled upon is heartbreaking. Del Mar has been our home for decades, and the thought that families, such as us, could lose their homes; especially when there is a viable alternative with no loss of property, is, as stated, heartbreaking. We urge you to consider the Yellow Line as the Lossan Corridor solution to removal of the train from the Del Mar bluffs.

Sincerely,

Scott and Lisa Renner

[redacted]
Del Mar

From: Skiprichmond [redacted]
Sent: Saturday, June 21, 2025 5:32:01 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Study the Northern Yellow Line

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.

Best Regards

Skip Richmond
[redacted]
Del Mar Ca 92014

From: cyndi ringoot [redacted]
Sent: Wednesday, June 25, 2025 5:32:30 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further

issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Outlook

Reevaluate SDLRR Project

From Isaac Roberts [redacted]
Date Wed 6/25/2025 10:47 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG,

I am writing to strongly oppose the proposed Del Mar Double Track Reinforced Alternative. This plan would have devastating and irreversible consequences for Del Mar's coastal bluffs and beaches, which over a million people each year, including myself, regularly enjoy.

I have supported your efforts for years to relocate the rail line off the unstable and eroding bluffs. That's why I'm deeply concerned to see this new alternative under consideration - one that involves trenching into the bluffs and constructing seawalls along the entire 1.7-mile stretch. This would effectively destroy what remains of our natural bluff system.

Seawall armoring along the full corridor would also result in the permanent loss of the beach. These structures interrupt natural sand replenishment and block the landward migration of the shoreline, especially as sea levels continue to rise. We are already seeing how existing seawalls are speeding up erosion and narrowing the beach. Expanding this kind of infrastructure would only make the problem worse.

There is no realistic way to mitigate the destruction of these irreplaceable coastal resources. Beach nourishment is not a durable, long-term solution and often creates further problems - such as silting up nearby lagoons and disrupting ecosystems.

The Del Mar Double Track Reinforced Alternative is clearly not the least environmentally damaging option. It contradicts important policies in the California Coastal Act and sacrifices public coastal access, scenic beauty, and recreation. If you proceed with evaluating this option, you must fully assess its irreversible impacts on the bluffs and beaches, including the loss of their recreational and aesthetic value to the public.

I urge you to stay committed to your original goal: relocating the LOSSAN corridor off of Del Mar's crumbling bluffs. The tunnel routes you are currently studying offer a far more sustainable and environmentally responsible solution that can protect both the coastline and public transit access for generations to come.

Thank you for your time and consideration.

Cordially,
Isaac Roberts

From: Mary ellen Roide [redacted]
Sent: Friday, June 27, 2025 7:35:31 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Please stop this nightmare construction

I am strongly opposed to this construction. Seapoint condominium that we presently live in is our full-time residency and was going to be our retirement home. My husband is 73 and I am 68. If this happens, I don't know where we will go. Please please do not proceed with this nightmare Construction it affects so so many of us. Thank you.
Sent from my iPhone

Attachments: 9C2C6892-3A2B-47BA-AEFF-82242CBD9739.png

From: Barb Roland [redacted]
Sent: Thursday, May 29, 2025 10:30:03 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Rail route- northern yellow line

To SANDAG:

My name is Dr Barb Roland and I live in Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs andcanyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would have

severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the doorfor consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Linehas many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3) Has no negative impact on the City of Solana Beach
4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6) Eliminates expensive tunnels under private property and below sea level
7) Assumes the Fairgrounds will have their special events platform as planned
8) Allows Riverpath Del Mar to be completed as plannedwhich will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along theedge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignmentthat protects people, homes and businesses and our unique, rare and beautiful coastal environment.

From: John and Wendy Ross [redacted]
Sent: Thursday, May 29, 2025 4:20:34 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: SDLRR Project NOP

To Whom It May Concern:
Regarding the "Under Crest Canyon Alternative Route", I have the following objections:
1. Noise and vibration during construction and operation of the tunnel.
2. Potential for ground settling and subsidence in Del Mar residential residential areas.
3. Unsightly tunnel ventilation shafts in residential locations.
4. Potential for accidents involving hazardous cargo resulting in discharge of fumes through tunnel ventilation shafts.

Thank you for your consideration,
John Ross
[redacted]
Del Mar

cc: Mayor Terry Gasterland

From: Sudeepto Roy [redacted]
Sent: Thursday, May 29, 2025 8:16:15 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Valérie Dufort-Roy [redacted]
Subject: Support for the "Northern Yellow Line"

Dear SANDAG,

My name is Sudeepto Roy, and I live in Del Mar. I urge SANDAG to study a new rail alignment that serves Del Mar, Solana Beach, and the Fairgrounds without displacing residents, harming businesses, or damaging our beaches, bluffs, and canyons. The four routes currently listed in the May 15 NOP are deeply problematic, but the mention of a potential fifth option—a more northerly alignment—offers a promising alternative.

I support the "Northern Yellow Line" (NYL), which avoids impacts to homes and businesses, preserves sensitive coastal environments, and could reduce project costs by up to a billion dollars. Running along the southern edge of the Fairgrounds and crossing the San Dieguito Lagoon near I-5, the NYL minimizes tunneling, avoids portals near homes, and aligns with public land. It also supports planned infrastructure like the Fairgrounds platform and Riverpath Del Mar. I urge SANDAG to fully evaluate this route as a viable, community-friendly solution.

Sincerely,
Sudeepto Roy
Del Mar, CA 92014

Figure 3. Four Project Alternative Alignments

From: Jim Royer [redacted]
Sent: Wednesday, June 25, 2025 6:04:47 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Jim Royer
[redacted]

San Diego, CA 92117

Outlook

SDLRR Project NOP

From Jim Royer [redacted]
Date Wed 6/25/2025 11:04 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the

Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Jim Rover
[redacted]
San Diego, CA 92117

From: Ben Rubenson [redacted]
Sent: Wednesday, June 25, 2025 5:06:12 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

Ben Rubenson

From: Craig Rubin [redacted]
Sent: Friday, June 27, 2025 2:59:04 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train tracks

Dear Sandag,

There are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration. Thank you.

Craig Rubin
San Diego Resident

From: Cristina R [redacted]
Sent: Wednesday, June 25, 2025 6:09:18 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Pink and Green Line

There are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration. Thank you.

Mia Rubin
Sent from my iPhone

Outlook

SDLRR Project NOP

From Morgen Ruby [redacted]
Date Mon 6/30/2025 9:29 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Morgen Ruby

From: Avram Sachs [redacted]
Sent: Wednesday, June 25, 2025 4:58:36 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear Madam or Sir,

Please, the natural beauty of the California coast is essential to the California experience. The train must move inland, and no permanent damage to the bluffs made.

Sincerely,

A. Sachs

From: Anar Salayev [redacted]
Sent: Monday, June 30, 2025 4:58:09 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project

area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Anar S

From: Anar salayev [redacted]
Sent: Monday, June 30, 2025 4:58:17 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Anar S

From: Nadia Salazar [redacted]
Sent: Wednesday, June 25, 2025 8:14:12 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

Sincerely,

Nadia Salazar

From: DANIEL SALTICH [redacted]
Sent: Monday, June 30, 2025 8:20:37 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SANDAG

To Whom it may concern,

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Sincerely,

Dan Saltich
Del Mar property owner

Outlook

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the train project

From Diane Salyer [redacted]
Date Mon 6/30/2025 9:02 AM
To LOSSAN Comments <LOSSANcomments@sandag.org>

To whom it may concern:

Moving the train off the bluffs in Del Mar is an absolute necessity. That is surely a given.

Moving it to the I 5 corridor is also surely a given to anyone who looks at the location that wil have the least environmental and community impact.

Please please be sensible and plan the move to align with a current transportation corridor.

Sincerely,

Diane Salyer
[redacted]
Del Mar 92014

From: Lee A. Samango [redacted]
Sent: Friday, June 27, 2025 11:17:37 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

We are vehemently opposed to the tunnel being underneath our property (135 Spinnaker Court).

This is a major safety issue in addition to the following:

Air Quality will deteriorate. Instead of ocean breezes, residents living near the portal will suffer volumes of fumes and pollution from diesel output and other concentrated Greenhouse Gas Emissions spewed from the ventilation systems close to their homes.
○ Virtually continuous Noise of the ventilation systems and both Noise and Vibration of continuous freight and passenger trains descending and traveling right under their homes.
○ Potential foundation and wall stability issues due to the vibration of the freight trains fully
loaded traveling under homes. Homes in this area were not built with this type of vibration in
mind.
○ Continuous Noise of trains entering and exiting the portal.
○ Long term negative health effects shown to be associated with living near trains including
loss of sleep, asthma, higher rates of heart disease, stroke, anxiety, increased numbers of
children with learning disabilities.
1
○ The risks of carrying Hazardous Waste under their homes.
1 Scientific American: Excessive Noise Raises the Risk of Heart Disease in Adults and Learning Deficits in Children
https://www.scientificamerican.com/article/everyday-noises-can-hurt-hearts-not-just-ears-and-the-ability-to-learn/
Harvard Health Publishing: Noise exposure/ risks of cardiovascular problems
https://www.health.harvard.edu/staying-healthy/noise-exposure-may-raise-risks-of-cardiovascular-
problems#:~:text=Each%20four-

decibel%20increase%20in%20noise%20over%20a%20baseline,rate%2C%20and%20blood%20vessel%20narrowing%2C%20study%20authors%20said.

4○ The Hazard risk of derailment close to and under their homes (the FRA reports more than
700 train derailments in 2023 alone).

○ Eminent domain taking, and if not taken, a dramatic drop in property values and the inability
to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above.

• In addition to the decline in quality of life experienced by residents in the immediate vicinity of the
Torrey Pines Rd. portal, the Del Mar Community as a whole would suffer:

○ The loss of much of the aesthetic benefits of an iconic scenic location where Torrey Pines
Beach first comes into view driving or walking south from 4th Street to Torrey Pines State Beach.

○ Elimination of pedestrian and bicycle paths during construction.

○ The defacing of an iconic site by construction of industrial buildings used to house emergency ventilation equipment and of offices desired by the rail operation entities (See
2023 SANDAG Tunnel Analysis Report).

○ Blockage or impeding during construction (and likely after) the access to one of the main
routes in and out of Del Mar and the fastest route to several Scripps Hospitals on Torrey Pines Road. Construction will serve as a major impediment during rush hours when many
people use the Torrey Pines Road route to bypass the I-5.

○ The delivery of Emergency Public Services will be impeded or blocked.

○ Eminent Domain taking or loss of businesses along Carmel Valley Road, some of which
have been there for decades.

○ All of the detriments to Del Mar's residents discussed above.

○ The loss of additional square meters of environmentally sensitive lagoon acreage with double tracks and a raised berm running through the middle of the Los Penasquitos Lagoon.

From: Sally Sandler [redacted]
Sent: Saturday, June 28, 2025 1:58:36 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: No to re-routing near Torrey Pines State Beach

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

From: Ashley Sandoval [redacted]
Sent: Thursday, June 26, 2025 7:27:48 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Sent from my iPhone

From: Ashley Sandoval [redacted]
Sent: Thursday, June 26, 2025 7:27:44 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further

issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Sent from my iPhone

From: Ashley Sandoval [redacted]
Sent: Thursday, June 26, 2025 7:27:51 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Sent from my iPhone

Attachments: Community Letter to SANDAG.docx

From: Jonnell Agnew [redacted]
Sent: Thursday, May 29, 2025 7:33:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Emailing: Community Letter to SANDAG

Please take the time to read my attached letter. The homeowners of property in Del Mar urgently need your attention to this alternative route. Please let me know you have read this letter.

Sincerely,

Jonnell Agnew,
[redacted]
Del Mar, CA 92014

Your message is ready to be sent with the following file or link attachments:

Community Letter to SANDAG

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

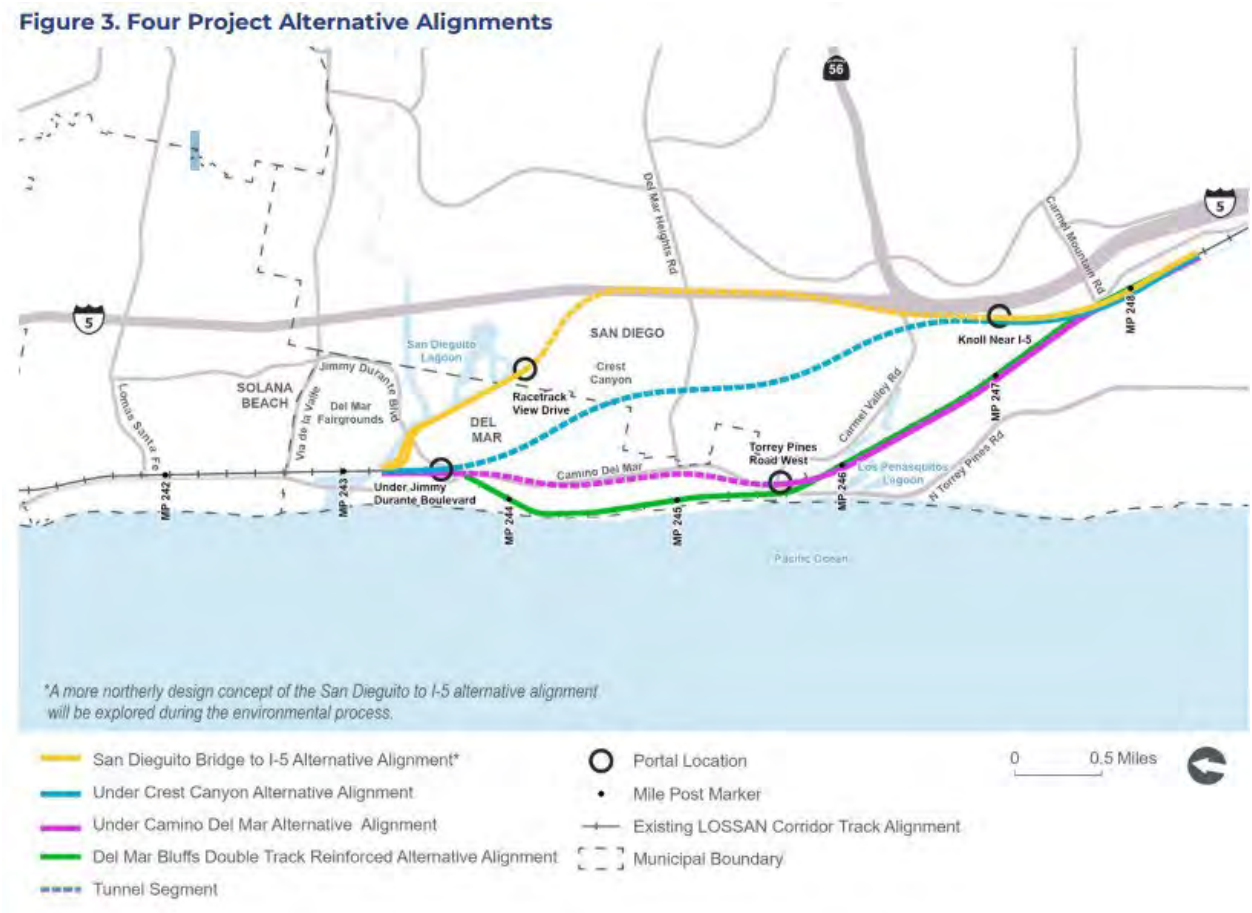
May 28, 2025

Dear Friends and Neighbors:

On May 15, SANDAG released their Notice of Preparation ("NOP") for the Environmental Impact Report ("EIR") showing four alternative rail alignments. The purpose of this letter is to ask for your support for a specific fifth realignment route to be studied in the EIR. This fifth alignment is referenced but not outlined in the NOP.

The SANDAG NOP can be found at the following link and contains the Figure 3 map below:

https://www.sandag.org/projects-and-programs/featured-projects/lossan-corridor-improvements/-/media/1F260CF9385B4A1482685161BA7BB20A.ashx



These four proposed rail alignments are all extremely unsatisfactory for a number of reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. Two of the realignments place huge, air-polluting portals near the coast, homes and the Fairgrounds. The green route that proposes double tracking on the bluffs would destroy Del Mar's coastal bluffs and beaches and contravenes an agreement with the Coastal Commission. All non-bluff routes and the bluff-top double-tracking route will require either direct eminent domain taking of homes and businesses or impose diminution of value and adverse impact on quality of life.

However, SANDAG has added one possible alternative (with an asterisk) on their drawing, noting that – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process." Indeed, SANDAG staff committed to developing this route to the same level as their other proposed routes.

This "northerly design concept" is called the "Northern Yellow Line" (NYL) here and was conceived by residents and businesses, who are working together to find an alternative rail route that eliminates or greatly reduces the adverse impacts of realignment on neighborhoods and businesses, while still meeting the needs of passengers and rail stakeholders. The NYL route was first presented to SANDAG engineers and management on February 18th at a Del Mar City Council meeting and communicated to SANDAG staff by email. The route has also been presented at SANDAG board meetings and will be formally submitted in response to the May 2025 NOP. The NYL route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

Your Support for the "Northern Yellow Line" Is Needed

In response to questions from the Board and the public, at the February 28, 2025 SANDAG Board meeting, SANDAG's CEO committed to study this route as part of the EIR, but residents and businesses need to show their support for the study of the Northern Yellow Line in writing and in person before our window of opportunity to comment on the May 2025 NOP closes on June 30, 2025.

SANDAG is seeking input on the Draft EIR scope, including the alternative alignments that will be under consideration and potential environmental impacts. A public scoping meeting is scheduled on May 29, 2025, from 6:00 to 7:30 pm at the Sound at the Del Mar Fairgrounds. Written comments should be addressed to SANDAG, 1011 Union Street, Suite 400, San Diego, CA 92101, ATTN: LOSSAN Comments and sent via email with subject line "SDLRR Project NOP" to: LOSSANcomments@sandag.org; Also, see this webpage for additional details: https://www.sandag.org/railrealignment

Comments may also be provided orally (and then transcribed) or in writing at the public scoping meeting. In addition, comments can be submitted online here: https://engage.sandag.org/lossan-rail-realignment

We seek your support for objective study of the Northern Yellow Line. A strong, unified response to the NOP during the comment period is the most important action that Del Mar residents, apartment owners and businesses can take at this time. **We're offering an email template below that anyone can adapt and personalize and submit to SANDAG before June 30th.**

Thank you for taking action!

Coalition for Safer Trains

To SANDAG:

My name is Jonnell Agnew Sanford and my husband Thomas C. Sanford and we live at [redacted] in Del Mar, California and we oppose any tunnelling under Camino Del Mar or tunnelling under Crest canyon.

SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

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The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

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1) Has no negative impact on ANY homes or businesses in Del Mar
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I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

This is the preferred realignment that I agree should be the one Sandag uses.

Please listen to our reasons why this is the best route to take.

Sincerely,

Jonnell Agnew Sanford and Tom Sanford

Attachments: Community Letter to SANDAG.docx

From: Jonnell Agnew [redacted]
Sent: Thursday, May 29, 2025 7:35:34 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Emailing: Community Letter to SANDAG

Sent again with my signature.

Jonnell Agnew,
[redacted]
Del Mar, CA 92014

Your message is ready to be sent with the following file or link attachments:

Community Letter to SANDAG

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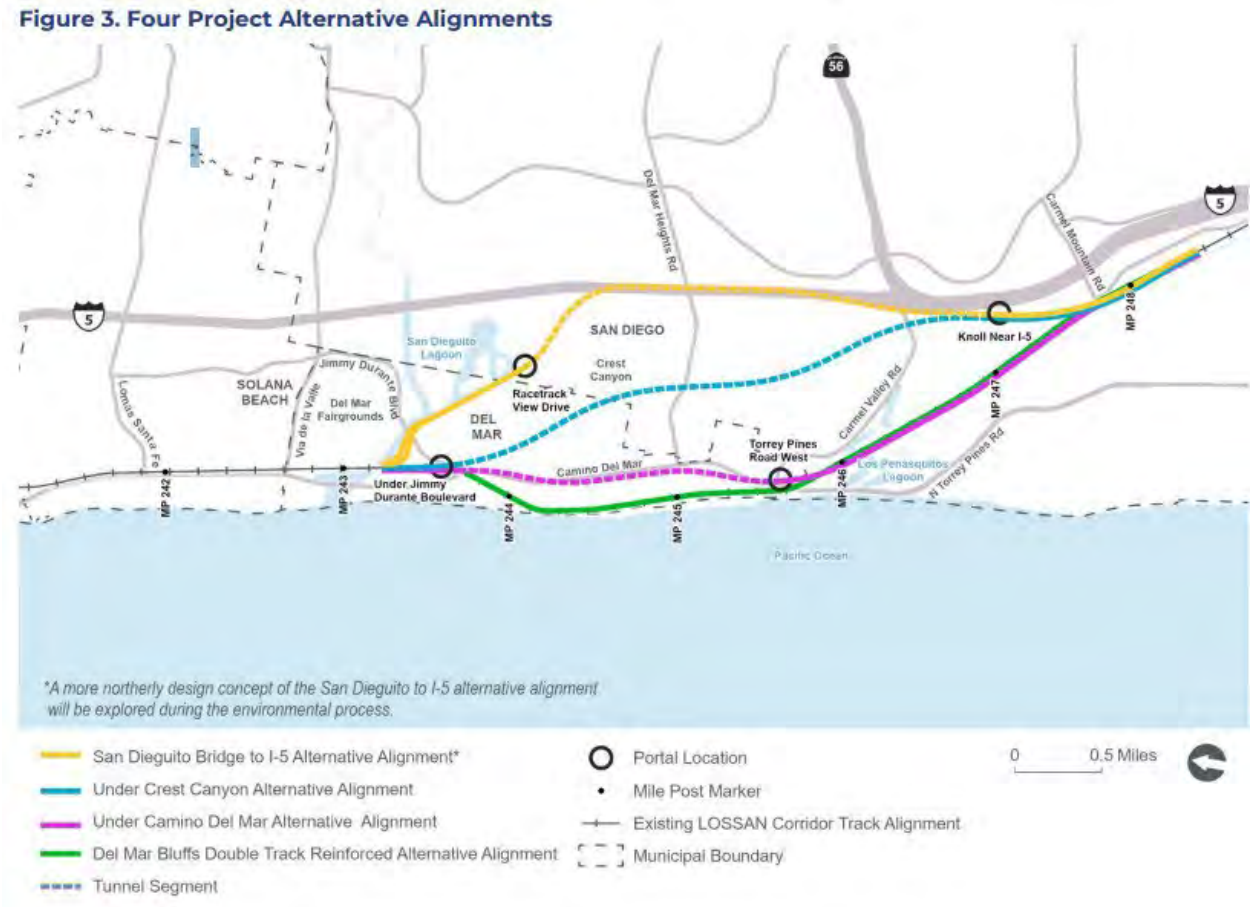
Figure 3. Four Project Alternative Alignments



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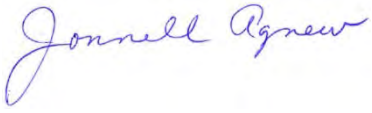
Sincerely, 

Jonnell Agnew Sanford and Tom Sanford

From: Deborah Saracini [redacted]
Sent: Friday, June 27, 2025 6:54:50 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Remove Pink and Green Line Routes From Further Consideration

Good Afternoon,

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you!

Deborah Saracini
(Sea Point Resident since 2001)

From: Nina Sasso [redacted]
Sent: Wednesday, June 25, 2025 9:56:26 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR.

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution.

I have had the privilege of living in many other parts of the world, including Japan, which has one of the most efficient and reliable train systems in the world. As a San Diego native, I can't help but feel that our own rail system here is disappointingly behind the curve in terms of maintenance and reliability. I am a frequent passenger on the Coaster and have been inconvenienced on numerous occasions by the service outages due to bluff work. I worry that if the rail is allowed to remain on the bluffs, it will only fall even further behind the curve and cause significant damage to our coastlines and require nonstop spending to continually prop up the rail as the bluff erodes. I think the best thing for San Diego is to move the rail inland to further advance and develop our rail system and safeguard our irreplaceable natural coastline.

Thank you for your time and consideration,
Nina Sasso

From: Kristin Schaeffer [redacted]
Sent: Monday, June 30, 2025 8:43:52 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Realignment Issues

Hi,

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you
Kristin Schaeffer

From: Dianah Schmidt [redacted]
Sent: Friday, June 27, 2025 7:22:32 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Resident and homeowner opinion - opposed to Pink and Green Line routes

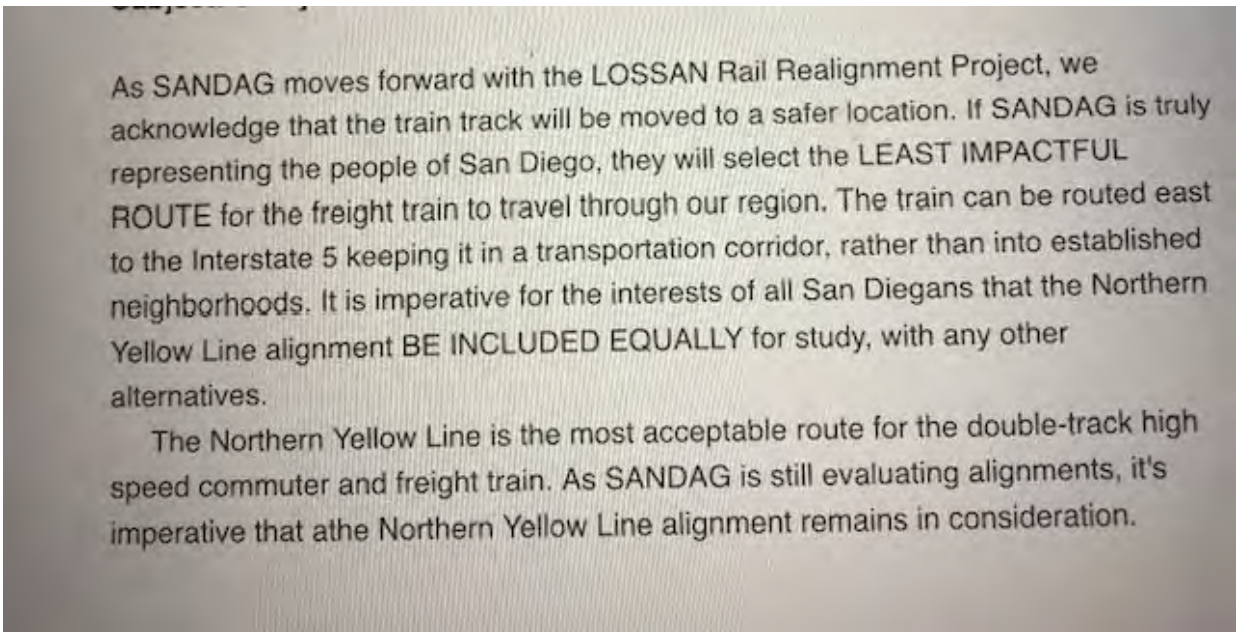
Dear SANDAG -
I am a resident of Del Mar and want to voice my strong opposition to the potential Pink and Green Line routes for trains.
The issues with the Pink Line and Green Line routes are many and are significant:

1. Environment
    - these routes would have a significant and damaging impact on the local environment, particularly the Los Penasquitos Lagoon and the Torrey Pines areas
    - Wildlife would be disturbed by the construction and by the ongoing escalated presence of train traffic
2. Community
    - the pink and green line routes would have a significant negative impact on our community, lifestyle, quality of life
    - the pink and green line routes would have a major negative impact on our property values
3. Superior alternatives are available - Yellow and blue line routes
    - the I-5 Knoll along the yellow and blue line routes is a far superior location for the southern tunnel portal. It would not have the negative impact on the lagoon / Torrey Pines State Park environment, and would not have the negative impact on nearby homes.

Please cease with pursuit of the pink and green line routes. Please move forward with the yellow and blue line route options.
Thank you for your consideration.
Dianah Schmidt
Homeowner / Del Mar resident
[redacted]
Del Mar, CA. 92014
dianahsvoa@gmail.com

From: Susan Schneider [redacted]
Sent: Saturday, June 21, 2025 8:22:24 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Northern Yellow Line must be the choice for Del Mar

This is why it must be inclusive ded:



As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.

Susan Schneider
[redacted]
Del Mar, Ca

From: Melanie Schoenbachler [redacted]
Sent: Wednesday, June 25, 2025 5:05:09 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN,

I wholeheartedly concur with Surfrider, the Coastal Commission, California State Parks, and the beachgoing public: the Del Mar Double Track Reinforced Alternative must be eliminated from consideration in this Draft EIR. As stated in your own documentation, this option necessitates bluff stabilization and new seawalls, directly violating Coastal Act Section 30253(b).

This alternative presents permanent, irreversible damage to Del Mar's bluffs and beaches, inevitably leading to complete beach loss as sea levels rise. Furthermore, maintaining the rail on the bluffs will become increasingly difficult, costly, and ultimately infeasible. Even the most advanced engineering cannot indefinitely withstand the ocean's power. While initial costs may seem lower than tunneling, the long-term expenditures to combat erosion, extreme weather, and rising sea levels would likely be far greater. Should this option not be removed from the EIR, its full potential costs and the irreversible impacts on the bluffs, beaches, and public access must be thoroughly and transparently analyzed.

Relocating the train away from the bluffs is demonstrably the sole sustainable, long-term solution for the LOSSAN corridor's continued operation and success. I strongly urge you to prioritize rail relocation.

Thank you for your careful consideration of these critical points.

Outlook

SDLRR Project NOP

From Sarah Scott [redacted]
Date Wed 6/25/2025 10:46 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.
Sarah Scott

Attachments: Screenshot 2025-06-26 061030.png

From: Tate Scott [redacted]
Sent: Thursday, June 26, 2025 2:01:00 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Gobsmacked by the Yellow Route – Choose a Smarter, Kinder Rail Alignment

Subject: Gobsmacked by the Yellow Route – Choose a Smarter, Kinder Rail Alignment

Dear SANDAG Planners,

I've lived in Del Mar and Carmel Valley for nearly 50 years. I raised a son here. My wife and I chose our home on Oribia because of the preserved open space surrounding it—Crest Canyon and the San Dieguito Lagoon. We enjoy the trails, the wildlife, and the rare quiet that defines this part of Del Mar. The proposed Yellow Engineering Alignment leaves us gobsmacked.

Routing a raised train and tunnel portal through this peaceful, ecologically vital corridor would be devastating—not just to the habitat, but to the people who live nearby. These wetlands and canyonlands are not vacant land—they are protected ecosystems, home to migratory birds, native vegetation, and a fragile peace that residents deeply value.

The construction impact alone would be overwhelming. Our neighborhood has only one way in and out: Racetrack, San Dieguito, and Oribia. These are narrow, residential roads never intended to support tunnel boring, heavy construction traffic, or bridge assembly. Access for residents, emergency vehicles, and services would be compromised for months or even years.

Del Mar itself has only four ingress and egress routes. That limited access means any construction-related blockage, emergency, or maintenance effort affects not just one neighborhood—but the safety and function of the entire city. In fact, the impact on the tourist and property tax-based economy may bankrupt the City.

But construction is only the beginning.

The long-term consequences of an elevated train and tunnel portal would leave a permanent scar. Ventilation systems, emergency access points, and ongoing maintenance would generate persistent noise and traffic through what is now a quiet canyon. All of it would be funneled through the same fragile road network—already inadequate for this scale of infrastructure.

There is a better alternative:
The Northern Yellow Route.
It avoids homes. It protects open space. It enhances fairground access and walkable regional connectivity—without destroying neighborhoods or compromising natural corridors. It is clearly the best solution.

SANDAG has a rare opportunity to demonstrate modern, responsible infrastructure planning. Please don't let short-term engineering convenience override decades of environmental protection, thoughtful community design, and public trust.

Attached is a map showing our home's proximity to the proposed alignments, including the Yellow Route's impact on Crest Canyon and the estuary. It illustrates just how close —and just how damaging—this route would be for our home and our neighborhood.

Respectfully,
Tate Scott
[redacted]
Del Mar, CA 92014

Ocean Front
Coast Boulevard
Santa Fe Avenue
S21
Zuni Drive
Lunera Drive
Del Ma
Stratford Court
Pacific Lane
Ocean Avenue
Racetrack View Dr
San Diego Freeway
5
Mango Way
Crest Canyon
Open Space
Park

Attachments: CandaceLeedsSears_TT_Blue.png
lux sig.png

From: Candace Sears [redacted]
Sent: Monday, June 30, 2025 10:52:07 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Tunnel Under Del Mar

Dear Sandag,

The proposed tunnel under Del Mar makes absolutely no sense and as life long Del Martians we are totally opposed to such a notion. For one, it is far easier and most cost effective to go above ground with a monorail type train much as the trolley has been constructed only better. Disney accomplished this in the 1950's so the technology and engineering is readily available. A true high speed train connecting to Los Angeles should be the goal which is a transportation necessity. It makes the most sense environmentally which would save the 300 million already allocated for that-studies which will fail as there are species and wildlife and habitats to prohibit any kind of approval. This is common knowledge. The 300 Million is a total waste of money. Drilling through the sandstone of Del Mar which is like digging through glitter will simply not work and the destruction to property as well as eminent domain should never be considered when alternative options are available. The destruction of one of California's most vibrant towns aka Del Mar is ludicrous. The TGV in France is a prime example of successful transit and totally doable via a monorail system. Further this proposal's destruction doesn't make any sense since it only goes a short distance when it hits San Clemente with the same problem. Any train system needs to be over the existing freeway or alongside off the cliffs throughout coastal California. It is reminiscent of the "train to nowhere" in northern California which has cost billions and achieved no objective and never will.

Specifically, there are major problems with the Pink Line and Green Line routes and no one in the community supports them. The only consideration of any underground tunnel should be the I-5 Knoll location for the southern portal which has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer money. We encourage Sandag to remove the PInk Line and Green Line routes from further consideration. We also strongly encourage the exploration of an above ground transit system as outlined above which solves all problems, especially in light of the tracks remaining on the cliffs for other concerns anyway. We strongly urge Sandag to "do the right thing" and not destroy so

many peoples' lives and homes. It is too big of a price to pay for a train to nowhere costing billions in the final analysis.

THE SEARS GROUP

Pacific Sotheby's International Realty
Candace Leeds-Sears
Broker Associate

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candace.sears@pacificsir.com
www.surfandturfproperties.com
16915 Avenida de Acacias
P.O. Box 1023
Rancho Santa Fe, CA 92067
DRE#: 00638662

Attachments: image001.png

From: Cody Sears <csears@rhinoinc.com>
Sent: Monday, June 30, 2025 10:49:49 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train

To Whom it May Concern.
I have lived in Del Mar next to the Train Tracks and Torrey Pines Bridge since 1978, and I can tell you the bluff and cliff cannot handle another 100 years of train travel. The sand and fragile bedrock will not with stand anymore strain due to the location of the terrain, it is just not designed for tunnel drilling and more train traffic. The I -5 knoll location is the commonsense approach not only for the environment but for the long term no matter what the cost. The more inland the better due to the fact this train track will be in use for a very, very long time.

Sincerely,

Cody

Cody G. Sears
President
RHINO BUILDING SERVICES INC.
6650 Flanders Drive, Suite K
San Diego, CA 92121
O: (858) 455-1440
M: (619) 980-0673
F: (858) 455-1141
csears@rhinoinc.com
www.rhinoinc.com

From: Donna Shaw [redacted]
Sent: Wednesday, May 28, 2025 4:53:31 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Comments on railroad relocation

Hello,

I **fully support** moving the train tracks to the **I-5 freeway**, but do **NOT** support going under homes or through the business district (under Camino Del Mar) in Del Mar.

Retaining the tracks on the bluff ***may*** be possible, but only if there has been a new environmental impact evaluation assessing whether that option would be environmentally feasible.

Thank you for this opportunity to make a comment.

Donna Shaw
Del Mar, CA 92014

From: Donna Shaw [redacted]
Sent: Sunday, June 22, 2025 1:01:55 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: New Northern Yellow Route

Upon careful review, I see that the Northern Yellow Route will be the best route for all parties; no eminent domain, no businesses impacted, the Fairgrounds won't object, and the lagoon habitat will be preserved. Please carefully consider this route for the trains.

Respectfully submitted,
Donna Shaw
Del Mar

Attachments: M_Shulman SANDBAG.docx.pdf

From: Mckenzie Shulman [redacted]
Sent: Thursday, June 26, 2025 4:03:55 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments; Clerk of the Board; senator.blakespear@senate.ca.gov; assemblymember.boerner@assembly.ca.gov; JoeLaCava@sandiego.gov; Gaasterland@gmail.com
Subject: letter to SANDBAG

Hello,

Please see my letter below as a resident of [redacted] Ocean View Avenue, Del Mar, CA.

Thank you!

Warmly,
McKenzie Shulman

Attn: Clerk of the Board

SANDAG

401 B Street, Suite 800

San Diego, CA 92101

June 26, 2025

Dear Honorable Members of the Board of SANDAG,

The Board's attention to the future of regional transportation is deeply appreciated.

After reviewing the current report and options, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment. The following points explain why this is the best option available.

With climate change, resilience over 100 years means avoiding sea-level threats—only the I-5 option provides that.

No modern planner would choose to bisect a sensitive area like the Los Penasquitos Lagoon.

The I-5 option also minimizes eminent domain and harm to Del Mar neighborhoods and businesses.

The western options all necessitate destructive new construction within protected habitat.

While no alignment is perfect, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, and least disruptive solution. Please act decisively to preserve our ecosystems, protect communities, and secure the future of Southern California's critical rail infrastructure.

Sincerely,

Mckenzie Shulman

[redacted] Ocean View, Del Mar, CA 92014

From: Jonathan Sills [redacted]
Sent: Thursday, June 26, 2025 3:09:22 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Tritt, Ross [redacted]
Subject: SDLRR Project NOP

Dear SANDAG,

I am a homeowner in both Solana Beach and Del Mar and a 20+ year resident of the area who has followed the realignment effort since last year's NOP. Thank you for the May 29 scoping session and the comprehensive Value Analysis report; both were very helpful.

My request is straightforward: before the region commits billions, please give the public a clear, apples-to-apples picture of how the four build alternatives – and continued bluff stabilization – compare on cost, risk, and community impact. Given the complexity of this project and its significant impacts on coastal communities, transparent and technically rigorous analysis is essential. I respectfully ask that the Draft EIR include:

1. Reference-class & scenario analysis
Run a formal reference-class forecast (RCF) for each alternative – tunnel and non-tunnel – using data from recent California bored-tunnel projects (Sepulveda Transit Corridor, Caltrain Downtown Extension, BART upgrades) and comparable rail megaprojects nationwide. Please publish the spread between conventional bottom-up estimates and the RCF so taxpayers can see the full cost-risk envelope.

2. Live digital-twin modeling
Civil 3D is a solid start, but will the team extend those models into a modern digital twin platform that can simulate lifecycle costs, schedule uncertainty (including tunneling contingencies), climate resilience, and construction disruption? Such platforms (e.g., Autodesk Tandem, InfraWorks, or comparable tools) should be used for scenario testing prior to plan approval, construction management during the build phase, and real-time monitoring with predictive maintenance capabilities for ongoing operations. This cost of appropriate software and modeling is likely a tiny fraction of the total budget contemplated. Finally, if another toolset is chosen, please outline its capabilities relative to Tandem/InfraWorks and explain why that approach is adequate for a project of this scale inclusive of the risks specific to a large bored tunnel project through a coastal residential area.

3. Cost-benefit analysis: Continued bluff stabilization plus Del Mar Bluffs Double Track Reinforced Alternative Alignment vs. tunnel alternatives
Phase 5 delivers a 30-year design life for roughly $88 million (per the update provided by SANDAG to San Diego APWA on May 9, 2024). Please compare the net-present cost, greenhouse-gas profile, and service resilience of "Phase 5 stabilization plus the Del Mar Bluffs Double Track Reinforced Alternative Alignment" with each tunnel alternative (San Dieguito Bridge to I-5, Under Crest Canyon, Under Camino Del Mar). Include the Coastal Commission's sea-level-rise guidance and a high-end RCP 8.5 scenario with performance evaluation through 2080 and 100-year flood scenarios so the trade-offs are clear.

4. Construction & neighborhood disruption
For every build option, quantify truck trips, haul routes, night work, noise, and air quality impacts – then map hotspots so residents can see who bears the burden and for how long. Investigate whether a dynamic mapping tool can be made available via the web as a supplement to any static references that are published, ensuring accessibility for residents with visual impairments and those requiring language translations.

5. Public accountability
How will comments received by the June 30 deadline – including the requests above – be addressed in the Draft EIR? A plain-language table ("Comment → where in DEIR [chapter/page]") would go a long way toward building trust.

Thank you for your hard work and for the continued opportunity to participate.

Sincerely,
Jonathan Sills
Solana Beach, CA

From: PAMELA SLATER-PRICE [redacted]
Sent: Friday, June 13, 2025 4:24:19 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Please include the Northern Yellow Alignment in the NOP study alternatives.

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.

Pamela Slater Price
Del Mar.

Sent from my beautiful new iPhone 16 Pro Max

Attachments: 38654080-1A44-43BD-9EA5-5E4C385A757A.png

From: PAMELA SLATER-PRICE [redacted]
Sent: Monday, June 30, 2025 2:26 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: Northern Yellow Alignment must be studied in EIR

To SANDAG:

My name is Pamela Slater Price and I live in Del Mar.

SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, canyons and lagoons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, canyons and lagoons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible alternative as an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The NYL route is described briefly as follows:

From the southern edge of the special events platform, the Northern Yellow Line turns east and runs along the southern edge of the Fairgrounds property rising in elevation until it reaches Jimmy Durante Blvd. It then crosses over Jimmy Durante Blvd on an elevated bridge and continues eastward across the southern edge of the Del Mar Golf Driving Range which is part of the Fairgrounds property (north of the San Dieguito Lagoon) until it crosses the lagoon on a bridge just west of the I-5. It then heads south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" is not a viable alternative because it does not satisfy the project objectives. This alignment concept was rejected after 2017 environmental studies revealed that this route would destroy Tier 1 protected habitat in the San Dieguito Lagoon. It would also destroy the planned Riverpath Del Mar connection between the Coast to Crest trail and the Crest Canyon trail. The Value Analysis statedone of the stated project objectives is to "Avoid and/or minimize negative effects ...(on)... publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges...." The SANDAG "yellow line" route fails to meet this goal.

Another important project objective is to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow route shown on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The SANDAG "yellow line" route fails to meet this goal.

However, SANDAG Staff's recommendation of a route with a turn as it heads east to the I-5 does open the door for consideration and analysis of less expensive and less destructivenearby routes. The "Northern Yellow Line" (NYL) has many advantages that the SANDAG "yellow line" (and the other study routes) lacks. It also could cost a billion dollars less than the other recommended routes because fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed “Northern Yellow Line” route offers the following advantages. It:

1) Preserves the San Dieguito Lagoon and restores the Penasquitos Lagoon
2) Has no negative impact on the City of Solana Beach
3) Has no negative impact on ANY homes or businesses in Del Mar
4) Has no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5) Runs entirely along the edge of state-owned property.
6) Eliminates expensive tunnels under private property and below sea level
7) Assumes the Fairgrounds will have their special events platform as planned
8) Allows Riverpath Del Mar to be completed as plannedwhich will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon
9) Allows for the future dismantling of the rail bridge currently in the Los Penasquitos Lagoon.

One of the stated benefits of the Fairgrounds Special Events Platform is the improvement of traffic and emissions. Less traffic means fewer parking spaces will be needed in the Fairgrounds parking lot. This extra space can be used for the railroad. Protecting homes must be prioritized over protecting a parking lot or a golf driving range.

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the railroad that protects people, homes and businesses and our unique and rare and beautiful coastal environment.

Sincerely,

Pamela Slater Price

San Diego County Supervisor 1992-2013

Del Mar

Sent from my beautiful new iPhone 16 Pro Max

From: Brian Smith
To: LOSSAN Comments
Subject: Lossan Comments: Comment on Green Line and Pink Line
Date: Monday, June 30, 2025 2:52:43 PM

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds.

Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you,

Brian Smith
Del Mar

From: Vicki Smith [redacted]
Sent: Monday, July 7, 2025 3:39:03 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Strong Opposition to the Pink and Green Plans – Ecological Consequences Cannot Be Ignored

Strong Opposition to the Pink and Green Plans – Ecological Consequences Cannot Be Ignored

There are **serious and well-documented concerns** with both the **Pink Line** and **Green Line** route proposals. These routes would cause **significant environmental damage**, threatening sensitive habitats, open space, and vital ecosystems. In addition to their ecological impact, these routes **lack public support** and have been met with strong opposition from local residents and environmental organizations alike.

In contrast, the **I-5 Knoll location** for the southern portal has garnered **broad support from both the environmental community and local stakeholders**. It presents a far more viable and sustainable option.

Continuing to allocate time and resources to analyzing the Pink and Green Line routes, despite clear environmental red flags and community resistance, represents a **misuse of taxpayer funds** and a disregard for public input.

We strongly urge decision-makers to **remove the Pink and Green Line routes from further consideration** and prioritize alternatives like the I-5 Knoll that align with ecological integrity and community values.

Thank you.

Vicki

From: Mila S [redacted]
Sent: Wednesday, June 25, 2025 6:38:57 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

The choices you make will affect both the people and environment of Del Mar. YOU have the choice to make that a positive effect.

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.
Mila Spengler
San Diego born and raised.

From: Kathleen Steindlberger [redacted]
Sent: Sunday, June 29, 2025 11:53:47 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced
Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).
The negative impacts to Del Mar%2��s bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise.
Even the best engineering will ultimately succumb to the ocean%2��s power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme
weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access
to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Have the fortitude
to do the right thing and move the train off the Del Mar bluffs. Set an example for other jurisdictions to honestly face up to consequences of making poor, short term decisions. Planning agencies are formed for exactly this reason - to plan for the future.
Thank you for considering my comment.

Yahoo Mail: Search, Organize, Conquer

From: Erin Stelzer [redacted]
Sent: Saturday, June 28, 2025 1:40:37 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Erin Stelzer
California Beach Resident and Coaster Train Rider

From: Patrick Steusloff [redacted]
Sent: Friday, May 30, 2025 11:32:43 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: SDLRR Project NOP

To the SANDAG team,

I'm a local resident writing to urge you to seriously consider an alternative rail alignment that better serves our communities and protects the environment we all value so deeply. The relocation of the tracks off the Del Mar bluff is essential, but the proposed routes outlined in the May 15th NOP fall short of meeting the needs of residents in Del Mar, Solana Beach, and surrounding neighborhoods.

Each of the four routes currently listed in the EIR study poses serious concerns — whether it's the displacement of homes, the disruption of local businesses, or lasting damage to beaches, coastal bluffs, and canyons. These are simply not acceptable trade-offs.

That's why I support what many residents are calling the "Northern Yellow Line." While it's only briefly mentioned in the NOP with an asterisk, this route deserves thorough and formal analysis as a viable option.

In broad terms, the Northern Yellow Line would run from the new special events platform at the Fairgrounds, along the southern edge of the Fairgrounds property, above Jimmy Durante Blvd, and then eastward — crossing the San Dieguito Lagoon and passing under I-5 before emerging near Carmel Valley Road. This alignment avoids residential neighborhoods, preserves sensitive natural habitats, and significantly reduces the need for costly tunneling or property acquisition.

Compared to the routes currently under study, the Northern Yellow Line offers a number of clear advantages:

- No displacement of homes or businesses in Del Mar or Solana Beach
- Minimal impact on the Fairgrounds, with any land use limited to state-owned property
- No portal locations near residential areas, the coast, or the Fairgrounds
- Avoids tunnels under or near homes, which would otherwise raise serious environmental and safety concerns
- Enables completion of Riverpath Del Mar, providing an important recreational and ecological link from Coast to Crest

Importantly, this option could also be significantly less expensive — potentially saving upwards of a billion dollars due to reduced need for tunneling and eminent domain actions.

I sincerely hope that SANDAG follows through on its commitment to fully study this northern alternative. A smarter, less destructive, and more community-oriented route is not only possible — it's necessary. Thank you for your consideration.

Sincerely,

Patrick Steusloff
Del Mar resident

From: Stephen Stewart [redacted]
Sent: Wednesday, June 4, 2025 12:30 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: SANDAG, Attn: LOSSAN Comments

SANDAG needs to get this plan finalized and in place ASAP. Seems there has been back tracking lately with not a reduction in options but an increase in options... going the wrong direction. This is a critical corridor not only for the region but even for national security (DoD transportation). Keeping the tracks on the bluffs would be a major setback that doesn't address this inevitable problem of cliff erosion. Putting any more funds to lengthening the tracks on the bluffs is very short cited.
I fully support the 'Under Camino Del Mar Alternative Alignment'. It is the most direction option with less environmental impact to the wetlands while moving the tracks off the bluffs.
Please spend these precious funds wisely and get this critical national infrastructure fixed so it can be relied upon for many decades to come.

Stephen Stewart

From: c.mccue stockton [redacted]
Sent: Thursday, June 26, 2025 3:51:42 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Christine Stockton
Pharmacist, San Diego native, Concerned citizen

Outlook

Lossan alternative alignments

From [redacted]
Date Fri 5/30/2025 8:53 PM
To LOSSAN Comments <lossancomments@sandag.org>

As a resident and homeowner in San Diego who uses the LOSSAN regularly under crest canyon alternative is by far the best option. While our neighbors in Del Mar will be slightly inconvenienced for a few years during construction making a permanent high speed option for getting to Los Angeles and Beyond is vital to San Diego city and County. I5 is nearing capacity and building an alternative along the bluffs just kicks the problem down the road and will end up costing more when the bluff corrosion forces us back to the same position. I believe the Under Crest Alternative is the only future proof option and we should move forward as soon as possible. Otherwise we are holding the county and city back from having a solid transportation plan for the near and long term

Sincerely
Sanjay Stone
Sent from my iPhone

Outlook

SDLRR Project NOP

From Lisa [redacted]
Date Fri 6/27/2025 8:25 PM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

Sincerely,
Lisa R. Stuck
City Of San Diego Resident and Homeowner

From: ELISABETH SULLIVAN [redacted]
Sent: Friday, June 27, 2025 7:37:45 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Elisabeth Sullivan

From: Larry & Pam Sward [redacted]
Sent: Wednesday, June 25, 2025 5:26:24 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because trenching and double-tracking

along the Del Mar bluffs would be considered “new development” under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

William Sward

From: Susie Talman [redacted]
Sent: Monday, June 30, 2025 3:50:47 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Public Comment Opposing Pink and Green Line Train Tunnel Alignments

Dear SANDAG Planning Team,

As a longtime San Diego resident and homeowner, I'm writing to express my strong opposition to the proposed Pink and Green Line train tunnel routes included in the LOSSAN realignment alternatives.

These routes—especially the plan for a tunnel portal at the base of Sea Point and Sea Village—pose serious and unacceptable risks to both the environment and the well-being of our community. Ten years of construction with 100,000 truckloads of excavation material routed through Carmel Valley Road would be profoundly disruptive. On top of that, the long-term operation of diesel exhaust fans near homes would create persistent noise and air quality issues.

This is not just a planning issue; it's a quality-of-life issue. The prospect of years of construction, environmental damage, and declining property values is deeply concerning. I urge you to prioritize less damaging and more community-supported alternatives.

The I-5 Knoll location offers a far more responsible solution. It avoids intrusion into the Los Peñasquitos Lagoon and aligns with the views of environmental groups and local residents. Continuing to analyze the Pink and Green Line alignments is a misuse of taxpayer resources and public trust.

Please remove the Pink and Green Line tunnel options from further consideration. San Diego deserves thoughtful, sustainable planning—this proposal is neither.

Sincerely,
Susan Talman
San Diego Resident and Homeowner

From: Stephanie Tarkington [redacted]
Sent: Saturday, June 14, 2025 4:26:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Re: Support of considering the Northern Yellow Line

Dear SANDAG representatives,

My residency on 11th St in Del Mar began in 1970. In 1978 my husband and I completed building our home at [redacted] 11th St on the bluff directly east of the railroad tracks. We loved all the trains, red cubusses especially. And, always enjoy train rides.

After reviewing all the alternate routes suggested for where the trains need to go as our sandstone bluffs continue to erode, it looks like the Northern Yellow Line will disrupt the least people, places and wildlife.

The negative horrific impact of portals anywhere near homes is probably my biggest concern for others. This Northern Yellow Line alternative should be deeply studied and assessed for helping all the entities: the Fairgrounds, Del Mar and Solana Beach residents and businesses, the lagoon environment and beyond.

Thank you for considering this perfect solution to so many of the issues you and your staff have been grappling with for several years.

Sincerely,
Stephanie Tarkington
[redacted] 11th St.
Del Mar, CA 92014

From: Tasha Taylor [redacted]
Sent: Wednesday, May 28, 2025 11:56:30 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Northern Yellow Line

My name is Tasha Taylor. I am a resident of Del Mar and I support the Northern Yellow Line for the rail reconstruction project.
Tasha

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Tasha K. Taylor, M.D.
Developmental-Behavioral Pediatrician
12625 High Bluff Drive, Suite 105
San Diego, CA 92130
(858) 465-0526 phone
(858) 434-2126 fax

From: Laura Tencer [redacted]
Sent: Monday, June 30, 2025 8:43:43 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Northern Yellow Line all the way!

Hello,

As a native San Diegan and a longtime resident of Del Mar, I strongly feel that the Northern Yellow Line is the only viable option. Del Mar is one of San Diego's gems and a tourist destination. Why would any sensible organization wish to destroy it when another option exists!

The Northern Yellow Line is the least impactful to Del Mar, its businesses, residents and the thousands of tourists that visit every year. It utilizes public property so no eminent domain would be required and downtown Del Mar could remain open to tourists during construction. The Fairgrounds still gets their event platform, and the residents of Del Mar would not have to worry about added noise, vibration, military trains traveling under their homes, and the added pollution or toxic chemicals.

Please do the right thing and consider the Northern Yellow Line as the only option.

Thank you!

Laura Tencer

From: Jen Terchek [redacted]
Sent: Friday, June 27, 2025 7:44:26 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Comment on the LOSSAN Rail Realignment

Jennifer Terchek
[redacted]
Del Mar, CA 92014

Date: June 27, 2025

To:
SANDAG Board of Directors
401 B Street, Suite 800
San Diego, CA 92101

Subject: Strong Opposition to Pink and Green Line Railroad Tunnel Routes

Dear SANDAG Board Members,

I am writing to express my strong and unequivocal opposition to the proposed Pink and Green Line routes under consideration for the new railroad tunnel. These routes pose serious threats to our neighborhood, coastal access, and the local environment, and they lack public support.

The Pink and Green Line routes would devastate cherished natural resources, including our coastal lagoon, public beaches, and mature trees that serve as vital habitats and buffers against climate change. These environmentally destructive options directly contradict the goals of sustainability and preservation that SANDAG claims to uphold.

Equally concerning is the irreparable harm this project would cause to our communities. These routes cut through established neighborhoods, displacing residents, disrupting local character, and forever altering the fabric of the area. There is overwhelming local opposition to these alignments. It is unacceptable to move forward with options so clearly unsupported by those most impacted.

In contrast, the I-5 Knoll location for the southern portal has garnered strong support from both the environmental community and local residents. It offers a far more responsible and community-aligned solution. Continuing to spend taxpayer dollars analyzing the Pink and Green routes is a clear misuse of public funds and undermines trust in the process.

I strongly urge SANDAG to immediately remove the Pink and Green Line routes from further consideration and to focus analysis on more viable, environmentally sound, and community-supported alternatives such as the I-5 Knoll location.

This project has the potential to do great good — or great harm. Please listen to the people you serve. Protect our neighborhoods, our natural resources, and our coastal legacy.

Sincerely,

Jennifer Terchek

From: Traci Tersigni [redacted]
Sent: Monday, June 30, 2025 3:35:00 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train Realignment

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, I strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

Traci Tersigni
SeaPoint owner and resident since 2002
[redacted]
Del Mar, CA 92014

From: David Trautman [redacted]
Sent: Thursday, June 26, 2025 11:23:44 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

David Trautman
Carlsbad, CA

From: Doug [redacted]
Sent: Sunday, June 1, 2025 6:35:29 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Rail realignment

Dear Sirs,

I wanted to express concern for the rail realignment plans. Relocating the tracts thru crest canyon would involve tunneling under people's property on the southside of Del Mar Heights road and then running thru Crest canyon on the other side of Del Mar Heights road. This would destroy a state park and the natural beauty of the area and displace the wildlife in the area and lead to loss of property values in the area likely totaling billions of dollars. It would also ruin the quality of life to this residential neighborhood. Running the railroad along I-5 would avoid all of these adverse impacts and seems to be the best all around choice.

Sincerely,

Douglas W Triffon

From: Roger Turpin [redacted]
Sent: Thursday, June 26, 2025 3:22:16 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Roger Turpin

From: Brandon Van Noord [redacted]
Sent: Wednesday, June 25, 2025 7:19:55 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

From: Brandon Van Noord [redacted]
Sent: Wednesday, June 25, 2025 7:20:08 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

From: Brandon Van Noord [redacted]
Sent: Wednesday, June 25, 2025 7:20:05 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

From: Joel Van Noord [redacted]
Sent: Wednesday, June 25, 2025 2:56 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: LOSSAN Rail Realignment

I strongly oppose keeping the train on the Del Mar bluff and feel it's best for the city and people of San Diego to relocate this train route away from the beach and bluff to one of the alternatives

Thank youj
Joel

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Sent from Gmail Mobile

From: Jeanna Vazquez [redacted]
Sent: Wednesday, June 25, 2025 7:22:53 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment. For the welfare of future generations, please discard the Double Track Reinforced option from study in this Draft EIR.

Thank you,
Jeanna

From: Frank Vining [redacted]
Sent: Wednesday, June 25, 2025 9:12:34 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

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Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

From: Christian Voigtlander [redacted]
Sent: Saturday, June 21, 2025 5:38:59 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Rosee V <rosee_bv@hotmail.com>
Subject: Study the Northern Yellow Line

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment remains in consideration.

Rosee and Christian Voigtlander
[redacted] Del Mar, CA 92014

From: Lawrence Vulis [redacted]
Sent: Monday, June 30, 2025 8:11:43 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: LOSSAN re-alignment comments

I am a resident of the City of San Diego and concerned about getting the LOSSAN corridor improved in a timely manner.

I myself use the Amtrak and Coaster regularly, going up to LA and Orange County for work and personal trips. I skip the 5 and take it easy on the train with millions of other travelers per year. Our trips cut VMTs and save on emitting carbon and combustion byproducts, as well particulate matter from tires that runs off into our beautiful beaches.

The LOSSAN corridor doesn't just move people, it also moves goods and materiel for the public. It helps prevent pollution and keeps roadways free of traffic.

The LOSSAN corridor improvements need to be done in a rapid way that (1) minimize impact to the surrounding environment during construction while (2) improving the long term viability and resilience of the train corridor and (3) future-proofing for future tehcnology upgrades like catenary rail.

Short-term disruption to the environment will be necessary for the long-term savings in pollution that this corridor re-alignment will allow for.

I highly encourage the city to go with the Camino Del Mar route with sufficient leeway for electrification of the future amtrak and other lines running on the LOSSAN. A recent KPBS report highlighted catenary, but any other technology that can allow electrification without onboard batteries should be considered. Whatever the tech in mind, the LOSSAN upgrade should be done with electrification in mind. I understand that Phil Birkhain from SD350 has been discussing having overheard direct rails, and if this can be considered, that is a viable option. Once digging commences it will be difficult to go back.

The recent electrification of CalTrain benefitted from such upgrades, with double digit increases in ridership and trip times significantly saved.

Thank you for your attention and I hope SANDAG can help one of the densest regions in the country build out its rail system.

Respectfully,
Lawrence Vulis

From: Ellen Wade [redacted]
Sent: Thursday, June 26, 2025 5:54:27 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require

“construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

From: Ellen Wade [redacted]
Sent: Thursday, June 26, 2025 5:54:39 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

From: Ellen Wade [redacted]
Sent: Thursday, June 26, 2025 5:54:43 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG, This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see. Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs. If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time. Thank you.

From: Nehal Wadhwa [redacted]
Sent: Monday, June 30, 2025 9:42:09 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Pink and Green Line routes

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.

From: Ann Wagenhals [redacted]
Sent: Monday, June 30, 2025 5:15:03 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Resident comment--High-speed train project

Dear SANDAG,

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support.

Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. I strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you.

Ann Wagenhals
[redacted] Del Mar

Outlook

SDLRR Project NOP

From Rose [redacted]
Date Wed 6/25/2025 9:47 AM
To LOSSAN Comments <lossancomments@sandag.org>

Dear SANDAG LOSSAN Team, Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach. The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal. Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar." Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others. Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs

Double Track would require “construction of bluff stabilization elements, including new and expanded seawalls,” therefore cannot be lawful according to Section 30353(b) of the Coastal Act. Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise. In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches. Thank you for the opportunity to comment.

Thanks,
Rose Wagner
[redacted]

Attachments: Letter to SANDAG re LOSSAN NOP 2-26-25.pdf

From: Udo Wahn [redacted]
Sent: Monday, May 26, 2025 4:46:30 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: LOSSAN NOP comments

Please see attached PDF with my comments

Udo Wahn, M.D.

May 26, 2025

Letter to SANDAG re: NOP

To: SANDAG Re- LOSSAN realignment NOP

My name is Dr. Udo Wahn. I have been a Del Mar resident for 42 years and frequent the beach and bluffs almost daily.
The bluff erosion and sea level rise pose an alarming threat to the safety of the public and trains on the bluffs.

The newly stated goal of this NOP does not include “...relocating the existing railroad tracks…” as was the goal in the first version of the NOP!

The CA Coastal Commission(CCC) requires that the tracks be relocated off the bluffs. It is NOT acceptable to consider double tracking as that would require massive additional bluff stabilization with more sea walls.
At a CA Coastal Commission hearing June 8, 2022 SANDAG promised to relocate the existing railroad tracks.
In fact, the CCC required that the seawalls be removed after relocation as well. There is no permission to do further stabilization and to allow for more seawalls ,which would be needed to double track on the bluffs. As we know seawalls will result in loss of the beach. The beach belongs to the public and it must be protected and allowed to be accessed by the public.

I also feel strongly that another alignment should be considered, that would be one that would go from the San Dieguito bridge, heading north and along the northern boundary of the San Dieguito lagoon and not interfering with the DM Fairgrounds.

Thank you,

Udo Wahn, M.D.
[redacted]
Del Mar, CA 92014

From: Chris Wakeham [redacted]
Sent: Thursday, June 26, 2025 6:00:49 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Under Camino Del Mar Alternative Alignment

Hello,

I would like to voice my support for the San Diego LOSSAN Rail Realignment Option: Under Camino Del Mar Alternative Alignment

None of the other options make any sense.

Chris Wakeham

From: Sunday Wakeham [redacted]
Sent: Thursday, June 26, 2025 6:02:52 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Re: Under Camino Del Mar Alternative Alignment

Hello,

I would like to voice my support for the San Diego LOSSAN Rail Realignment Option:
Under Camino Del Mar Alternative Alignment
It is the ONLY OPTION that makes any sense and I fully support this option.

Sunday Wakeham

From: Waldo [redacted]
Sent: Friday, June 27, 2025 7:35:54 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Saludos SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Gracias for considering my comment.

~Waldo

From: [redacted]
Sent: Thursday, May 29, 2025 2:24:43 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Railway Realignment in Del Mar

We want to voice our support for the study of the **Northern Yellow Line** option that runs **North of the San Dieguito Lagoon**., Option 5.

1. This option will not have a negative impact on ANY homes or businesses In Del Mar.
2. It has no negative impact on Solana Beach.
3. It preserves the San Dieguito Lagoon.
4. There would be no tunnels under homes or placement of portals near homes.
5. It does not displace families or require the use of Eminent Domain to force people out of their homes.
6. It allows the Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the Lagoon.
7. It assumes that the Fairgrounds will have their Special Events Platform as planned.
8. It runs entirely along state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.

Considering the necessity of moving the train tracks off of the cliffs in Del Mar, this 5th option (Northern Yellow Line) makes it possible to protect people, homes, and businesses and help to preserve our unique, rare and beautiful coastal environment. We strongly encourage SANDAG to seriously study this fifth option called Northern Yellow Line option by the residents and businesses of Del Mar.

Thank you for your consideration,

Wade and Rebecca Walker
[redacted]
Del Mar, CA 92014

[redacted]

Outlook

Train Realignment

From Keith Wang [redacted]
Date Mon 6/30/2025 10:59 AM
To LOSSAN Comments <lossancomments@sandag.org>

There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration.

Thank you
Keith Wang

Keith Wang
[redacted]

From: Stephanie Warner [redacted]
Sent: Friday, June 27, 2025 7:08:04 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Stephanie Warner

From: Bruce Watson [redacted]
Sent: Saturday, June 21, 2025 10:32:23 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Lossan train route or wreck ??

As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives.

The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment remains in consideration.

Bruce and Sandy Watson
[redacted]

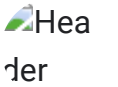
Outlook

Community Letter to SANDAG.docx

From Bruce Watson (via Google Docs) [redacted]
Date Thu 5/29/2025 5:23 PM
To LOSSAN Comments <lossancomments@sandag.org>

1 attachment (8 MB)
Community Letter to SANDAG.docx.pdf;

Bruce Watson attached a document



Bruce Watson ([redacted]) has attached the following document:

Please accept my signed letter attached requesting Sandag to include the Northern Yellow Line as the best train alignment.

Community Letter to SANDAG.docx

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
You have received this email because bdubswims@gmail.com shared a document with you from Google Docs.

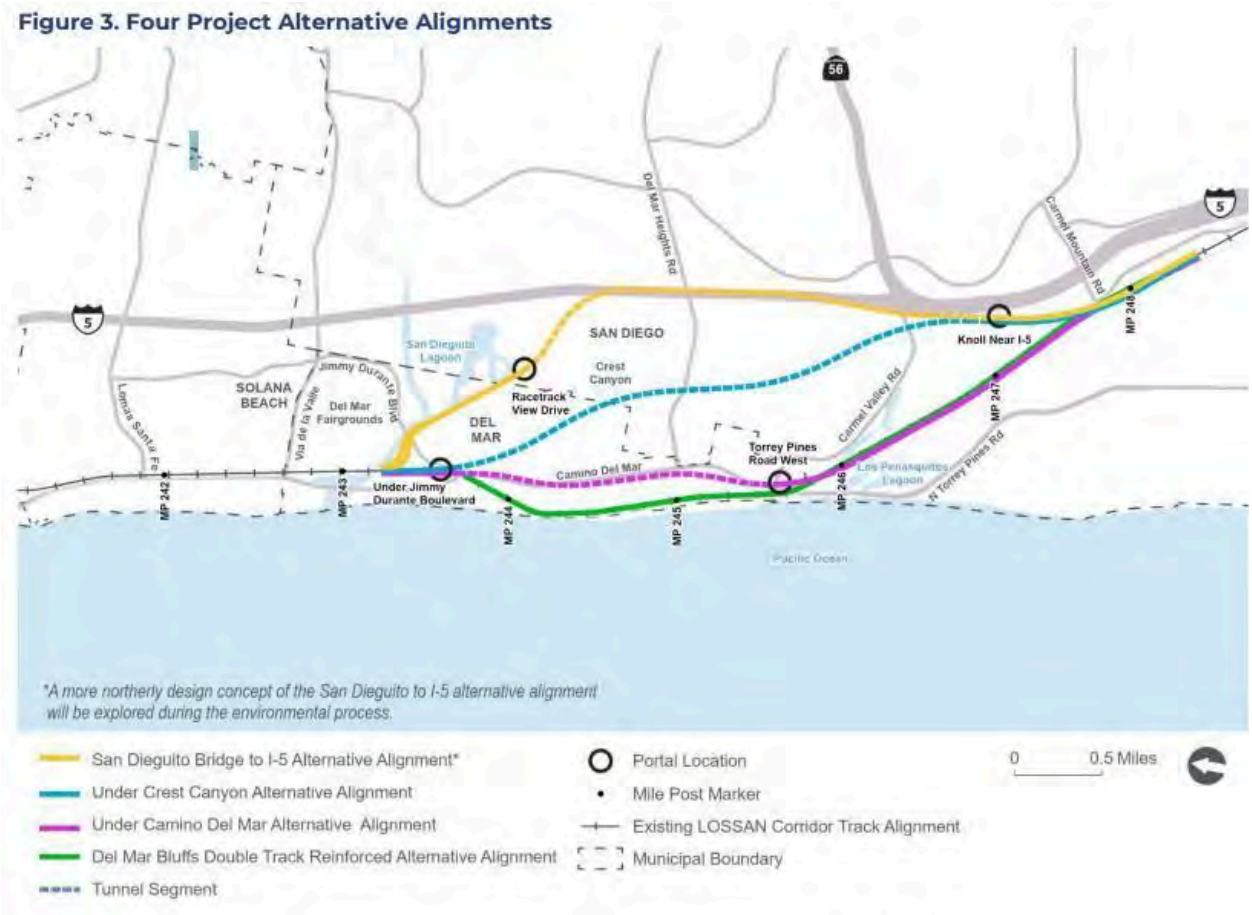
May 28, 2025

Dear Friends and Neighbors:

On May 15, SANDAG released their Notice of Preparation (“NOP”) for the Environmental Impact Report (“EIR”) showing four alternative rail alignments. The purpose of this letter is to ask for your support for a specific fifth realignment route to be studied in the EIR. This fifth alignment is referenced but not outlined in the NOP.

The SANDAG NOP can be found at the following link and contains the Figure 3 map below:

https://www.sandag.org/projects-and-programs/featured-projects/lossan-corridor-improvements/-/media/1F260CF9385B4A1482685161BA7BB20A.ashx



These four proposed rail alignments are all extremely unsatisfactory for a number of reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. Two of the realignments place huge, air-polluting portals near the coast, homes and the Fairgrounds. The green route that proposes double tracking on the bluffs would destroy Del Mar’s coastal bluffs and beaches and contravenes an agreement with the Coastal Commission. All non-bluff routes and the bluff-top double-tracking route will require either direct eminent domain taking of homes and businesses or impose diminution of value and adverse impact on quality of life.

However, SANDAG has added one possible alternative (with an asterisk) on their drawing, noting that – “A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process.” Indeed, SANDAG staff committed to developing this route to the same level as their other proposed routes.

This “northerly design concept” is called the “Northern Yellow Line” (NYL) here and was conceived by residents and businesses, who are working together to find an alternative rail route that eliminates or greatly reduces the adverse impacts of realignment on neighborhoods and businesses, while still meeting the needs of passengers and rail stakeholders. The NYL route was first presented to SANDAG engineers and management on February 18th at a Del Mar City Council meeting and communicated to SANDAG staff by email. The route has also been presented at SANDAG board meetings and will be formally submitted in response to the May 2025 NOP. The NYL route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

Your Support for the “Northern Yellow Line” Is Needed

In response to questions from the Board and the public, at the February 28, 2025 SANDAG Board meeting, SANDAG’s CEO committed to study this route as part of the EIR, but residents and businesses need to show their support for the study of the Northern Yellow Line in writing and in person before our window of opportunity to comment on the May 2025 NOP closes on June 30, 2025.

SANDAG is seeking input on the Draft EIR scope, including the alternative alignments that will be under consideration and potential environmental impacts. A public scoping meeting is scheduled on May 29, 2025, from 6:00 to 7:30 pm at the Sound at the Del Mar Fairgrounds. Written comments should be addressed to SANDAG, 1011 Union Street, Suite 400, San Diego, CA 92101, ATTN: LOSSAN Comments and sent via email with subject line “SDLRR Project NOP” to: LOSSANcomments@sandag.org; Also, see this webpage for additional details: https://www.sandag.org/railrealignment

Comments may also be provided orally (and then transcribed) or in writing at the public scoping meeting. In addition, comments can be submitted online here: https://engage.sandag.org/lossan-rail-realignment

We seek your support for objective study of the Northern Yellow Line. A strong, unified response to the NOP during the comment period is the most important action that Del Mar residents, apartment owners and businesses can take at this time. **We’re offering an email template below that anyone can adapt and personalize and submit to SANDAG before June 30th.**

Thank you for taking action!

Coalition for Safer Trains

To SANDAG:

My name is _Bruce and Sandy Watsonand I live on [redacted], Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3) Has no negative impact on the City of Solana Beach
4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6) Eliminates expensive tunnels under private property and below sea level
7) Assumes the Fairgrounds will have their special events platform as planned
8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

From: Bruce Watson [redacted]
Sent: Saturday, June 21, 2025 10:28:38 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Del Mar tunnels

I rode Amtrak last Sunday from LA to Solana beach. I'm convinced and adamant that the(is the only solution to rerouting these tracks in Del Mar is using the NYL Northern Yellow Line.

I took Amtrak for LA down to Solana Beach last Sunday. It's plain to see - that moving the tracks off the coast is the solution best suited for California.

In fact, I'm of the opinion that all and any coastal train tracks and/or routes should be relocated off the beautiful California coast to an inland location like freeway 5 or Interstate 15.

Thanks

Outlook

LOSSAN Rail Realignment Comments

From Connor Webb [redacted]
Date Mon 6/30/2025 1:27 PM
To LOSSAN Comments <LOSSANcomments@sandag.org>

Dear SANDAG Board Members,

I am highly supportive of the LOSSAN Rail Realignment Project, and I **SUPPORT the Under Crest Canyon alignment**, with Under Camino Del Mar as a close second. Additionally, I **OPPOSE the San Dieguito Bridge to I-5 Alternative Alignment, Del Mar Bluffs Double Track Reinforced Alternative, and No Build Alternative**. After reviewing the Value Analysis Study, this alignment is the most rational path forward for our needs and offers the lowest risk. Crest Canyon stands out for a few reasons:

> **Maximum long-term Reliability**: Reliability is essential for any transit system, and risks of closures to an alignment along the bluffs is untenable. By moving trains away from the unstable bluffs, a tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this section and limited the usefulness and ridership of LOSSAN.
>
> **Best Travel Time and Speed:** The 110 mph capability of the Under Crest Canyon alternative keeps rail competitive with driving between San Diego and LA, a crucial benchmark to promote mode shift and reduce highway congestion. It is in line with long-term goals of raising the LOSSAN corridor to 110 mph and with long-term projects currently being planned, such as Carlsbad Village Trench, Miramar Realignment, and various curve straightening, nearly all of the track north of SR-52 within San Diego county would be 110 mph. On the other hand, low speed curves on the I-5 Alternative Alignment and Reinforced ROW Alternative both severely limit speeds, and the 90 mph limit of "Under Camino Del Mar" is below the target for the corridor. Even worse, as these curves are not adjacent to a station, they will impact all local and express trains travel times.
>
> **Lower Risk, Reduced Impacts to Sensitive Habitats, and Environment Stewardship:** Compared to Crest Canyon, Camino Del Mar tunnels under more homes and continues to have rail service in Los Pensaquitos Lagoon, resulting in higher lawsuit potential and vulnerability to CEQA challenges. This could result in delays, cost escalations, or force an alignment change to speeds even lower than the already suboptimal 90 mph.

However, **it is absolutely essential that all alternatives include a tunnel diameter that permits electrification via overhead contact system (OCS)**. OCS is the most efficient, reliable, and sustainable way to power rail services and any infrastructure projects on LOSSAN should ensure compatibility. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. In addition to overhead wires, OCS via conductor rail (also called rigid overhead contact system, overhead contact rail, overhead rigid rail, overhead contact bar) can reduce clearance requirements while still being capable of speeds well beyond 110mph (as seen in Austria's Sittenberg Tunnel and Switzerland's Ceneri Base Tunnel at 155 mph). Options even exist for retractable overhead conductor rail if it is expected that extraordinary clearances will occasionally be needed— such as for moving rare oversized military equipment. It is crucial that the DEIR scope include the requirement that **all designs studied in the DEIR should be able to accommodate some sort of OCS, whether wire or rigid conductor, with clearances for both freight and passenger rail traffic.**

I am excited to see this project move forward, and I hope you will clarify that appropriate clearances for electrification will be included in the project requirements. This project represents an investment that will impact generations to come, and an (electrified) **Under Crest Canyon** alignment offers the best value for taxpayers and positions San Diego County for sustainable growth and abundant mobility.

Sincerely,
Connor Webb

From: Matt Weiss [redacted]
Sent: Monday, June 30, 2025 6:37:51 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: Yellow line

The yellow line is the only and most sensical option for the LOSSAN route through Del Mar!

Matt Weiss
[redacted]

From: Dixie Welsh [redacted]
Sent: Monday, June 30, 2025 7:27:10 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Northern Yellow Rail Line

Dear SANDAG,

The only reasonable way is the Northern Yellow Line. It does not require the destruction of homes & peace in Del Mar.
It aligns the train to I-5 Transportation Corridor.
It. gives the Fairgrounds their platform.

Thank you for your attention,
Mary D. Welsh
[redacted]
Del Mar, CA92014

From: Beth Westburg [redacted]
Sent: Monday, June 30, 2025 1:16:20 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Lossan Draft EIR comment

Sandag:

I am disappointed that you are not putting communities first in your Rail Realignment Projective Objective. The Rail Realignment Projective Objective is fatally flawed in the NOP. It should be to avoid adverse effects to the community while enhancing rail service. SANDAG's selection of study routes demonstrates a clear favoritism of rail stakeholder interests to the exclusion of the interests of the hosting community.

The Project Objective is fatally flawed because it prioritizes speed and operations of the rail stakeholders over avoiding adverse impacts to the Community. The appropriate project objective should be to avoid adverse impacts to the hosting community while enhancing rail transportation. In general, the three non-bluff proposed routes that SANDAG approved for study at its meeting of the Board on February 28, 2025 would force government take-over of homes by eminent domain or bore a double-track tunnel directly under our homes or run the trains so close to homes so as to destroy the quality of living for the residents and greatly devalue their homes. These routes would also place air-polluting portals proximal to homes, businesses and the coast. The double-track the Bluffs option as well as the no-build option would destroy the Del Mar Bluffs and its beaches.

The City of Del Mar is the stakeholder most profoundly affected by the realignment, both with respect to the enormous disruption that will be caused by years-long construction and by the drastic consequences of the realignment. The burdens that accompany the benefits from realignment should be shared by stakeholders who are receiving the benefits. The need for realignment has been caused by natural forces, not any action of Del Mar. Because the realignment is designed to benefit several stakeholders - the Fairgrounds (free event platform), Solana Beach (retains its station), NCTD, BNSF, AMTRAK, COASTER, SPRINTER and all of San Diego - its adverse consequences must not fall solely or disproportionately on Del Mar and the selection of a route that minimizes community and environmental impacts must be chosen over high speed in a densely populated community.

As SANDAG moves forward with the LOSSAN Rail Realignment Project, please include the Northern Yellow Line alignment. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment is in consideration.

If the Northern Yellow Line is not realistic, Sandag needs to create a route that:

1. **No negative impact on ANY homes or businesses.**

2. **Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon.**

3. **No negative impact on the City of Solana Beach.**

4. **Places no air-polluting Portals near homes, near the coast or near the Fairgrounds.**

5. **Bores no tunnels under or near homes.**

6. **Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of the 370-acre Fairgrounds by running along the outer edge. and if needed, obtaining an easement from the Fairgrounds for which compensation can be paid without displacing families.**

7. **Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise.**

8. **Assumes the Fairgrounds will have their special events platform as planned.**

9. **Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon.**

10. **Is expected to cost considerably less than other routes that require tunneling and eminent domain of homes and businesses.**

11. **Has the greatest likelihood of avoiding litigation and delays of construction which would greatly increase the route costs.**

Lastly, in the route cost tabulation, please include both future AND present dollar estimates. In addition, give an estimate of price per foot (or mile) so alternatives can be compared. It is impossible to compare cost estimates over different time periods and different lengths.

Put people first,

Beth Westburg

[redacted]

Del Mar, CA 92014

From: Reid Westburg [redacted]
Sent: Sunday, June 29, 2025 2:30 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Cc: Angelina Neglia [redacted]; hershellprice@knowledgeforthevote.org; Beth Westburg [redacted]
Subject: Include Northern Yellow Line in Study

To SANDAG,

As SANDAG moves forward with the LOSSAN Rail Realignment Project, please include the Northern Yellow Line alignment. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment is in consideration.

Also, in the route cost tabulation, please include both future and present dollar estimates.

Sincerely,

Reid Westburg
[redacted]
Del Mar, CA 92014
[redacted]

Attachments: image001.png

From: Kevin Whaley [redacted]
Sent: Wednesday, May 28, 2025 11:53:57 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>; Kevin Whaley [redacted]
Subject: NYL concept, Del Mar

To SANDAG:

My name is Kevin J Whaley and I live in Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1. Has no negative impact on ANY homes or businesses in Del Mar
2. Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3. Has no negative impact on the City of Solana Beach
4. Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5. Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6. Eliminates expensive tunnels under private property and below sea level
7. Assumes the Fairgrounds will have their special events platform as planned
8. Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.

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From: arnold wiesel [redacted]
Sent: Monday, June 30, 2025 7:59:29 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: NORTHERN Yellow line is the BEST OPTION.....

The **Northern Yellow Line** by far is the most unintrusive route, creating the least amount of harmful negative impacts for existing residential neighborhoods, residents and all people including elderly, children, guests, tourists, future generations, etc...

It should be of paramount importance for our government to **object to such massive negative impacts which would be created if the trains/tracks were to be built on the south side of the lagoon!**

Extreme changes/increases of sound/noise to this environment and change to it's undisturbed beauty would have harmful negative impacts impacting the environmental views and stressing human sensitivities which are but only a few of the most obvious horrors that would be felt by the people, if the train tracks were built on the south side of the Lagoon.

Humans (elderly and children) will stress and be harmed from the noise and closest proximity of trains, etc. These agitations and aggravations would be caused and created by having the tracks/trains located on the south side of the lagoon. An extremely hazardous and dangerous situation to all present and future

generations who could be otherwise safer from personal harm. In fact, they would be enriched, prospering from the more preferred undisturbed natural environment design location which would be and is the **Northern Yellow Line location.**

It is imperative for the interests of all persons, all San Diegans, that the Northern Yellow Line Alignment not only be included equally for study with any/all other alternatives but ultimately be the single best choice.

The Northern Yellow Line is The Best Option

The SANDAG alignment shown in the NOP that is labelled “San Dieguito Bridge to I-5 Alternative Alignment” as well as the other three SANDAG alignments **do not satisfy key project objectives** to “Avoid and/or minimize negative effects …(on)… publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges….” and to “Minimize impacts in the surrounding communities to existing homes (and) businesses…”

SANDAG’s “yellow line” would have adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive and damage the San Dieguito Lagoon. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, destroy the livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds. The Bluffs Double Track would destroy Del Mar beaches by adding to the armoring of the bluffs.

However, SANDAG Staff’s recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of a less expensive and less destructive northern route. The Northern Yellow Line has many advantages that the SANDAG “yellow line” and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon
3) Has no negative impact on the City of Solana Beach
4) Places no portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families.
6) Eliminates expensive tunnels under private property and below sea level
7) Includes the Fairgrounds special events platform as planned
8) Allows Riverpath Del Mar to be completed as planned, which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and

safe trail along the edge of the lagoon

Respectfully,
Arnold Wiesel
President of Del Mar Hillside Community Association
[redacted]
Del Mar, Ca 92014

From: patricia wilmot [redacted]
Sent: Monday, June 30, 2025 11:01:00 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

I am retired and live in the Del Mar Woods condominiums, which is part of a quiet Del Mar neighborhood. One of the proposed route, the Del Mar Bluffs Double Track Reinforced Alternative Alignment, would go under our home. This would have negative effects such as noise, vibration, air pollution, and pose a danger from hazardous waste spills. I highly recommend that this route be taken off the table. The most logical route that would have the least disruption to Del Mar neighborhoods would be the San Diego Bridge to 1-5 Alternative Alignment, or a route alongside 1-5 or under 1-5.

Thank you for your consideration,

Patricia Wilmot
[redacted]
Del Mar, CA

From: Janet Wilson [redacted]
Sent: Monday, June 30, 2025 5:18:02 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Cc: Janet Wilson [redacted]
Subject: Northern Yellow Line - A Logical Option

To Whom it May Concern - SANDAG,

The **Northern Yellow Line** is the most acceptable route for the double-track high-speed commuter and freight rail line and should be **seriously considered.**

I have lived in Del Mar since 1999 and deeply appreciate the village's suburban character. Its shops, restaurants, and parks are all within walking distance of my home. There is nothing industrial about Del Mar except the train tracks that run along the bluffs. While trains are a crucial part of California's infrastructure, the current route along the Del Mar bluffs is a serious concern. Constant erosion and increasingly frequent collapses are not just inconveniences—they put safety and well-being at risk.

Ironically, the train tracks once followed a safer inland route above Del Mar's streets before being moved to their current, more precarious position along the bluffs in the early 1900s. While there may have been reasons for that decision at the time, it is clear **in hindsight that a more inland alignment would have been far less damaging to our fragile coastline**. You now have the opportunity to avoid repeating this mistake by considering how Del Mar and the surrounding environment should look in 100 or even 200 years.

Janet Wilson
[redacted]
Del Mar, CA 92014
[redacted]

-

From: D. Wohlford [redacted]
Sent: Monday, May 19, 2025 8:43:52 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Del Mar railroad track relocation options

To Whom It May Concern:

I am a Del Mar resident. I have closely followed SANDAG's machinations with relocating the train tracks through Del Mar.

Some thoughts:

The train tracks are a regional issue. San Clemente suffers from the same issues. It is unfair to burden Del Mar residents and San Diego County taxpayers with the outrageous costs to move the tracks when there needs to be a regional solution that solves issues with the train tracks in Orange and San Diego counties.

The most palatable option being put forth is the Yellow option, which travels along San Dieguito Road to I-5. The other options will destroy the city of Del Mar.

Why not explore running the tracks along I-5, similar to the 105 in LA County, or the LA Metro that runs along I-10 through Pasadena and points east? It can be done!

Dana Wohlford
[redacted]
Del Mar, CA

From: Dana Wohlford [redacted]
Sent: Thursday, May 29, 2025 2:34:53 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Del Mar Train Realignment

SANDAG Members:

My name is Dana Wohlford and I live in Del Mar. I respectfully encourage SANDAG to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause additional damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows:

From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at

the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labeled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses..." SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds.

However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed Northern Yellow Line route offers the following advantages. It:

1) Has no negative impact on ANY homes or businesses in Del Mar;
2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon;
3) Has no negative impact on the City of Solana Beach;
4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes;
5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families;
6) Eliminates expensive tunnels under private property and below sea level;
7) Assumes the Fairgrounds will have their special events platform as planned;
8) Allows River Path Del Mar to be completed as planned

which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon.

I hope that SANDAG will fulfill their commitment to study the NYL. It is cleared possible to choose a route for the realignment that protects people, homes, and businesses AND our unique, rare and beautiful coastal environment.

Thank you for your consideration.

Dana Wohlford

From: Dana Wohlford [redacted]
Sent: Saturday, June 14, 2025 8:08:03 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <LOSSANcomments@sandag.org>
Subject: Support for Del Mar Yellow Line

Dear SANDAG Members;

As SANDAG is moving forward with the LOSSAN Rail Realignment Project, we are now at a critical junction in this process. The main concern is that the Camino Del Mar and Crest Canyon High Speed alignments route the train, carrying hazardous materials, into and through residential neighborhoods. If SANDAG is truly representing the people in their communities, they will select the SAFEST ROUTE for the freight train to travel through our region.

Moving the tracks to a tunnel under homes only trades one dangerous train track for another. If this tunnel is built, BNSF Railroad will be carrying hazardous materials and toxic chemicals directly under Del Mar and San Diego residential neighborhoods, including homes, businesses, infrastructure and public recreational spaces. There is a safer alternative.

The Northern Yellow Linet to the I-5 is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, we are requesting that the portals are located away from homes and that the tracks are routed via the Northern Yellow Line east to the I-5.

I strongly encourage your support of the proposed yellow line. Thank you for your consideration.

Dana Wohlford
Del Mar resident

From: Maidy Morhous [redacted]
Sent: Saturday, June 21, 2025 8:40:45 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Amtrak rail alignment

Attn: Clerk of the Board
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

June 9, 2025

Dear Honorable Members of the Board of SANDAG,
I appreciate the time and effort the Board has invested in safeguarding the future of this rail corridor. Having reviewed the revised SANDAG report and recommendations, and having commented on the previous (and essentially identical) version of options, I would like to take this time to comment on the ones currently under consideration. **The best option is San Dieguito Bridge to I-5 Alternative Alignment.** Let me explain why.
First, imagine no rail line existed and SANDAG were charged with finding a route from Sorrento Valley to Solana Beach. It is almost impossible to imagine that a crossing of Los Penasquitos lagoon and Torrey Pines State Reserve would be considered. This highly sensitive and treasured habitat serves enormous environmental benefits, not least as a bastion of a rare and vanishing ecosystem, but also as a natural buffer against sea level rise. There is one option that offers the opportunity to undo the terrible wrong that was done in the original laying of these tracks, the I-5 Alternative Alignment. Removing the existing railroad berm and bridge is worth billions in environmental benefits.
Second, all three western routes will worsen the situation in the lagoon by destroying additional habitat for construction of new portals and additional berm and bridge.
Third, assuming the new rail line should last at least 100 years, the easternmost route offers the best protection against the sea level rise and the expected more frequent, severe storms, as well as the risk of tsunamis over that time.
Fourth, the I-5 Alternative Alignment will reduce the costs of taking valuable property from private landowners. The worst option (the alternate along Camino Del Mar) is likely to require hundreds of millions of dollars of remediation to homes and businesses along the route, to compensate for takings and damages. That degree of disruption would represent a huge and possibly fatal blow to the business district and neighborhoods of Del Mar.
The Board faces a choice among options, none of which is ideal. However, it is clear that one option is substantially better than the others: **the San Dieguito Bridge to I-5 Alternative Alignment.**
I strongly encourage the Board to choose this best option and get started on securing the future of the LOSSAN corridor for commuters, freight haulers, our national security and the benefit of San Diego County, the state of California, and the United States.
Thank you for your consideration.
Sincerely,

Margaret Wolf & Terry Morhous

[redacted]
Del Mar, CA 92014

Maidy Morhous Sculptor
www.maidymorhous.com
[redacted]

From: Maidy Morhous [redacted]
Sent: Tuesday, July 1, 2025 11:21:43 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject:

> **There are major problems with the Pink Line and Green Line routes. They are environmentally damaging and have no community support. On the other hand, the I-5 Knoll location for the southern portal has strong support from the environmental community and local residents. To continue analysis of the Pink Line or Green Line routes is an obvious waste of taxpayer dollars. Therefore, we strongly encourage you to remove the Pink Line and Green Line routes from further consideration.**

Margaret R Wolf
[redacted], Del Mar, CA 92014

From: Andres Wong [redacted]
Sent: Sunday, May 18, 2025 8:32:56 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: CV Live Data Robert Johnson <Chulavistalivedata@gmail.com>; Shandel Menezes (NBCUniversal) <Shandel.Menezes@nbcuni.com>; NBC Jeanette Quezada <jeanette.quezada@nbcuni.com>; "KGTV 10 Olivia GonzalesBritt <olivia.gonzalezbritt@10news.com>; NBC 7 San Diego <limsandiegonewstips@nbcuni.com>; CBS News 8 San Diego <yourstories@kfmb.com>; KPBS San Diego <news@kpbs.org>; KUSI ch 9 San Diego <NEWS@kusi.com>; ABC 10 San Diego <team10@kgtv.com>; KOGO Carl DeMaio (Reform California KOGO DeMaio Report) <carl@reformcalifornia.org>; sdnews.com <reporter@sdnews.com>; La Prensa San Diego <news@laprensasd.com>; San Diego UT Senior Editor <lora.cicalo@sduniontribune.com>; San Diego UT Community Op Ed <tania.navarro@sduniontribune.com>; Times of San Diego <news@timesofsandiego.com>; Voice of San Diego <tips@voiceofsandiego.org>; Chula Vista Star News <info@thestarnews.com>; News Chula Vista Today <news@chulavistatoday.com>; Editor-The Alpine Sun <albert@integritynews.us>; East County Californian (based in El Cajon <carlos@integritynews.us>; East County Magazine <editor@eastcountymagazine.org>; Borrego Springs Sun <editorialsun@gmail.com>; Coronado Times <manager@coronadotimes.com>; News Coronado Eagle Journal <editor.eaglenews@gmail.com>; La Jolla Light Editor <robert.vardon@lajollalight.com>; Editor, del mar times <editor@delmartimes.net>; News Encinitas Advocate <editor@encinitasadvocate.com>; Rancho Santa Fe Review <editor@rsfreview.com>; Carlsbad Coast News (also San Marcos Vista & Oceanside <editor@coastnewsgroup.com>; The Paper Weekly San Marcos <thepaper@cox.net>; The Vista Press <thevistapress@gmail.com>; Escondido Times-Advocate <News@times-advocate.com>; Village News <frontdesk@reedermedia.com>; J Paul Henkin [redacted]
Subject: SDLRR Project NOP

To All Concerned Parties,

Per https://lajolla.com/news/del-mar-train-tracks-bluff-collapse/, the erosion rate of the Del Mar Bluffs over which the current LOSSAN tracks are found, is 6 inches per year. This would mean that after this 10-year SANDAG plan, the bluffs would be eroded to about 5 feet, moving it inland by greater than the standard width of rail tracks! What then? Another plan to move the rails inland again?

And digging tunnels for the LOSSAN tracks to go underneath the bluffs would require extensive and costly reinforcements against the train vibrations to prevent the Del Mar homes and business offices from collapsing with the bluffs into the sea.

I therefore recommend developing a 100-year plan involving redirecting the LOSSAN rails on the surface starting from Oceanside to go eastward parallel to SR 78 and then southward parallel to I-15.

For your consideration.

Respectfully,

Andres Wong

Chula Vista

On Sat, May 17, 2025 at 4:41 PM [redacted] wrote:

KSWB-TV San Diego

Community feedback needed on LOSSAN rail realignment plans

Story by Anna Ashcraft [5/16/2025]

ARTICLE and what I sent.

SAN DIEGO (FOX 5/KUSI) — SANDAG has proposed four alternatives for relocating train tracks from the eroding cliffs of Del Mar, and public feedback will be open for nearly two months.

The cliffs of Del Mar are eroding at an average rate of six inches per year, posing a risk to the train tracks currently situated on the edge. SANDAG's proposed solutions for relocating the San Diego Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail in that area includes three tunnel options under Del Mar and one option to reinforce and double-track the current cliffside location.

The Mayor and city council of Del Mar have expressed opposition to the current options and have suggested a different location not included in SANDAG's proposals.

The Pink, Blue, and Yellow Line options involve constructing tunnels at various locations under Del Mar, aiming to move the tracks away from the unstable cliffs. These options are part of SANDAG's efforts to address the erosion issue. The Green Line option proposes reinforcing the existing tracks on the cliffs by double tracking them, despite the ongoing erosion.

SANDAG has also included a "no build" option, which would leave the tracks in their current location without any modifications.

[Even though it was told to move the tracks off the bluffs.]

On Feb. 28, 2025, the SANDAG moved forward with proposed project goals, objectives, and alternative alignments, including a no build alternative, into environmental document process. An updated NOP of a Draft Environmental Impact Report was released in May, starting a 45-day scoping period to collect feedback.

As SANDAG continues to plan for the preparation of a Draft Environmental Impact Report for the San Diego LOSSAN Rail Realignment project, they are asking the community to read the notice and share your comments by June 30, 2025.

A public scoping meeting will be held at The Sound at the Del Mar Fairgrounds on May 29 from 6 to 7:30 p.m. for project updates and to allow the public to provide comments on the scope and content of the Draft Environmental Impact Report.

[Hem Hem - 1 ½ hours is not enough, but it's an opportunity to meet & greet (maybe free gelato?)]

Public input will be taken at the meeting and can be provided in person, or in writing via letter, email, or online. Written comments on the scope of the EIR should be sent:

- Via mail to SANDAG, 1011 Union Street, Suite 400, San Diego, CA 92101, ATTN: LOSSAN Comments
- Via email to lossancomments@sandag.org with subject line "SDLRR Project NOP"
- Online at SANDAG.org/railrealignment

Due to the time limits mandated by state law, responses must be sent at the earliest possible date, but no later than June 30, 2025.

Public feedback is open for 45 days so residents and stakeholders can voice their opinions on the proposed alternatives.

For more information on this project, the scoping period, or the environmental process, visit SANDAG.org/railrealignment.

For the latest news, weather, sports, and streaming video, head to FOX 5 San Diego & KUSI News.

WHAT I sent (feel free to use extracts or just copy the whole thing):

So, despite management's pretense of openness to new routes for the LOSSAN tracks, that it had to choose and we could present new ideas at the community forums, FOX NEWS reports that SANDAG has proposed four alternatives for relocating train tracks from the eroding cliffs of Del Mar, and public feedback will be open for nearly two months. Doesn't sound like openness to new ideas to me. I, and others I'm sure, feel doublecrossed.

On SANDAG's WEBSITE FOR E-COMMENTS ON LOSSAN CORRIDOR AND EIR, it claims "The LOSSAN Rail Realignment project proposes to improve resiliency and reliability of the segment of the LOSSAN Corridor within the cities of Del Mar and San Diego, where the rail line currently runs along eroding coastal bluffs." In fact, SANDAG was told to move the tracks off the bluffs.

And again, there are only four route options.

One option to leave the track in danger's path when SANDAG was told to get it off the bluffs which keep eroding anyway. And three options, all of which end up on the unstable, eroding beach below the Del Mar Fair and which have houses in the way which will either be terrorized by noise and vibrations from the underground tunnel beneath, have the yard taken over by ventilation shafts and other equipment, or the property expropriated outright.

And what of the people who get injured or have a heart attack in the long,

probably deep, tunnel?

Basically, you are transferring the route problem and the erosion problem from the Del Mar bluffs to the Solana Beach. Who's next? The houses that will have to be demolished? Beach facilities? Other cities?

After the April 5.2 magnitude earthquake near Julian, NCTD paused train service between Solana Beach and Sorrento Valley to ensure passenger safety and inspect the Del Mar Bluffs for any potential damage.

Yet another commuter delay, besides all the weekend closures.

Julian is 50 miles away. Tells a lot about SANDAG, concern for safety, and the sturdiness of its structures. Weak structures, unstable soil, SANDAG doesn't seem to have done a very good job of pre-planning. How long has this been in the works?

We need a hundred year LOSSAN plan, not ten. My suggestion is a train route going up the I-5 corridor to Oceanside, then following the existing light rail corridor through South Oceanside, then through De Luz area (avoiding the homes,) with spur tracks to Camp Pen and all, not something that will be eroded or flooded in 10 years. We can connect to LA and the bullet trains better that way.

Outlook

Pink and green lines

From Frank Wong [redacted]
Date Fri 6/27/2025 11:59 AM
To LOSSAN Comments <lossancomments@sandag.org>

"There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

From: jackie workman [redacted]
Sent: Wednesday, June 18, 2025 2:57:44 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Feedback Re Rail Through Del Mar

Attention SANDAG Rail Project Team:

I am writing to contest the proposed realignment options of the railroad via tunneling through the neighborhoods of Del Mar. The options lead to the destruction of homes, businesses, canyons, etc. The Blue Line would impact 60 plus homes and businesses. The Crest Canyon Line would adversely impact my home. Not everyone in Del Mar is able to easily move if demanded. I live here with my husband because my in-laws bought the house when it was first built, long before the city became wealthy. Being uprooted during the building of this railroad will decrease our quality of life both mentally and physically. Our property value will decrease which will impact our future and that of our son's.

On another crucial note, the Del Mar sandstone landscape is not designed to support tons of weight the trains would demand. The soil is always an important talking point when deciding how to remodel homes in this area. To consider a railroad system in these neighborhoods is ludicrous.

I implore you to consider the Northern Yellow Line which does not have any negative impacts on homes and businesses in Del Mar or Solana Beach. It meets all of the CEQA project objectives. It is also less expensive to build than any of the other routes by a substantial amount.

Thank you for your consideration.

Jackie Workman

From: [redacted]
Sent: Wednesday, June 25, 2025 6:08:37 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG,

This new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people per year, including myself, love and frequent very often. I've been supporting your efforts to relocate the train away from the failing bluffs for several years now, and do not understand why or how the decision was made to consider trenching into the bluffs and armoring the entire 1.7 mile stretch. This would destroy what remains of our natural bluffs. Meanwhile, armoring this entire stretch with seawalls would bring about the permanent loss of the beach because the seawalls would prevent natural sand replenishment and landward migration of the beach as sea levels rise into the next century and beyond. The existing seawalls are already accelerating erosion and beach loss, it is clear to see.

Simply put, there is no viable mitigation for destroying our bluffs and beaches because they are irreplaceable coastal resources. Beach replenishment is not durable over the long-term, and creates additional problems to mitigate including plugging up our nearby lagoons. For these reasons and because the Del Mar Double Track Reinforced Alternative disregards important sections of the California Coastal Act, I urge you to drop it from consideration and hold the course on your previous commitment to relocate the LOSSAN corridor off of Del Mar's eroding bluffs.

If you do end up studying this unlawful and environmentally destructive alternative, then you will need to ensure that the irreversible impacts to our bluffs and beaches - including the provision of recreational and aesthetic benefits to over 1 million visitors every year - are fully studied. This is not the least environmentally damaging option, the tunnel routes you're studying demonstrate that we can save our precious coastline and provide sustainable public rail transit at the same time.

Thank you.

Emma Wright

From: [redacted]
Sent: Wednesday, June 25, 2025 6:08:20 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

Please accept the following scoping comments re: the Updated NOP of a Draft EIR for San Diego-Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Realignment (SDLRR) Project (Project). As a San Diego County resident who frequents the beaches in and around Del Mar, I am extremely concerned with the addition of the Del Mar Bluffs Double Track Reinforced Alternative Alignment to this NOP. If pursued, this "non-tunnel alternative alignment" would lead to the unlawful and unacceptable destruction of over 1.7 miles of irreplaceable coastal resources, including bluff destruction and eventual permanent beach loss, along with the public's ability to access the beach.

The Del Mar Double Track alternative is inconsistent with SANDAG's previous commitments, most notably Coastal Commission Consistency Certification CC-0005-21. The Commission's approval of CC-0005-21's bluff stabilization work (DMB5) was fully contingent on SANDAG's commitment to begin the necessary work of relocating the train off the bluffs by 2035, which included a condition to remove the proposed seawalls once relocation was completed. Since then and until now, the LOSSAN team was making progress towards that goal.

Furthermore, the $300 million in state funding SANDAG received to fund this environmental impact report stipulates that the money must be used to plan for relocation off the bluffs. Technically, it is not permissible to use this state transportation money to study leaving the tracks along Del Mar's bluffs. Program Supplement 11SANDAGPS-04 to the Master Agreement between the CA Dept. of Transportation and SANDAG, signed by both SANDAG's Chief Financial Officer and CalSTA's Division of Rail and Mass Transportation Chief, states as its Project Summary that "this program supplement allocates $152,000,000 for the Project Approval and Environmental Document phase of a project to move a portion of the Los Angeles-San Diego-San Luis Obispo rail corridor in the City of Del Mar that faces risk of collapse from bluff erosion and realigns the rail corridor with a double track in an underground tunnel system through the coastal hill of Del Mar."

Studying the Double Track Reinforced Alternative is not only a misappropriation of state transportation funds, it is wasteful spending. The Del Mar Double Track alternative is impermissible under the California Coastal Act, which is the standard of review for federal consistency with the U.S. Coastal Zone Management Act. Why even pursue study of an alternative that is so clearly at odds with the Coastal Act and therefore unlawful? The Coastal Commission cannot approve this alternative for the following reasons, among others.

Because trenching and double-tracking along the Del Mar bluffs would be considered "new development" under the Coastal Act, it could never be approved as federally consistent by the Coastal Commission. Coastal Act Section 30253(b) requires that new development assure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. This NOP states that the Del Mar Bluffs Double Track would require "construction of bluff stabilization elements, including new and expanded seawalls," therefore cannot be lawful according to Section 30353(b) of the Coastal Act.

Meanwhile, Coastal Act Section 30235 makes clear that seawalls and other protective devices that alter natural shoreline processes may only be permitted to protect existing structures, and when designed to eliminate or mitigate adverse impacts on shoreline sand supply. Trenching the bluff and building a doubletrack to replace the existing single track comprises new development, not an existing structure, nor is there any way to effectively mitigate the permanent trenching and seawalling of 1.7 miles of bluff and beach. Beach nourishment is costly, leads to further

issues that require mitigation such as potential plugging of the Los Penasquitos lagoon directly south of the project area, and most importantly, cannot durably protect this beach from the increasingly erosive forces of projected sea level rise.

In conclusion, I urge SANDAG to eliminate the Del Mar Bluffs Double Track Reinforced Alternative Alignment from this Updated NOP and to continue towards a Draft EIR with the remainder of the proposed alternatives, all of which are less environmentally damaging to the beaches and bluffs that San Diegans and visitors rely upon for recreation and as economic generators. Furthermore, the tunnel alternatives comply with your previous commitments, the California Coastal Act, and the stipulations that govern how SANDAG is allowed to spend the state money allocated towards the environmental phase of SDLRR. Guaranteeing the future of the LOSSAN rail corridor cannot come at the expense of our beaches.

Thank you for the opportunity to comment.

Emma Wright

From: [redacted]
Sent: Wednesday, June 25, 2025 6:08:56 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b).

The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation.

Thank you for considering my comment.

Emma Wright

From: Shelley Scott Wright [redacted]
Sent: Wednesday, June 25, 2025 5:00:14 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team,

I've read that you are reconsidering your position to relocate the train tracks from the bluffs in Del Mar. This is very ill-advised as it would likely lead to total beach loss.

Organizations like Surfrider, the Coastal Commission, and California State Parks all oppose the Del Mar Double Track Reinforced Alternative and I hope you'll discard it from consideration. If you keep this option in the Draft EIR, all future potential costs should be studied and considered, along with the irreversible impacts to the bluffs, the beach, and public access to them.

Relocating the train away from the bluffs is the most sustainable, long-term solution.

Thank you for considering my comment.

Shelley Wright

From: Ze X [redacted]
Sent: Sunday, June 29, 2025 7:12 PM
To: LOSSANcorridor <LOSSANcorridor@sandag.org>
Subject: I support the Crest Canyon alternative

To whom it may concern,

It is crucial to keep San Diego connected to the rest of Southern California with robust transportation networks. As such, I call on SANDAG to use higher speed tunnels, with enough room for electric catenary wire. Simply reinforcing the bluffs is not enough, as we have seen time and time before, the ground underneath it collapses, making transportation even more of a struggle between San Diego and other points in Southern California. As such, the route needs to be moved further inland, as the Crest Canyon alternative does. This alignment also has the added benefit of shortening travel times between Oceanside and San Diego from 1 hour to 30 minutes. Such an impactful project should also enable future improvements, which is why I am calling upon SANDAG to also ensure that in this tunnel, there is enough room for electric catenary wire. This is not a huge amount to add to the cost of tunneling, and electric catenary wire is safer than hydrogen or diesel in a tunnel, as no engine fumes or explosion risk will be present with wires.

Thank you

Attachments: pastedGraphic.png

From: Kristin Yanicelli [redacted]
Sent: Sunday, June 29, 2025 7:02:53 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Cc: Michael Yanicelli [redacted]
Subject: SDLRR Project NOP

Michael and Kristin Yanicelli

539 15th Street

Del Mar CA 92014

To SANDAG,

My name is Kristin Yanicelli and my husband, Michael, and our family live at [redacted] 15th Street. We are concerned about SANDAG considering tunneling underneath Del Mar residences through sandstone, not granite, such as on the east coast. The Crest Canyon tunnel option being considered is directly beneath our home at 539 15th Street. Our home has both a subterranean level, built 20+ feet below ground, and a deep pool which could suffer structural damage with any tunnel digging and any consistent vibration from trains. We are also concerned about our homeowner's insurance being affected due to structural damage to the pool, which would cause a liability issue with homes down the hill from us. Our mortgage company is also not in favor of a possible devaluation due to any tunneling beneath our home. As far as we are aware, there have never been diesel freight trains in tunnels under people's homes anywhere is the USA or Europe and for good reason, pollution and health risks to our small community could be dire.

SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons.

SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, canyons and lagoons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible alternative as an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process."

I am writing this letter in support of the route residents are calling the "Northern Yellow Line".

"Northern Yellow Line"

The NYL route is described briefly as follows:

From the southern edge of the special events platform, the Northern Yellow Line turns east and runs along the southern edge of the Fairgrounds property rising in elevation until it reaches Jimmy Durante Blvd. It then crosses over Jimmy Durante Blvd on an elevated bridge and continues eastward across the southern edge of the Del Mar Golf Driving Range which is part of the Fairgrounds property (north of the San Dieguito Lagoon) until it crosses the lagoon on a bridge just west of the I-5. It then heads south under the I-5, emerging at the knoll south of Carmel Valley Road.

The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" is not a viable alternative because it does not satisfy the project objectives. This alignment concept was rejected after 2017 environmental studies revealed that this route would destroy Tier 1 protected habitat in the San Dieguito Lagoon. It would also destroy the planned Riverpath Del Mar connection between the Coast to Crest trail and the Crest Canyon trail. The Value Analysis statedone of the stated project objectives is to "Avoid and/or minimize negative effects …(on)… publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges…." The SANDAG "yellow line" route fails to meet this goal.

Another important project objective is to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow route shown on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The SANDAG "yellow line" route fails to meet this goal.

However, SANDAG Staff's recommendation of a route with a turn as it heads east to the I-5 does open the door for consideration and analysis of less expensive and less destructive nearby routes. The "Northern Yellow Line" (NYL) has many advantages that the SANDAG "yellow line" (and the other study routes) lacks. It also could cost a billion dollars less than the other recommended routes because fewer easements would have to be obtained and there would be less boring and tunneling.

The proposed "Northern Yellow Line" route offers the following advantages. It:

1. Preserves the San Dieguito Lagoon and restores the Penasquitos Lagoon
2. Has no negative impact on the City of Solana Beach
3. Has no negative impact on ANY homes or businesses in Del Mar
4. Has no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes
5. Runs entirely along the edge of state-owned property.

6. Eliminates expensive tunnels under private property and below sea level
7. Assumes the Fairgrounds will have their special events platform as planned
8. Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon
9. Allows for the future dismantling of the rail bridge currently in the Los Penasquitos Lagoon.

One of the stated benefits of the Fairgrounds Special Events Platform is the improvement of traffic and emissions. Less traffic means fewer parking spaces will be needed in the Fairgrounds parking lot. This extra space can be used for the railroad. Protecting homes must be prioritized over protecting a parking lot or a golf driving range.

I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the railroad that protects people, homes and businesses and our unique and rare and beautiful coastal environment.

Thank you,

Kristn and Michael Yanicelli

From: David yapo [redacted]
Sent: Wednesday, June 25, 2025 4:47:07 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: SDLRR Project NOP

Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment.

David Yapo
http://www.chefyapo.com
[redacted] SD, CA 92117

From: [redacted]
Sent: Friday, June 27, 2025 4:12:16 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: rail realignment project

Dear SANDAG Members;

After reviewing the four proposals for realignment of the railroad tracks project, I believe the best choice will be the Yellow route that runs along side Interstate 5 (I-5) for the following reasons:

1. It will cause the least effects to private property.

2. It will cause the least disruptions to the Del Mar Fairgrounds.

3. It will cause disruption to the citizens of Del Mar during and after construction with noise and vibrations.

4. Going through Crest Canyon will affect some private property and I don't know if Crest Canyon can take the construction and use as a sink hole developed in Crest Canyon a few years ago. The noise of the trains going through Crest Canyon day and night could be deafening and disruptive.

5. Keeping the train tracks on the unstable bluffs is costly and dangerous and a very bad choice in my opinion

If the railroad realignment is chosen and developed that runs along interstate 5, I believe some motorists stuck in traffic on interstate 5, seeing the trains moving rapidly past them, will be swayed to consider and use public transportation like the trains.

Yours truly,

John P. Zack

From: Zentella, Ana [redacted]
Sent: Saturday, June 28, 2025 1:10:43 AM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: No to track near our homes in del mar

Not healthy!. Disruptive noise and traffic for yrs. Lowering our property value.
Destroying our peaceful community.
PLEASE find another alternative.

Anna Celia zentella

Sent via the Samsung Galaxy A52 5G, an AT&T 5G smartphone
Get Outlook for Android

From: Joan Zinser [redacted]
Sent: Sunday, June 29, 2025 8:33:35 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: LOSSAN Rail Realignment Project

Dear Sandag Rail Project Members,

I am writing to express a strong opposition to the continued analysis of the Pink Line and Green Line routes for the rail realignment project. These routes pose significant environmental risks and lack support from the local community. I am a 50 year resident of the Del Mar Terrace neighborhood.

Pease consider the I-5 Knoll location for the southern portal. It has received strong support from both environmental groups and residents. It represents a far more responsible and community-backed solution.

Continuing to spend public funds on evaluating the Pink and Green Line routes—despite widespread opposition—constitutes a misuse of taxpayer resources. Please remove these routes from further consideration and focus resources on the I-5 Knoll alternative.

Thank you for your attention to this important community matter.
Joan Zinser

From: Eric Zoehrer [redacted]
Sent: Monday, June 30, 2025 9:34:31 PM (UTC+00:00) Monrovia, Reykjavik
To: LOSSAN Comments <lossancomments@sandag.org>
Subject: Train realignment

I am strongly opposed to any further consideration of the proposed Pink Line and Green Line routes. "There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you."

Letters

Boyko's Proposal On

Relocating the RR tracs in Del Mar

Submitted on May 20, 2025

To save the cliffs of Del Mar and prevent tunneling under the homes of Del Mar, I propose the following.

1. Relocate the Del Mar RR tract by extending the tracts from La Jolla and connect them to nonth bound Interstate 5 HOV lanes to the city of Oceanside.
2. Provide stations south of Via De La Valle Road, south or north of Santa Fe 5treet, north of Palamar Airport Road and City of Oceanside.
   Extend the station platform on both sides by one foot (this will suffice room for all passengers boarding and exiting the Train as long as only one train stops at the station. This will not move the I-5 lanes.
3. Construct escalators and stairs on north and south end of each station, add one elevator for easy excess for passengers that are Seniors. and disable passengers with wheelchairs.

4. Reinforce two underground tunnels to exit to sidewalk-where Buses, Taxis, Uber drivers and personal cars drop off and pick up with no overnight parking.
5. If needed, build a HOV lanes above the trains similar to Austin TX, and/or on I-15.
6. I'm not an artis and cannot provide you with a drawing of the project but if you allow me to work with your artist, I can describe the project in art form.

Michael Boyko
[redacted]
[redacted]

The Devil is in the Details.

I doubt if the vast majority of public opinions have been of much use, consisting of either NIMBY complaints or opinions based only on lines on a map or the favorable but superficial descriptions given to them. They are certainly short of having all the facts. I have been following the news about the progress of down-selecting to the current 5 options and I have been detailing and reviewing the pros and cons of each one. Everyone is stuck with Option 5 (i.e. doing nothing) until one of the other options has been selected and completed so the lengthier, complicated ones are at a disadvantage as they tend to be more expensive as well. So there is an incentive to speed things up.

I have not been privy to what went into the selection or how deep and detailed are any discussions made about the overall impacts of these options, including any 'side effects' of each one. The devil is in the details. I can see serious flaws in each one that must ultimately be addressed sooner rather than later (or be glossed over). One example I will only mention in passing is if the problem of dealing with the spoils that are removed from any tunnel has been satisfactorily solved. There will be many forms of pollution (particularly dust, noise and diesel fumes) associated with moving materiel around and the thousands of tons of the stuff that has to be removed and transported to some acceptable remote location. What method is planned, how long will it take, how much will it cost and will the environmentalists object and delay things further? I see any tunnel option as a local environmental disaster and public nuisance that will persist for a decade while those who are fixated on a tunnel will just see it as the cost of doing business.

I see grandiose, futuristic ideas of ultra-high speeds being attained using battery powered trains, major diversions and realignments and new stations along the way that duplicate what is already there. Before the tunnels and infrastructure have been completed and all of this has come to fruition, the bluffs will have eroded away leaving a permanent gap in the route (unless something more near-term is done).

Option 4 is a non-tunnel option and is preferred insofar as it is the simplest and most direct (almost a straight line over the approximately 1.7 mile section of track) and you can see where you are going. It avoids all the spoils problems and uncertainties associated with the tunnels. There are no changes in elevation either.

It should be much quicker and cheaper to complete. A modification to Option 4 overcomes its most serious problems (IMHO). Either variation of Option 4 could be completed years ahead of any of the tunnel options and cost billions of dollars less. The current description of Option 4 involves extensive reinforcements of the bluffs to accommodate the two tracks. This is made completely unnecessary in the modification. Have the proponents of option 4 resolved how much width at the top of the bluffs is needed for a double track and where it will come from? A deeper examination shows this Option (as it stands) to be oversimplified and not practical as follows:-

Reinforcement of the bluffs is expensive, time-consuming, and a losing battle. It will require periodic maintenance because parts of the bluffs will still be exposed to the elements and be prone to degradation and collapse. Unless drastic action is taken, there is insufficient width at the top of the bluffs to accept two tracks. Take the area where the current track is already quite close to the edge, where would the second parallel track go? Moving 'inland' requires acquisition and grading of the property and the existing track is still near the edge of the bluffs. Move the second track 'outward' and it is hanging in mid-air! Is this second track going to be supported by a massive buttress of concrete and steel that would encroach onto the beach for its whole length? (I once suggested to a now-retired SANDAG member that such a buttress support could be built for the existing track and to bring in Disney 'Imagineers' to contour the face of the support to mimic the appearance of the bluffs behind it to keep everyone happy. There have been much worse ideas!)

A little more detailed thought and some common sense leads to an obvious timely solution that has so far been ignored or at least been met with resistance. Rather than sitting the second track on the top of a massive support structure, move both tracks completely off the bluffs onto an adjacent bridge or viaduct that parallels the existing track on top of the bluffs. Vacating the bluffs was an original goal for SANDAG anyway. The 'gold standard' for enabling roads and rails to by-pass unstable and inaccessible areas is a bridge/viaduct anyway. They are used all around the world. A viaduct is eminently suitable and superior in all aspects in this case. It also obviates the need to reinforce, maintain or even touch the bluffs, saving time and money. The bridge could probably be built before the extensive reinforcement of the bluffs was completed. The bluffs would be left alone to

naturally degrade in their own time and the old track bed could be made accessible to the public.

A viaduct can have bad connotations if it reminds anyone of the Hanford viaduct being built in the desert for the high speed train. This concrete monstrosity is an eyesore whereas there are many elegant, low profile styles to emulate. (I can provide examples.) This bridge would be shorter than the Coronado Bridge for example, be on one level and be much simpler to build. One design in particular is aesthetically pleasing and well suited here. It could be modular and built offsite and just erected as needed at the base of the bluffs. The widely spaced columns would have their footings buried under the sand and barely impact the beach. (A complete sequence of events has been worked out. There are no technical barriers to this idea.)

A comprehensive unbiased 'pros and cons' list (including realistic costs, timelines and potential problem areas) would show this to easily be the best technical and engineering solution. This sort of thing used to be my forte so it should not be summarily dismissed out of hand.

Additionally, while on this subject, another tunnel has been proposed to bypass the Miramar Loop. Again, bridges are more versatile and are the preferred structures for transportation. Consequently, it should make sense to evaluate a similar double-tracked viaduct to circumvent the Miramar Loop. It would mean that trains could sweep past the Loop at full speed to improve the LOSSAN service, instead of leaving the trains to crawl around the Loop on a single track perched on an unstable ledge at about 10-20 mph. The proposed tunnel shortcut is touted to save 6-7 minutes in travel time over the current path. The double track would be on one level over the canyon and the time savings claimed for the tunnel shortcut is minimized by the superior speed possible on the bridge. Once again all the uncertainties of digging a tunnel and facing unforeseen problems from bypassing the Loop this way are eliminated.

It appears that thousands of hours have already been spent on investigating and promoting different tunnels, both at Del Mar and Miramar, trying to justify them as though they were only the only viable options and very little or no attention has been given to other alternatives for one reason or another. Tunnels are usually

chosen as a last resort when there are no other viable options. I have shown that there are other options in these two cases and if an unbiased, bona fide effort was expended to look at the bridge options in as much depth as the tunnels have received, I'm sure many minds would be changed. Option 4 is flawed as are all the tunnel options, but the bridges offer a quicker, cheaper, safer way to bypass the problem areas.

There is no doubt that the modified Option 4 (with the bridge bypass) is, by far, the fastest way to get the trains and track off the bluffs. If this was coupled with the construction of the bridge bypass around the Miramar Loop, there would be no remaining obstacles to prevent having a continuous double track from at least Carlsbad to south of the Loop and on to Downtown in a reasonably short time - without the complications associated with tunnels. Those remaining lengths of single track seem to have sufficient real estate around them to readily allow double tracking.

Respectfully,

Michael Featherby, Ph.D.

[redacted]

May 21, 2025

SANDAG

Attn: LOSSAN Comments

1011 Union St. Suite 400

San Diego, CA 92101

To-whom-it-may-concern,

My husband and I recommend the I-5 Knoll Portal option for the following reasons.

KEY ENVIRONMENTAL CONCERNS

1. Groundwater Disruption
   - Tunnel construction can alter the local hydrogeological balance. Tunnels may act as drains, potentially lowering the groundwater table and impacting nearby vegetation and water-dependent habitats.
   - While modern tunnel linings can minimize groundwater drawdown, temporary changes during construction may still occur, especially if tunneling passes beneath or near water bodies.

2. Soil Stability and Ground Movement
   - The use of tunnel boring machines (TBMs) and excavation can cause soil disturbance, leading to ground movement, settlement, or even subsidence above the tunnel route. This can threaten the stability of nearby homes and infrastructure, particularly in areas with older or fragile buildings.
   - Soil stiffness degradation from tunneling may increase ground-borne vibrations during future train operations, potentially by up to 10 decibels, which can be disruptive to residents and damaging to structures.

3. Vibration and Noise
   - Both the construction phase and subsequent train operations generate vibrations and noise that can propagate to nearby buildings, disturbing residents and potentially affecting the usability of sensitive buildings (e.g., schools, hospitals).
   - These effects are most pronounced directly above or near the tunnel alignment.

4. Air Quality
   - Underground tunnels can accumulate particulate matter and other pollutants due to limited ventilation. Studies in other cities have shown that stations and tunnels,

especially those near water bodies, can have significantly higher concentrations of harmful particles.

- These pollutants include iron, manganese, and other metals from train operations, which may pose health risks if not properly managed.

5. Construction Impacts

- Construction activities will bring increased noise, dust, and heavy vehicle traffic to the area, potentially for several years.
- There is a risk of accidental damage to adjacent properties, including cracking or collapse, especially if controlled explosives are used or if the soil is unstable.

6. Habitat and Ecosystem Disruption

- While tunneling generally has less surface impact than above-ground rail, there may still be disruption to local habitats during construction, particularly if staging areas or ventilation shafts are placed in sensitive locations.
- If not carefully managed, changes in groundwater flow could affect local flora and fauna.

COMMUNITY CONCERNS FOR ADJACENT CITIZENS

- Structural Damage: Residents should be concerned about the risk of settlement, cracking, or other structural impacts to their homes and businesses from ground movement during tunneling.

- Noise and Vibration: Both during construction and after the tunnel opens, increased noise and vibration could affect quality of life and property values.

- Air Quality: Poor ventilation in tunnels can lead to higher concentrations of airborne pollutants, which may be released into nearby stations or ventilation shafts, impacting respiratory health.

- Water Table Changes: Lowering of the groundwater table could affect landscaping, trees, and possibly the foundations of some buildings.

- Construction Nuisance: Expect years of construction-related disruptions, including dust, noise, increased traffic, and potential road closures.

- Emergency Preparedness: Tunnels introduce new risks, such as fire, hazardous material spills, or derailments underground, which require robust emergency response .

As citizens, since 1978, living adjacent to the proposed Del Mar rail tunnel realignment we will be vigilant about the risks of ground movement, noise, air quality, and water table changes. While modern engineering can mitigate many impacts, careful planning,

transparent communication, and robust monitoring are essential to protect community health and property throughout the project lifecycle.

Final thought- living here for 47+ years, we remember vividly the rebuilds of both bridges on Camino Del Mar/ Torrey Pines Road (one opening to the lagoon, the other over the railroad tracks). The all night long pounding of the pile drivers was but one, albeit huge, disruption to wildlife and citizens alike. It is for all the reasons listed above that we urge choosing the 1-5 Knoll Portal alternative.

Concerned citizens,

Nancy M. Lendaro V L Lendaro

Nancy MacIsaac Lendaro &
Valentino L. Lendaro, Ret. Col, USMC
[redacted]
Del Mar, CA 92014
[redacted]
[redacted]

Comments Submitted on Social Pinpoint

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
9219	Jul 01, 2025, 10:54 AM	DENINE Henry	Please consider the impact the tunnel with port holes going through our small city will do .I don't understand the reasoning behind the two routes closest to the bluff since it's going to cost a lot of money. Why so close ? Even one of your engineers I had talked to didn't understand why. Sincerely DENINE Henry
9218	Jul 01, 2025, 07:42 AM	Michael Ulrich	Please move the train off the bluffs. You need to think of a long term solution not a temporary one like reinforcement of the bluffs. Choose one of the realignment options that is more inland
9217	Jul 01, 2025, 06:03 AM	Jesse Clark	We need a safe and reliable train route that is future proof. Build a double track tunnel/route through Crest Canyon that includes room for electrification.
9216	Jul 01, 2025, 12:33 AM	Daniel Larsen-Anderson	Build the tunnel and leave room for the catenary! A project like this only happens every several decades, and if we don't take this opportunity to improve the infrastructure for passenger rail through this corridor, we never will. This is the second busiest Amtrak corridor in the country, and with proper investment, that ridership is bound to go up. We need to do everything we can to improve service now and in the future along this route, including high speed, double tracked alignments at Crest Canyon and Camino Del Mar. This is an important corridor, not just to passengers, but to freight companies and the US military. We can not fumble this.
9215	Jul 01, 2025, 12:05 AM	Brianna Egan	Thank you for taking public comment under consideration for the proposed alternatives. I am writing in support of the Crest Canyon and Camino Del Mar options, which will support double-tracked and higher speed service on the LOSSAN Corridor. Of the two alignments, my top preference is for Crest Canyon which will support 110 mph speeds and avoids impacting habitat in the Los Penasquitos Lagoon. When I attended college at UC San Diego, I relied on the rail line for weekend commutes to Los Angeles and benefitted from its service for travelling without a car. Let's prioritize current and future riders in planning for resiliency and reliability. It is critically important that SANDAG plans for this hundred-year project by making the tunnel heights high enough to enable the line to be electrified with overhead power. Electrification of passenger rail is a priority in the California State Rail Plan, and due to unclear reasons, likely political, the LOSSAN Corridor was not identified for electrification. This is a chicken-and-egg problem, with no agency taking responsibility for this, and it's important right now to define the vision for the rail line. Hydrogen is simply not a viable option for power -- sourcing is difficult, mostly coming from fossil fuels, energy inefficiency and water use are untenable, and it poses dangerous safety risks especially used in tunnels. To provide world-class service on the Surfliner and Coaster, electrification must be a priority. There are no incompatibilities between overhead electrification and the Coastal

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			Act. In fact, recent law now exempts passenger rail electrification infrastructure from CEQA review, reducing the barriers to adoption. Electrification will enable the faster trips that are competitive or beat driving travel times, higher frequencies, and will offer numerous environmental and public health benefits as well. It is critically important that we double-track and future-proof this line by rerouting away from the bluffs, double-tracking, and leaving ample space in the tunnels for catenary electrification.
9214	Jul 01, 2025, 12:00 AM	Ian Maxon	Please choose a tunneled alignment that is tall enough for an electric catenary, and not another band-aid. If this was I-5 being shut down every few months, there would be an uproar. Without consistent and reliable rail service through Del Mar, more and more people will choose to drive instead of taking the train. That is a serious environmental impact that shouldn't be underestimated simply because it is hard to quantify.
9213	Jun 30, 2025, 11:58 PM	Alexander Berryhill-Williams	Dear SANDAG, I am writing to support the Under Crest Canyon alternative for the LOSSAN Rail Realignment project. I am a resident of San Diego County and a regular Coaster rider, so this project is incredibly important to me. I have carefully reviewed the updated Notice of Preparation, the Value Analysis study, and other project documents, and I believe that Under Crest Canyon is the best available option for relocating the tracks through Del Mar. I support the Under Crest Canyon alternative as it is the only alternative that currently supports 110mph speeds. Faster speeds and shorter travel times are crucial to improving passenger experience, making rail travel competitive with driving, increasing ridership, and creating a true world-class passenger rail network for San Diego and Southern California. Combined with the future Miramar Tunnel, this alternative will create a continuous 9 mile stretch of 110mph track from Solana Beach station to the future UTC station. I believe this is the most important stretch of track between San Diego and Oceanside, as it serves as the primary connection from San Diego to North County and the rest of Southern California. Both Coaster and Surfliner trains will be able to take full advantage of these speeds through this segment, greatly reducing travel times. Conversely, I am very concerned about the lower-speed curves and longer alignment of the San Dieguito Bridge to I-5 alternative. This alignment has speeds as low as 30mph, slower than the existing alignment, with has speeds only as low as 50mph. Because of its late addition, travel times have not been provided for this alternative, and I am concerned that this could result in greatly increased travel times. It is extremely important that this project improve travel times, not make them worse.

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			I also urge SANDAG to ensure the tunnels are built wide enough for overhead catenary electrification. Current plans call for reduced tunnel diameter with insufficient space for overhead wire, making future electrification impossible. Electrification of the LOSSAN corridor is necessary for true zero emissions service, higher speeds, faster acceleration, and reduced operational costs. Building these expensive tunnels without leaving room for future electrification would be incredibly short-sighted for a relatively small short-term cost savings. The full tunnel width must be studied in the Environmental Impact Report, along with the long-term and corridor-wide impacts of permanently precluding electrification. Thank you for your time and consideration. The outcome of this project will have a huge impact on San Diego County, and we must ensure that it is for the better and not for the worse. I look forward with anticipation and hope to the outcome of this environmental review process in the coming years. Best, Alexander Berryhill-Williams
9212	Jun 30, 2025, 11:49 PM	Matthew Barba	As an occasional rider of the Pacific Surfliner, and as a transit advocate, I'd strongly implore SANDAG to please consider the Crest Canyon Alignment for the realignment of the rail tracks. I believe it is the best option not just for San Diego, but for all of southern California. Allowing for higher speeds is imperative forward action that we need to prepare for more future services, and I really hope that enough clearance is made in the tunnel to potentially allow for catenary wires so that we can potentially electrify this vital corridor. This is a decision that will affect the region for decades, and I strongly believe that the best choice for southern California is the Crest Canyon alignment. Thank you for reading
9211	Jun 30, 2025, 11:32 PM	Samuel Mendez	As a committed public transit user, environmental advocate, and rail enthusiast, I write in strong support of the Pacific Surfliner tunnel realignment project and specifically urge decision-makers to adopt the Crest Canyon alignment as the preferred route. The Pacific Surfliner is one of the most important transportation links in Southern California. With rising sea levels and rapid coastal erosion threatening the current rail line through Del Mar, this project is not only necessary, it is urgent. The Crest Canyon alignment offers the best balance of speed, environmental stewardship, and long-term sustainability. It allows for train speeds up to 110 mph, improving service and cutting travel times. It also minimizes disruption to sensitive habitats when compared to the Camino Del Mar and I-15 alignments, which would impact the Los Peñasquitos and San Dieguito Lagoons respectively.

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			Additionally, it is critical that these tunnels be built with sufficient vertical clearance to accommodate future electrification, including overhead catenary infrastructure. According to SANDAG, electrification is key to reducing travel times between Oceanside and San Diego to just 30 minutes—a transformative improvement. Designing tunnels that preclude electrification would be short-sighted and incompatible with our state's clean transportation goals. There is a mistaken belief, as implied by NCTD and echoed by some opponents, that overhead catenary and the California Coastal Commission's concerns about "aesthetic preservation" are inherently at odds. I respectfully disagree. Catenary systems are widely used around the world—even in coastal and scenic areas—and do not significantly detract from the natural environment. They are a practical and proven tool for modernizing our passenger rail system. More importantly, electrification is also safer than the currently proposed future use of hydrogen-powered trains. While hydrogen propulsion is an intriguing idea, it remains largely unproven in real-world operations at the scale required here. Countries that have tested hydrogen trains have reported performance limitations and reliability issues. If NCTD proceeds with this alternative, we the public must trust that they are investing additional billions in the necessary infrastructure to store, process, and handle hydrogen safely. This includes robust tunnel safety planning to address risks such as fire or explosion, risks that would be far less likely with a conventional electrified rail system. Further, both the Pacific Surfliner and Coaster services envision a future schedule with up to four trains per hour per direction, a level of frequency that makes electrification not just viable, but economically sound. NCTD's apparent pivot toward hydrogen suggests a retreat from that vision of high-frequency service, which is the opposite of what Southern California needs to meet climate, congestion, and equity goals. Finally, while the concerns of Del Mar residents should be heard, they must be weighed in proportion to the broader public interest. Del Mar has a population of roughly 4,000, while the Pacific Surfliner served approximately 2.8 million riders annually in 2018 and again in 2019 before the COVID-19 pandemic. We cannot allow a small municipality to hold the long-term interests of the region and millions of riders hostage. This project is a rare opportunity to not only protect a vital rail corridor, but to build it

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			smarter, greener, and more resilient. I strongly urge you to proceed with the Crest Canyon alignment, ensure that the design allows for overhead electrification, and remain focused on delivering safe, reliable, and high-frequency rail service for generations to come.
9210	Jun 30, 2025, 11:29 PM	Sean	Hello, The Pacific Surfliner is the second most used rail line in the United States and most used in California. It is good this realignment is happening, but there needs to be some kind of stipulation or language in the draft proposals which mandates the tunnels be large enough for overhead electrification in order to future proof the line. The tunnels are built inadequately now this may lock the Surfline out of electrification for the next century.
9209	Jun 30, 2025, 11:11 PM	Cian Ormond	Regardless of whichever alternative is selected, it is necessary that there is space for future overhead wire electrification. Overhead wires are the best way to meet California's climate goals and ensure reliable service. Just look at how much CalTrain's service has improved since electrification! Hydrogen is not the future, and battery electric locomotives are not as efficient, good for the environment, or cost effective as overhead wires. Please choose the Crest Canyon alternative. I exclusively use public transportation to get around, and would love to be able to depend upon Surfliner as a reliable, frequent train service, but it's not reliable. The second most popular rail corridor in the country deserves the best, and Crest Canyon harms the wetlands the least.
9208	Jun 30, 2025, 10:59 PM	Dexter Friedman	Dear SANDAG Board Members, I am writing as a San Diego County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Dexter Friedman [redacted] San Diego CA, 92110 [redacted]
9207	Jun 30, 2025, 10:55 PM	Alan Friedman	Dear SANDAG Board Members, I am writing as a LA County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Alan
9206	Jun 30, 2025, 10:11 PM	Michael Manahan	Hello, I'm sharing my support of the Crest Canyon option with hopes that there will be space for overhead wires for future electrification. Seeing how much Southern California has been affected by closures due to erosion, I hope that this project will not only help reduce such possibilities in the future but also improve travel times. Thank you for your consideration.
9205	Jun 30, 2025, 09:37 PM	Brian Legal	Hello SANDAG! I would like to comment in support of the Crest Canyon option for the Del Mar rail realignment. As a North County resident who goes between Oceanside and San Diego, I believe that the increase in reliability and speed that the Crest Canyon alignment brings will improve the rail corridor. In the past year, I have many disruptions by the San Clemente bluffs blocking the rail. I would like to see SANDAG choose the Crest Canyon so that these reliability issues have no possibility of happening in Del Mar in the future. The faster speeds enabled by the Crest Canyon option would allow the Coaster to be more competitive with driving when comparing travel time. The no build, reinforcement, and Knoll alternatives would be especially short-sighted investment, and not a proper long-term solution to the corridor. These options would not be the best investment of taxpayer money because of their slower speeds and reliability when compared the price of Crest Canyon. As a final note, please consider making the tunnel compatible with overhead catenary, so that the tunnel is ready for electric trains if and when the time comes. Thank you for all your guys' work into this project and considering all of the public input.

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			Best, Brian Legal Oceanside, CA
9204	Jun 30, 2025, 09:35 PM	Alexander Laskowski	TLDR: 1. Choose Crest Canyon Alignment, double tracked, allowing for 110 mph speeds 2. Make the tunnels wide enough, so in the future catenary can be installed. Hello, I'm writing my support for the Crest Canyon alignment, specifically one that is double tracked and allows for 110 mph speeds, as it is the best possible route for the future of the LOSSAN corridor. The no build and reinforcing the existing ROW option are absolutely out of the question. The LOSSAN corridor is already plagued with closures due to erosion along the Del Mar Bluffs, hence the purpose of the proposed tunnels. Letting the tracks sit where they stand will guarantee more closures, and risks an indefinite closure of the line entirely if a major bluff collapse occurs. Given that the LOSSAN corridor has the 2nd highest ridership in the country, connecting the 2nd and 8th largest cities in the U.S. we have to build a tunnel. While better than the no build and reinforced ROW alignment, the San Dieguito to I-5 alignment is a poor choice, only being proposed to placate wealthy NIMBY residents living in Del Mar, and offers no real advantage versus the other viable options of going under Crest Canyon or under Camino Del Mar. In comparison, the Crest Canyon alignment could potentially allow for speeds up to 110 mph along the section, while the San Dieguito I-5 alignment would require two 30 mph curves, slowing down travel times, despite the price being similar if not more expensive. There is also the fact that the San Dieguito to I-5 alignment may also have negative environmental impacts on the San Dieguito Lagoon I also dislike Camino Del Mar alternative, as there are concerns with it impacting Los Penasquitos Lagoon, while the Crest Canyon has the least impact. However, the Camino Del Mar alignment is still preferable to the I-5 alignment My other request is that SANDAG designs the tunnels to be wide enough to have room in the future to install catenary for electrification. While I do acknowledge that there is significant upfront cost to installing catenary, we would be shooting ourselves in the foot if we did not at least make room for it in the tunnels. With electrification, tunnels, and

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			upgrading track to allow for speeds of up to 110 mph, travel times between Oceanside and San Diego could be under 30 minutes, halving the time it currently takes, and would be faster than driving. As seen with Caltrains electrification in the Bay area, doing this would see a significant increase in ridership. I have heard that the reason there might not be plans to add clearance for overhead wires, is that NCTD may be only considering hydrogen powered trains. I disagree with this choice as there are several problems with hydrogen trains relating to cost, infrastructure, and safety, particularly in tunnels. Electrified rail is the standard for high quality rail service, and is a proven and reliable method to power trains. I have also heard that the coastal commission is opposing catenary due aesthetic concern about the wires. I think this is a frivolous concern, given that switching over to sustainable modes of transportation would help the health of the coast far more than concerns over looks. In no way would catenary be in conflict with the coastal act. I once again state my support for the Crest Canyon alignment, and the future electrification of the LOSSAN corridor.
9203	Jun 30, 2025, 09:29 PM	Michelle Brieske	Negative impacts on both the community and the residents for the proposed Alternative B and C. 1. Safety Concerns: Accidents or derailments could pose serious threats (short and long-term) to residents living above a tunnel. Particularly, in the event of a serious accident within the tunnel involving chemicals. hazardous, and/or miliary explosive material. 2. Property Values: Homes located directly above or near railroad tracks may experience decreased property values due to the safety concerns (above) making them less desirable to potential buyers. 3. Community Division: Building railroad tracks under housing could create a physical barrier within the community, potentially dividing neighborhoods and affecting social cohesion. 4. Disruption during Construction: Causing traffic congestion, noise pollution, and inconvenience to residents and businesses. 5. Alternative Options: Considering alternative routes or methods for the railroad tracks, such as elevated tracks, rerouting away from residential areas, water. 6. Long-term Economic Impact: Reduced tourism, higher insurance costs for residents, and potential reluctance of businesses to invest in the area due to perceived drawbacks. Tunneling thru a community entails significant risks related to geology, environment, cost, public acceptance, and operational challenges.

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			1. Geological Stability: Southern California is seismically active, prone to earthquakes and landslides. Building tunnels in such terrain requires careful engineering. How will you ensure stability during both construction and operation? 2. Cost Overruns: Tunnel projects are notorious for cost overruns due to unforeseen geological conditions, environmental challenges, and construction complexities. How are cost being managed? 3. Environmental Impact: Construction and operation of tunnels can disrupt sensitive coastal ecosystems. What plans do you have in place to mitigate these impacts? 4. Traffic and Transport Disruption: Construction of tunnels could disrupt existing roadways and traffic patterns, leading to congestion and logistical challenges. How will disruption impact local communities and businesses? 5. Maintenance and Operation: Tunnels require regular maintenance to ensure safety and functionality. Coastal tunnels may face additional challenges such as saltwater intrusion, corrosion, and erosion, necessitating ongoing monitoring and upkeep. Are these expenses accounted for? 6. Emergency Preparedness: Coastal tunnels must have robust emergency response plans in place due to the potential for incidents such as flooding, fires, or accidents. What safety measures and infrastructure for emergencies will be in place, and how will you ensure residents are protected? Careful consideration of alternative solutions that minimize impact to the community well-being are crucial. Alternative A the A I-5 Alignment is best alternative solution with minimal impact to safety of local communities and residents, environmental impacts, noise pollution, and disruption to daily life.
9202	Jun 30, 2025, 09:00 PM	Michael LaDouceur	Any alternative that leaves the tracks along the bluff should not be studied further. Climate change and sea level rise will eventually destroy the billion dollar+ investment. Keeping the tracks on the bluff will push the issue to our future generations and it is not a responsible use of public funds.
9201	Jun 30, 2025, 08:55 PM	Maia Lazar	Dear SANDAG Board Members, I am writing as a San Diego County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph

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			capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Maia Lazar [redacted] Los Angeles, CA 90039 [redacted]
9200	Jun 30, 2025, 08:51 PM	David Brown	The Del Mar Double Track option is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Furthermore, the Under Crest Canyon option is the most environmentally suitable that expedites construction and preserves the most natural resources. Routes lining San Dieguito Lagoon does not take into account rapid sea level rise in the next century and will need to be replaced/repaired in decades.
9199	Jun 30, 2025, 07:46 PM	Helen Sperling	Hello, Seeing what's already happening at Del Mar beach with the temporary seawalls re-enforces my belief that the public will be greatly impacted longer term if the tracks are not moved inland and away from the bluffs. I'm concerned the temporary seawalls may lead to a permanent set of seawalls and ruin the beach forever. Thanks for your consideration.

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			Helen
9198	Jun 30, 2025, 06:03 PM	Marian Hukle	I am a regular user of the Surfliner and Coaster, in fact we rely on this essential service. I have been nothing but frustrated by the many delays, cancellations and the slowness of this line. I am not going to ride a bus bridge, and do not own a car so this inconsistent service means I can not travel out of San Diego to visit other parts of California. I have traveled in Europe and Asia by rail which is first rate and it is about time we bring our transportation into the modern age. I am in favor in saving the 2nd busiest rail corridor in the US by building the tunnel alignment with room for double track and electrification. Electrification would make this route faster and cleaner. I implore you to do what is best for the future, not be dragged down by naysayers who only want to protect their personal interests.
9197	Jun 30, 2025, 05:55 PM	Julia Ralston	I sent in extensive comments on a previous occasion when you were seeking public comments in 2024. Any options other than running the track along I5 must be eliminated. In particular, the pink and green lines must be eliminated because of the impact to the Los Penasquitos Lagoon. It is unimaginable that a nature area attached to the Torrey Pines State Preserve would be impacted and compromised by double train tracks and extended, related construction. These lines also clearly do not have the support of the local community, whose investments and lives would be severely impacted. Surely local tax payer opinion matters. I am quite sure the I5 option has stronger community support and the most minimal environmental impact and urge you to focus further planning efforts there, and certainly eliminate the pink and green lines. Thank you.
9196	Jun 30, 2025, 05:55 PM	Erik Hansen	We have to bring it inland and tunnel. The extra few minutes will be incredibly valuable in getting cars off the road and we need to make sure the new tunnels are easy to transition to HSR. High speed rail is inevitable eventually and continually spending money avoiding the inevitable is wasting money. We can meet our climate goals and lessen traffic and move people faster but we need to prepare for the better future.
9195	Jun 30, 2025, 05:55 PM	Malachi Bielecki	Protect our coastline, beaches, and transit resiliency! Please DO NOT proceed with the Del Mar Bluffs Double Track Reinforced Alternative Alignment (green) or No Project Alternative. A cursory reading suggests an I-5 alignment might make the most sense, but SANDAG should pursue the most cost-effective alternative to direct coastal alignment.
9194	Jun 30, 2025, 05:42 PM	Ben Mathews	This is a serious project whose construction should not be resisted or delayed by NIMBYism and a disdain for transit! Need either the Crest Canyon or Camino Del Mar alignments! Don't build a bunch of new infrastructure because of whiny rich people! And electrify that tunnel!

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9193	Jun 30, 2025, 05:33 PM	Destin Dinh	Dear SANDAG and readers, My name is Destin and I am currently a student at UC San Diego. As my family lives in Los Angeles, I have the privilege of traveling back during the school year to visit them. I particularly travel in order to visit my grandparents, who have shown me their support throughout my childhood and growing up as a teenager. Through the AMTRAK railway system, especially between the greater metropolitan area of San Diego and Los Angeles, I have been able to explore and take advantage of a more affordable and relaxed method to visit my loved ones. However, I was affected by the recent railway closures near Del Mar in Spring 2025, as I had intended to use the AMTRAK to travel back. Through this, I was unable to find a great mean to travel back home, and therefore lost out on time I could have spent conversing and catching up with my family and friends, and especially with my grandparents. The nature of the railway system being along the coastline must be put into the forefront and must be addressed accordingly, as it destabilizes a form of travel that has been so important since its establishment to commuters of all kind. It must be pointed out that along with the AMTRAK railway, there are only two existing major highways leading from Los Angeles to San Diego, being the 5 and the 15 Freeway. The loss of the AMTRAK forces more cars onto the highways, and consequently leads to more traffic and the greater chance for dangerous situations to occur on the motorways. I strongly urge you to consider moving forwards with the LOSSAN Rail Realignment project, as it will not only aid countless commuters in finding a stable and non-fluctuating way to commute, but also aid in reconnecting families and loved ones, just as the railway system has done for me. Thank you for your time, Destin Dinh
9192	Jun 30, 2025, 05:28 PM	Christian Lietzow	I currently live in Santa Barbara, California. I live a few minutes away from the Goleta Amtrak station, and I deeply enjoy riding the Pacific Surfliner whenever I get the opportunity. It is a comfortable and enjoyable experience riding the train through Southern California. The LOSSAN Corridor has undergone various changes over the past decade to accommodate the ever-growing demand for passenger rail in California. With more people wanting to take the train on one of America's busiest rail corridors on the West Coast, the LOSSAN Corridor needs to make efforts to be fast, reliable, and efficient for everyone who uses it. To reflect these goals of the corridor, I am voicing support for the 'Under Camino Del Mar' alignment. This alignment will allow for the lowest construction costs while still providing great benefits and minimal impacts. Most of my references in this public

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			comment stem from the attached Post Value Analysis Study Assessment. Because the Camino Del Mar alignment has the shortest tunnel out of the three tunnel alignments, this will likely make the project easier to build and reduce the chance of delays and cost overruns. In addition, a smaller tunnel would also mean it would be easier to maintain, potentially reducing long-term maintenance costs. It is pointed out in the I-5 and the Crest Canyon alignments that there are potential concerns about higher maintenance costs because both alignments have more curves. This could lead to potential risk and hurt the chances of the project getting government support. Getting funding for such an essential project is important to get it built on time and on budget, which is critical due to the continually growing risks of coastal erosion on the current alignment along the bluffs. Speed is also critical for this project to make the LOSSAN corridor a true higher-speed rail corridor. With the planned Miramar Tunnel and potential speed increases on this section of the LOSSAN corridor, ensuring the line permits consistent high speeds to reduce travel times will likely be the most effective way to get more people to take the train over driving. Because of plans for trains to run at 110mph on various parts of the corridor, keeping to this speed is critical to reduce travel times. This is my biggest criticism of the Camino Del Mar alignment, since trains would only be allowed to go 90mph in the tunnel. This is why I do have a preference for Alternative 16C since it is straighter and would allow 110mph operations. I do acknowledge that part of this change is because of the reduction in getting subsurface easements. I do not know what risk is associated with obtaining government funding for getting additional easements, but I feel like this concern is being taken more seriously than it should be. There are transit systems across the world where trains run directly under residential and commercial buildings with little to no impact during operations. I am currently staying in Washington, DC, where DC Metro trains run directly underneath where I am staying, and I do not notice any vibrations from the trains, both inside and outside. You can hear the trains because of ventilation from the tunnels up to the street, but since the proposed tunnel will not have any stations and will be single-bore, ventilation will likely not be needed for the tunnel, meaning there will likely be little to no impact from trains passing under Del-Mar. If the risk associated with building the tunnel under more houses is high, then it is understandable why Camino Del Mar is being considered. However, in my experiences with being in a city with train tunnels directly underneath major buildings, the trains have little to no impact, which is why I believe Alternative C should be considered once more.

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			I will mention that all passenger trains do stop at Solana Beach, so trains may still be accelerating up to 90mph when going through the tunnel, minimizing the impact of reduced speeds. However, if the LOSSAN Corridor were ever to be electrified in the future and equipped with faster-accelerating trains, this could then become a bigger concern down the road. America deserves faster trains, and this project could be the gateway for Surfliner trains being able to run up to 110mph for the first time, making it the fastest non-high-speed rail train on the West Coast. When looking at the other alignments around speed, despite the Crest Canyon alignment allowing 110mph operations, it is more expensive than the Camino Del Mar alignment for little additional benefit. Doing the Del Mar double track alternative would also be a major mistake because it is stated that there would be no improvements to speed or travel times, while still having potential risks of coastal erosion, potentially leading to no improvements in service reliability on this specific segment of the LOSSAN Corridor. This also makes the I-5 alignment a bad idea since $4-5 billion would be invested for a rail alignment that would not improve travel times and lead to a major slow point on the LOSSAN Corridor at the proposed 30mph curve. This project needs to get as much benefit as possible because of how expensive this project will be. The Camino Del Mar alignment is the cheapest and will lead to improvements in travel times while reducing risk to maintenance requirements and rail operations. The I-5 alignment would see no improvements to travel times and potentially lead to higher maintenance costs as specified in the analysis, because of the various curves. The I-5 alignment is easily the worst tunnel option out of the two other options and should not be considered. The other alignments have significantly better travel times for less money, making them overall better; and as mentioned before, Camino Del Mar would have even more benefit since it has fewer subsurface easements than Crest Canyon, getting it relatively close to the one main benefit of the I-5 alignment. The I-5 alignment solely focuses on mitigation in Del Mar at the cost of the quality of the LOSSAN Corridor and the affordability of the project in the short and long term. The last thing I would like to mention is speculation I have seen online that the tunnel options would not be future-proofed for potential electrification in the future. If this is true, this is heavily disappointing. Electric trains have immense benefits over other power sources for trains, including battery-electric, hydrogen, and diesel trains. Electric trains are a fast, reliable, and proven technology used across the world. Caltrain, in San Francisco, recently electrified their passenger rail service between San Jose and San Francisco. As a result, ridership skyrocketed due to more frequent rail service and reduced travel times.

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			The LOSSAN Corridor needs to be prepared for the eventual time when the corridor will need to be electrified. Building a tunnel that is not prepared for this will likely have major consequences, such as requiring the reconstruction of the tunnel to make room for overhead wires, or using less reliable forms of trains, such as battery-electric and hydrogen trains. Future proofing for electrification should be reconsidered for the tunnel options. Even if this means that construction costs will be slightly higher due to having to construct a larger tunnel, this will lead to millions of dollars being saved in the long term when there are eventually plans to electrify the corridor. Not preparing the tunnel for this would be a major missed opportunity. The LOSSAN Corridor has endless potential to be a world-class passenger rail corridor that serves millions of riders every year. Delivering a project as important as this is one step closer to achieving this goal. However, it needs to be done right to truly make the corridor as good as it can be. Ensuring that this project provides faster and more reliable service is key to this project's success, and I believe that the Camino Del Mar alignment best fulfills these goals while also minimizing residential impacts, as well as construction and maintenance costs. I hope these comments are helpful when deciding which alignment should be chosen. I look forward to seeing how this project unfolds and when it eventually gets constructed to bring the LOSSAN Corridor into the future of American rail.
9191	Jun 30, 2025, 05:07 PM	Jaegyeong Shin	Dear SANDAG Team, As a resident of North County San Diego, I want to voice my strong support for the LOSSAN realignment project. This corridor is already densely populated and will only become more so as our region continues to grow. With San Diego's increasing appeal, we must invest in a fast, reliable rail connection between Oceanside and San Diego. This rail line has the potential to serve as the backbone of our coastal communities, improving regional mobility for decades to come. I am deeply concerned that a small group of highly privileged individuals may try to obstruct or delay this essential project for their own self-interest. Their influence should not outweigh the needs of the broader public. This project is too important to be stalled. If funding is available, the Crest Canyon or Camino Del Mar tunnel options represent the best long-term solutions. They offer greater reliability, long-term resilience, and stronger alignment with community needs. The I-5 tunnel alignment lacks many of those benefits and should not be prioritized.

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			If a tunnel proves infeasible, a double-track reinforced bluff alignment would still be preferable to doing nothing. However, the “No Build” alternative must be rejected. Delaying action will only increase future costs and postpone the benefits this project can bring to residents across San Diego, Orange County, and Los Angeles. Please prioritize the needs of the entire region. We cannot let the opposition of a few prevent progress for the many. Thank you for your ongoing efforts on this important work. Your commitment is appreciated.
9190	Jun 30, 2025, 05:02 PM	Kade Wagner	Hello, I am a resident of North County San Diego and I very strongly want to emphasize the importance of this project. The LOSSAN corridor is very dense, and will continue to get denser. With the highly attractive nature of San Diego, we shouldn't expect this area to ever slow down in its growth pattern. As such, the importance of a fast, reliable rail link between Oceanside and San Diego becomes vitally important. This train has the ability to be the lifeblood of these coastal communities. I am very afraid that the interests of a small group of highly privileged individuals will do everything in their power to stop or slow down this project for their own selfish reasons. I cannot stress this enough, this project MUST continue and it MUST be good! If we do this project correctly, this transit project will be used for many future generations. However, in this day and age, you have to be a realist in terms of what you can get accomplished. If the funds are available, the Crest Canyon or Camino Del Mar tunnels are by far the best options. I think the I-5 alignment should not even be considered, it has all the negatives of the other two tunnels, but misses out on a lot of positives, the biggest one being that it is what the people of Del Mar would want. If push comes to shove, a double track reinforced bluff alignment would be better than no build. No build should be avoided at all costs, this will only cause the project to get more expensive and delay the benefits for many many years. Please do what is right by the whole county and the people of OC and LA that also rely on this corridor; bending backwards for a small group of privileged individuals to the detriment of the wider community as a whole can not happen. Thank you! The work you guys are doing is not easy and I applaud you for continuing to move forward despite the pushback from some very influential individuals.
9189	Jun 30, 2025, 04:51 PM	Colin Connaughton	I am a resident of Ventura County and love the accessibility that the LOSSAN corridor provides me to my friends in San Diego and vacation opportunities. As such an improved LOSSAN corridor with a double tracked tunnel through crest canyon to avoid the eroding del mar bluffs along with provisions for future electrification, is extremely important to me and many I know. The crest canyon alignment would move the tracks far inland while having minimal impacts on some of California’s prized and all so important wetlands. At the same time, this alignment would be slightly cheaper than the I-5 alignment while

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			taking a more direct path, presumably leading to some time savings for coaster and pacific surfliner riders. Furthermore, this far inland of an alignment would keep this segment of the LOSSAN corridor protected against the onslaught of climate change caused sea level rise and climate change strengthened storms for many more years. Please choose the crest canyon alignment for this project.
9188	Jun 30, 2025, 04:49 PM	Ezra Sacks	Dear SANDAG Board Members, I am writing as a San Diego County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Ezra Sacks [redacted]
9187	Jun 30, 2025, 04:46 PM	Mina Sardashti	Private property values should not be prioritized over the availability of safe, long term solutions to public transportation. Move the train off the shoreline! Protect the beach, another public treasure. Keeping the train on the shoreline is a shortsighted and shameful decision. Do the right thing!

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9186	Jun 30, 2025, 04:40 PM	Nathan Adair	I would have loved to take the Surfliner from LA to SD to visit relatives over the past two years, but the lack of reliability has either taken away the option or made me nervous that my trip back will be cancelled. I absolutely support this project making the route more reliable and maybe even faster!
9185	Jun 30, 2025, 04:32 PM	Nicky Kratzer	This rail line needs to be moved in order to protect the beautiful coast of San Diego!
9184	Jun 30, 2025, 03:53 PM	Debra Weaver	There are significant issues with the pink and green line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and the local residents. Continuing to analyze the pink and green lines routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the pink line and the green line routes from further consideration. Thank-you.
9183	Jun 30, 2025, 03:46 PM	Michael S Armstrong	As someone who is a long time rail transit supporter but also with a mind of fiscal responsibility, I strongly urge SANDAG to choose the Del Mar Bluffs Double Track "non tunnel" alternative alignment. There are multiple reasons for this. First, the cost of building even the least expensive tunnel option has swelled to the 3-4 billion dollar range per the most recent reports. If a tunnel is built to accommodate potential future electrification, this cost will only increase. Additionally, time savings for a new tunnel would also be minimum to nonexistent for two out of the three potential alignments. Third, shoring up the seaside bluffs in Del Mar as part of the track improvement project would also help secure the city of Del Mar itself and decrease the likelihood that both public and private property in the city would be lost due to further erosion of the bluffs. Impact to wildlife and other native species of plans would also be lessened with the non tunnel alignment, as less work would need to be performed in the very ecologically sensitive Los Peñasquitos Lagoon. Finally, the rail line in San Diego County is well known as one of the most scenic in the entire country. By burying the rail line in a tunnel and removing close to two miles of some of the best scenic seaside views on the entire line, there is potential for decrease in leisure travel riders on Amtrak Pacific Surfliner and Coaster trains. Once again, I strongly recommend SANDAG pursue the Del Mar Bluffs Double Track "non tunnel" alternative alignment for this project. Thank you for your consideration.
9182	Jun 30, 2025, 03:45 PM	Jennifer Anderson	Dear SANDAG Lossan Project Team, Below are my comments on the May 16th Updated NOP and proposed alternative routes and related environmental concerns I am requesting be addressed in the Draft EIR. Thank you for your work on this project and your consideration of the input.

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			The NOP states that SANDAG has decided to "forgo preparing an Initial Study (CEQA Guidelines 15063A) and move directly into the preparation of a Draft EIR". The NOP does not explain why SANDAG has decided to forgo the Initial Study and what the tradeoffs of doing so may include. Please explain. What is the projected ROI and outcomes of this project investment in terms of greenhouse gas emissions, ridership, economic, etc? This should be comprehended in the EIR. The NOP states that "the 2021 Regional Plan combines the Regional Transportation Plan and Sustainable Communities Strategy to achieve the regional greenhouse gas emissions reduction targets set by the California Air Resources Board." The NOP does not include projections of greenhouse gas emissions reductions we are targeting to achieve with this Project or comparatively for each proposed route. Please include these projections so we understand the environmental return on this large investment. Is this the most efficient way to achieve our GHG goals? The NOP Project Objectives omit Public Health and Safety and this should be specifically called out as a top priority. Public Health impacts and risks are not considered at all, and safety is included only in reference to safety with respect to rail crossings, not with respect to the wholistic safety risks associated with building and operating train routes and portals in and around existing neighborhoods, homes and businesses. This includes the health and safety risks of emissions, pollution, soil contamination, electric, vibration, derailment, etc. to the people living and working near routes and portals. In the list of "Potential Environmental Effects", please ensure you address: Rain, Winds & Flooding: These have become more severe in recent years resulting in flooding, instability, mudslides, atmospheric rivers. Our area and hillsides experience stormwater runoff and management issues that will need to be comprehended and will likely be complicated to address with a train running under the town, homes and businesses of Del Mar hillside. Historical and Economic: (This comment applies to both the project objectives and potential environmental effects) In addition to "minimizing disruptions to economic generators, such as the Del Mar Fairgrounds", please be sure to identify and minimize the economic disruptions to small business and homeowners throughout the building and

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			operating of a train and portals under, near and adjacent to homes and small businesses. California homeowners and residents are already facing an insurance crisis, we need to understand how adding a train under and near homes would further exacerbate the insurance risks including the ability to get insurance coverage, ability to get insurance fully covering property value, and risk of exorbitant insurance rates that property owners may experience for those who are under, near and adjacent to the building and operating of the train and portals). Other impacts may include eminent domain, property values, ability to sell homes. Please identify and minimize financial impacts to homeowners, residents and small businesses. Landslide & Foundation: Please identify and minimize the potential risks of loss or damage to the foundation of the homes that would be near, above and adjacent to the train routes and portals, both during construction and long term operation of the train amid heavy rains, winds, mudslides and ongoing escalating effects of climate change. The geological foundation of the Del Mar hillside through which the "Crest Canyon" route would run, may not be much different that cliffs upon which the train now resides. If so, the Crest Canyon route would only be shifting the bluff erosion problem from one location to another. Heavy rains and landslides may create just as big of a problem for the train running underneath the hillside town of Del Mar. Bifurcation of Community: Please identify and minimize the potential economic and social effects of bifurcating the Del Mar such that the Del Mar downtown, hill and old town neighborhood are separated by the train portal and structures from the other half of Del Mar containing the Fairgrounds and other homes and businesses. Synergies with San Clemente & Other Transportation Projects: The NOP does not (and should) include reference to any alternatives explored in consideration of the overall rail problem in California (the fact that a much larger problem needs to be solved in San Clemente) and whether there were any potential joint solutions explored that may have synergies and cost savings, eg. relocating the tracks to I5 further North with a light rail, tram or other solution to bring people to coastal cities. The NOP does not specify or quantify potential risks, impacts or closure of the Fairgrounds or other businesses in Solana Beach, Del Mar and San Diego, yet the media and public officials are making and perpetuating claims, eg. that the fairgrounds would be forced to close for 10 years or longer. If true, how does the potential impact, risks and closure differ from what would already be required in building the events platform and as compared

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			with each of the proposed routes? Is there not a way to stage work so as to avoid a 10 year closure of the fairgrounds or any other businesses? How do we prevent misinformation from our public leaders and media throughout this process? The NOP does not specify what it is about I5 alignment that would prevent building affordable housing on the fairgrounds, yet public officials and the media are making and perpetuating these claims. If true, how does this differ from what would already be required in building the event platform and with Routes B and C? If not true or unknown at this time, how do we prevent misinformation like this from our public leaders and media throughout this process? The NOP does not (and should) specify the minimum depth a train will be under houses or other structures. The initial NOP does not (and should) include in its list of “infrastructure components” the “construction of a park or greenspace for community use or other acceptable solution as to how the land where rail infrastructure was removed or modified will be reconstructed”. This project should not detract from the community environment, we can leave it off better than it was before. We need to fully understand, quantify and minimize the additional health, safety, and financial risks (including eminent domain) we may be requiring a small community of homeowners, residents and small businesses to bear to enable the train to be moved off the bluffs, the Fairgrounds to build a new event platform, and whatever the ROI and measurable outcomes around increased ridership and reduced greenhouse gas emissions this project is targeting (once that has been identified). Thank you for your consideration. Sincerely, Jennifer Anderson Del Mar Resident
9181	Jun 30, 2025, 03:38 PM	Jami Voge	There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes

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			from further consideration. Thank you. Jami Voge
9180	Jun 30, 2025, 03:37 PM	Andrea Symons	There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you. Andrea Symons
9179	Jun 30, 2025, 03:36 PM	Henry Higbie	There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you. Henry Higbie
9178	Jun 30, 2025, 03:35 PM	georgia changaris	There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Lineroutes is a clear misuse of taxpayer funds. Therefore, we strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you. Georgia Changaris [redacted] Del Mar
9177	Jun 30, 2025, 03:25 PM	Eric Basaran	The route must have sufficient clearance for overhead wire electrification.
9176	Jun 30, 2025, 03:19 PM	Patrick King	Dear SANDAG Board Members, As a SoCal resident who will soon be living near the LOSSAN Corridor, I am writing to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			Project. After reviewing the different alignments, I believe this alternative offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: 1) Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. 2) Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. 3) Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Patrick King
9175	Jun 30, 2025, 03:14 PM	Nathan Stutzman	As a UCSD PhD student with family and friends in LA, my relation to this project is primarily as a rider. My top concern is reliability. Having the tracks be shutdown unexpectedly, repeatedly and for extended periods due to the unstable cliffs has been a major pain in the past, sometimes leaving me stranded in LA. So while just reinforcing the existing line would be retain the beautiful beach views that I love to look at while working on the train, if this option means the tracks are likely to continue to be shutdown for cliff activity in the future, this would not be my preferred option. Of the other 3 options, I would prefer the under Camino del Mar alignment since it is the shortest tunnel and would retain the great views by the Penasquitos Lagoon. For the love of God though please make the train go by UCSD and have a stop there. Ridiculous that the train passes nearby a major university population but doesn't stop.

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			Having to backtrack to Old Town/Downtown via the Blue Line just to take the train is ridiculous and makes it not worth taking the train. Students would add a ton of ridership to go back home to LA or elsewhere. I suspect one of the problems with stopping at UCSD is the incline limit, which may mean that the train needs to ride along the 5 freeway sooner.
9174	Jun 30, 2025, 03:13 PM	Ian Hayden	We've been homeowners in this community for many years. Our family believes that there are significant issues with the Pink and Green Lines. These routes are environmentally damaging. We also don't believe they have community support. Continuing to consider these routes is a misuse of tax payer funds. On the other hand, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents and should be further looked into.
9173	Jun 30, 2025, 03:06 PM	Alex Pawlowski	We need to build a tunnel, leave room for catenary, and use the Crest Canyon alignment for future higher speed rain along the LOSSAN corridor. Every industry is under pressure to reduce emissions to support 2045 goals, rail should be no different. Additionally, double tracking will help reduce truck traffic on the 5 by increasing freight capacity on the corridor.
9172	Jun 30, 2025, 03:06 PM	Marina Hayden	As long time property owners in Del Mar, our family believes that there are significant issues with the Pink and Green Lines. These routes are environmentally damaging. We also don't believe they have community support. Continuing to consider these routes is a misuse of tax payer funds. On the other hand, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents and should be further looked into. Thank, you.
9171	Jun 30, 2025, 02:32 PM	Sam Shapiro-Kline	Talking Points: Leave room for catenary! Tunnel clearances and design should be future-proofed for electrification This tunnel will cost billions. Surfliner and Coaster long-term plans envision 4 TPH through this section – which economically support catenary. Does precluding catenary from the DEIR indicate NCTD and Surfliner are abandoning this level of frequency? Ask whether by precluding catenary from DEIR scope the agency is segmenting other decisions about motive power sources selection of hydrogen, which require significant fueling and safety infrastructure. Do they have a plan to mitigate the fire hazards created by hydrogen in tunnels? State unequivocally that catenary is not in conflict with the Coastal Act, contrary to the position of Coastal Commission staff. OPPOSE No build and Reinforce ROW options. We need these tunnels! Support high speed, double tracked options: a) Crest Canyon (4), b) Camino Del Mar (3)

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			Support 110 mph design speed for Crest Canyon alignment Crest Canyon alignment has the least impact on sensitive habitat. Reinforce existing ROW and Camino Del Mar options impact the Los Penaquitos Lagoon, while the I-5 alignment may impact the San Dieguito Lagoon.
9170	Jun 30, 2025, 02:09 PM	Peter Stanton	There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, I strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.
9169	Jun 30, 2025, 02:02 PM	Bethany Case	The new Del Mar Double Track Reinforced Alternative would mean that the bluffs and beaches that over a million people, including myself, visit each year would be significantly undermined. There is no way this can be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would create irreversible impacts that can't be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is against the law in California because it disregards Coastal Act Section 30253(b). This requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which have been proven to be environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider of which I'm a long-time member, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas. Thank you for voting against this option.
9168	Jun 30, 2025, 01:50 PM	Anne Beaumont	There are significant issues with the Pink Line and Green Line routes. These routes are environmentally damaging and lack community support. Conversely, the I-5 Knoll location for the southern portal is strongly supported by both the environmental community and

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			local residents. Continuing to analyze the Pink Line or Green Line routes is a clear misuse of taxpayer funds. Therefore, I strongly urge you to remove the Pink and Green Line routes from further consideration. Thank you.
9167	Jun 30, 2025, 01:44 PM	Tracy and Chris Healey	Tracy and Chris Healey respectfully submit the following comments regarding the San Diego LOSSAN Rail Realignment Project. We reside at [redacted] Recuerdo Drive, Del Mar, CA 92014. We have lived at the Recuerdo address for over 35 years. We are greatly concerned that the Crest Canyon option currently contemplated by SANDAG will have significant negative consequences for our residence and the entire Del Mar Heights neighborhood. If SANDAG determines that moving the train tracks from the Del Mar Bluffs is necessary, we urge SANDAG to pursue alternative options less intrusive to Del Mar residential neighborhoods, specifically, the San Dieguito Bridge to I-5 route and Northern Yellow Line variation of that route (collectively, the "San Dieguito Bridge/I-5 option"). The Crest Canyon alternative conflicts with multiple project objectives articulated by SANDAG, including minimizing residential impacts, avoiding negative effects to biological and recreational resources and demonstrating good public stewardship. See Updated Notice of Preparation of Draft Environmental Impact Report, dated May 16, 2025, at p.9. 1. Residential Impacts To date, SANDAG has not identified the specific route for the proposed tunnel complex for the Crest Canyon option. Indeed, the proposed line shown in the Staff Recommendation differs that detailed in the engineering drawings. See May 8, 2025 Post Value Analysis, Figure 5. And unlike the prior engineering drawings, the Staff Recommendation does not show which residences will be affected. These deficiencies undercut the community's ability to submit informed public comment. Nevertheless, it is clear the Crest Canyon proposal will impact multiple residences in the Del Mar Heights area. As such, the Crest Canyon option will trigger eminent domain obligations (for any homes eliminated completely) and subsurface easement compensation (at least for residences above the tunnel complex line). We have significant concerns that SANDAG is underestimating these impacts and resulting project costs. The Crest Canyon option includes an extensive underground boring, with a two-track tunnel and presumably additional space required for venting, safety and maintenance outlets. At a minimum, compensation will be required for all residents whose homes sit directly above the tunnel complex and related structures. Further, surface easement payments (or some other

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			compensation) may also be required for residences adjacent to the specific tunnel complex line, given vibration, noise and other impacts emanating from heavy rail traffic (including freight and military transport). Beyond these homes, the entire Del Mar Heights neighborhood will be negatively impacted by the project. The construction phase alone will likely add to the already heavy traffic experienced on Del Mar Heights Road. Long term, the post-construction impacts (including noise, vibration and other impacts) will undermine property values and the overall quality of the Del Mar Heights community. Given these and other significant potential impacts, the Crest Canyon (if selected by SANDAG) is certain to trigger substantial litigation challenges, dramatically increasing costs and delaying project completion. In stark contrast, the San Dieguito Bridge/I-5 option would present substantially less residential impacts. Indeed, the Northern Yellow Line would require no eminent domain or subsurface easement payments. That route largely runs adjacent to state-owned property and minimally impacts the Del Mar Fairgrounds. Thus, impacts could be addressed in compensation negotiations with two public entities with no displacement of Del Mar residences, presenting a far more streamlined project administration process. 2. Biological/Environmental Impacts Crest Canyon is an important regional open space asset that provides environmental benefits to all County residents. The extensive tunnelling required with the Crest Canyon option presents significant risks to this incredible resource. SANDAG's materials do not address the potential negative environmental impacts. That is particularly concerning, given the potential for seismic activity and wildfires in this area. While earthquakes and fires are a threat for all options, logic dictates that mitigation efforts with a deep tunnel complex would be far more challenging in comparison to an above ground alternative. 3. Public Stewardship From a stewardship perspective, there are multiple reasons why SANDAG should select an alternative route other than the Crest Canyon option. The Crest Canyon option will cause significant negative impacts on residences and sensitive environmental resources, which directly conflicts with SANDAG's stated policy objectives. For the same reasons, SANDAG will face substantial legal challenges if the Crest Canyon option is selected. In contrast, San Dieguito Bridge/I-5 option presents far less (if any) residential impacts.

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			Further, with no tunneling required, it would present a fraction of the environmental impact. It makes use of an existing major traffic corridor (I-5 freeway), thereby significantly reducing the new environmental impact footprint on the Del Mar community. Further, it avoids the substantial construction and maintenance risks associated with an extensive tunneling project. We understand some have expressed concern that the San Dieguito Bridge/I-5 option would require trains to decrease speed to accommodate a curve included in that proposed route. But some decrease in speed at that route location will be necessary anyway for trains that stop at Solana Beach. For those trains that might not stop at Solana Beach (such as freight and military transport trains), the modest speed decrease (estimated at 20-30 mph in SANDAG's materials) would not materially impact overall trip duration times. Clearly, a modest impact on trip duration (for this discrete segment of the LOSSAN line) is a reasonable trade off to avoid the substantial residential and environmental impacts associated with the Crest Canyon option. In summary, we respectfully urge SANDAG not to select the Canyon Crest alternative if the decision is made to relocate train tracks from the Del Mar Bluffs. Instead, we request that SANDAG choose the San Dieguito Bridge/I-5 option. SANDAG's consideration of our comments is greatly appreciated.
9166	Jun 30, 2025, 01:28 PM	Dolores Vera	Sea bluffs! We only get one world and disturbing the already eroding bluffs will cause more harm for future generations. The Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. Relocate the tracks.
9165	Jun 30, 2025, 01:22 PM	Paul Manansala	Greetings, I support the Crest Canyon option as it will improve Surf Line's resilience against rising sea levels Also, please provide more overhead space for future overhead catenary wires. Crest Canyon is the best option for upgrading this important rail line. Regards, Paul Kekai Manansala
9164	Jun 30, 2025, 01:10 PM	Alexander McKnight	Dear SANDAG Board Members,

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			I am writing as a San Diego County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Alex McKnight
9163	Jun 30, 2025, 01:05 PM	Nicholas Adams	Hi SANDAG,

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			I urge support for continuing to maintain and develop the critical infrastructure of the surfliner to support and extend future passenger rail in California. I strongly recommend the Camino Del Mar or Crest Canyon alignments to enable maximum speed for future higher speed rail between LA and SD. I also strongly recommend ensuring the tracks can be electrified with catenary wires for future proofing the trains and as a worldwide standard for electrification. Thank you!
9162	Jun 30, 2025, 12:56 PM	Krystian Czajkowski	Hello, I strongly oppose hard armoring and retaining wall construction along the coastal rail line in Del Mar. I encourage SANDAG to consider a tunnel to move the rail line away from the shore to preserve the natural character and function of the coastline. Furthermore, hard armoring will eventually fail over time and have to be reinforced. Thank you :)
9161	Jun 30, 2025, 12:37 PM	Jeffrey Davis	I've written in previous rounds about the central importance of the LOSSAN corridor for the economic activity and mobility of San Diego County and the whole of California. This realignment project should be considered in those terms. Given that, I find the arguments for the Crest Canyon tunnel alignment to be the strongest. It would be reliable, the fastest route, and the most environmentally sensitive. Let's put our cost saving efforts into efficient management of this project, and not into major compromises to speed or wetland protection. Thank you.
9160	Jun 30, 2025, 12:27 PM	Stephen Sefl	Since this is San Diego's only rail connection with the rest of the nation and with the continuing erosion of the bluffs, the only reasonable option is to move the tracks inland, and tunnel underneath Del Mar. The best of those options is likely to be double tracking the Crest Canyon route as it appears it will allow for the highest speeds (least number of tight curves). It would also be best to future proof the potential tunnel design by leaving room for catenary wires and electrification. As shown in the CalTrain corridor up in the San Francisco Bay Area, an electrified passenger train would greatly decrease both travel time and harmful diesel emissions while possibly increasing train frequency along the route. The Crest Canyon option also seems to skip the majority of sensitive habitat areas (San Dieguito and Los Penaquitos Lagoons), so it would be make the most sense environmentally. No matter which route is chosen (no build and reinforcing the bluffs should not be an option!) it will cost billions of dollars. The difference in cost between leaving room in a

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			tunnel for electrification and not having that space will be a relatively small drop in the bucket. It would make the most economical sense to spend a little more now instead of being limited by these decisions in the future.
9159	Jun 30, 2025, 12:27 PM	Ryan Dens	Dear SANDAG Board Members, I am writing as a San Diego County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Ryan Dens
9158	Jun 30, 2025, 12:14 PM	Connor Tang	I am writing to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. I believe this alignment offers the most sensible path forward for the future of rail in the region, due to its long-term reliability, travel time, and environmental stewardship. I also would like to emphasize the need to ensure that the tunnel is designed such that future electrification is possible.

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9157	Jun 30, 2025, 12:14 PM	William Winn	Please proceed with the Canyon Crest alignment and make the tunnel tall enough to electrify this line. Thank you.
9156	Jun 30, 2025, 11:55 AM	Matthews Cribioli	Dear SANDAG Board Members, I am writing as a San Diego County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards,

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			Matthews Cribioli [redacted] Aliso Viejo CA [redacted]
9155	Jun 30, 2025, 11:51 AM	Chelsea Sullivan	Please move the train elsewhere! We want to keep our beautiful bluffs.
9154	Jun 30, 2025, 11:30 AM	Vincent kolbe	I am a resident her in the area. I will sue and create injunctions in any and all capacity so you cannot complete this project. You will not ruin or destroy my property value. This is a terrible idea. And I like the 277 homes and its owners are against this project
9153	Jun 30, 2025, 11:22 AM	Samuel Sharp	LOSSAN riders deserve no less than a fast, frequent, and reliable mainline rail corridor. As a frequent user of both COASTER service and the nearby Route 101 bus, I strongly support the cost-effective and faster Under Crest Canyon alternative with clearances for future electrification.
9152	Jun 30, 2025, 10:55 AM	Emma Rodriguez	Thank you for this opportunity to comment on the essential LOSSAN Rail Realignment project. As a resident of San Diego who enjoys car-free travel north and as a member of SanDiego350 climate action group, I strongly support the proposed route tunneling under Camino Del Mar. The urgent need to reduce greenhouse gas emissions makes it critical to complete this project as soon as possible. The Camino Del Mar route is most likely to be done quickly because it is least expensive and requires the least disruption and property acquisition through eminent domain. It is also safe for the environment and for train riders in the long term. Best of all worlds! Thank you for your hard work on this.
9151	Jun 30, 2025, 10:35 AM	Susan Duerksen	Thank you for this opportunity to comment on the essential LOSSAN Rail Realignment project. As a resident of San Diego who enjoys car-free travel north and as a member of SanDiego350 climate action group, I strongly support the proposed route tunneling under Camino Del Mar. The urgent need to reduce greenhouse gas emissions makes it critical to complete this project as soon as possible. The Camino Del Mar route is most likely to be done quickly because it is least expensive and requires the least disruption and property acquisition through eminent domain. It is also safe for the environment and for train riders in the long term, especially following the deeper tunnel proposal submitted by Phil Birkhahn.

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			Thank you for your hard work on this.
9150	Jun 30, 2025, 09:16 AM	Tina Murphy	Save our coast rather than destroy it!
9149	Jun 30, 2025, 08:56 AM	Tyler Clark	Are you planning for the catenary electrocution tunnel?
9148	Jun 30, 2025, 07:59 AM	Phil Birkhahn	DEL MAR TUNNELS ARE ALREADY WIDE ENOUGH FOR ELECTRIFICATION by Phil Birkhahn, SD350 Lead on LOSSAN, June 30, 2025 Electrification is not a problem for the planned Del Mar Tunnels. Diameter increase is not needed. Unfortunately, KPBS reported on June 24th that bigger tunnels were needed. I hope they revisit the subject. In a tunnel, electric conductor wires supported by catenary wires would need extra room. But they are not the way to go. For some reason the electrification conversation has been infested with the myth that catenary wires must be used in tunnels. Instead, electrical conductor “rail” is installed at the top of the curved tunnel ceiling. It is the same sort of conductor rail used for electrification by third rail. With rail cars being 10 feet wide, there is usually plenty of room under the arch. The moving pantograph (adjustable connection from electric cable to locomotive) on top of the locomotive transitions smoothly from conductor wires to rail and back again. In the case of the Del Mar tunnels, there will be an additional four feet beyond that needed for the conductor rail on the ceiling. The planned tunnels are already more than tall enough because their diameter is enough to fit 20-foot-high freight cars. The freight locomotive is just 16 feet high. There might have been a problem if SANDAG and NCTD had failed to account for BNSF freight trains. "Catenary" derives from the pole and support cables, which sag between supports. The electric cable is suspended. You adjust the length of the attachment to the support cable, so the electric cable is nearly level. That way the pantograph does not have to go up and down very much. The Golden Gate Bridge works the same way but for cars. Germany runs trains that charge a battery and run the train at the same time when catenary is available. Sensitive stretches with no catenary can run up to 50 miles on the battery alone. Stay tuned. Battery range and charging speed are rising rapidly. In 10 years, charging in the tunnels through conductor rail could energize most of LOSSAN in San Diego County! Phil Birkhahn is a Registered Civil Engineer, and a Member of the American Society of Civil

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			Engineers including its Transportation & Development Institute. He is retired and lives in Rancho Bernardo.
9147	Jun 30, 2025, 07:29 AM	Matthew Murphy	I support the Crest Canyon alignment, for higher speeds and reduced impact on environmentally sensitive areas. I am a Los Angeles resident and a frequent rider of Southern California regional rail. Whichever option is chosen, the design should accommodate for future electrification projects. It is imperative that this project is built- the potential for increased ridership with improved service and frequency is massive and central to any climate related transportation goals for the region.
9145	Jun 29, 2025, 11:57 PM	Susan Swan	We must move the tracks away from the beach, to preserve the tracks and preserve the beach.
9144	Jun 29, 2025, 11:13 PM	Leanne Friedrich	Hi, I'm a resident of UTC, 92122, and I'd prefer the blue route (under crest) with catenary electrification so that we can have electric trains sometime in the future. I do not have a car, so I rely entirely on bicycling and public transit to get around. A reliable, frequent train line through Del Mar would allow me to visit shops in Del Mar and potentially live farther north in the future. Because the coaster is currently so infrequent, I had to rule out everything North of Del Mar because I cannot get to work on the train despite working steps from the Sorrento Valley station. A quick turnaround on this project and expanded service would be very helpful to me as a transit rider. Thanks, Leanne
9143	Jun 29, 2025, 09:49 PM	Chris Roberts	Hello, my name is Chris Roberts, I'm the Transportation Team Lead for SanDiego350, a Climate Justice and Action organization. Our mission is to advocate for public policy that will lower greenhouse gas emissions and thus lessen the worst effects of climate change for future generations, particularly in underserved communities. Thank you for your hard work in selecting the 4 routes, and for how transparent the process has been. The LOSSAN railway is critical for our transportation system, and keeping this service going using a new alignment through North San Diego/Del Mar/Solana Beach is critical for achieving our greenhouse gas emision targets. Relocating the railway off of the Del Mar Bluffs is absolutely essential, because the bluffs are unstable (due to sea level rise which has been exacerbated by global warming). Thus, the option to leave the tracks on the bluffs is unacceptable. Regarding the other three options, at SD350, our major concerns are to complete the project: 1) as soon as possible, 2) in a cost-effective way, 3) being environmentally safe, and 4) minimally disruptive (ie, minimizing the need to acquire property through eminent domain). We favor the route that tunnels under Camino Del

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			Mar, because it is projected to be the least expensive of the 3 remaining options, and could be done in a phased manner, which would simplify funding and minimize LOSSAN service disruption. SD350 volunteer Phil Birkhahn, a retired civil engineer with extensive experience in transportation projects including tunneling, has submitted a proposal to the LOSSAN team to move the tunnel under current NCTD right-of-way, and tunneling a bit deeper. His work has shown that this is a viable option, as it is the top of the bluffs that are unstable, not lower down, and moving the tunnel to the West, and deeper, would minimize potential effects on the residents of Del Mar. Phil submitted his work to the LOSSAN team, and also shared it with SANDAG BoD Chair Heebner, who apparently was quite interested. We hope that going forward, Phil's proposal is thoroughly evaluated. SD350 has confidence that the LOSSAN team will do high quality work that will result in selection of the best option. Thanks to SANDAG for all of your work on this project.
9142	Jun 29, 2025, 09:27 PM	Brandon Baik	Please choose the Crest Canyon tunnel option. It provides the fastest travel times for Amtrak, while also leaving the possiblity for LOSSAN to be electrified in the long term future. LOSSAN is the potential basis for an upgraded HSR line in SOCAL, and Crest Canyon will best facilitate that. Furthermore, electrification is the most cost-effective option for zero-emission transportation, with hydrogen and batteries having too many teething and reliability issues to scale up. Please do not bet the future on unproven and experimental tech. Camino Del Mar is a decent second option (having the electrification possibility) but is slower then Crest Canyon. The i5 option is even slower, so please do not consider this option. Reinforcing the existing ROW is a waste of time and energy - climate change and sea level rise is going to destroy the tracks no matter how hard we fight, and even if we somehow protect the existing ROW, it will require incredibly expensive maintenance. The Crest Canyon and Camino options are far more resilient and will require far less maintenance. Meanwhile, the no-build option is a massive loss for everyone involved - such a tunnel will have no effect on the locals other than to remind them that people exist who do not like to drive. Furthermore, LOSSAN is too important of a freight and passenger corridor to just destroy on the whims of a few people who don't like trains. Please dismiss no-build with prejudice.
9141	Jun 29, 2025, 08:56 PM	Bekah Higashimura	This project is a once-in-a-generation investment that will cost billions of public dollars. It is essential that we future-proof the design for the long-term needs of California’s

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			transportation system. That includes ensuring tunnel clearances allow for overhead catenary systems. Long-term plans for both the Surfliner and COASTER envision up to four trains per hour (TPH) through this corridor—frequencies that are economically viable for electrification. The DEIR's failure to accommodate catenary raises serious concerns: Does this signal an abandonment of high-frequency rail service? This decision should not be made implicitly by excluding electrification options from the scope of this project. I also ask the lead agency to clarify whether segmenting motive power decisions from this environmental review—such as defaulting to hydrogen trains—is an intentional step. Hydrogen propulsion entails significant fire safety and fueling infrastructure risks, particularly in tunnels. What is the plan to mitigate those hazards, and how do those risks compare to standard electric systems? It is also important to state clearly that overhead catenary is not in conflict with the California Coastal Act, despite recent interpretations by Coastal Commission staff. Catenary is a standard, safe, and sustainable electrification method used worldwide, including in coastal zones. Additionally, I oppose the "No Build" and "Reinforce ROW" options. These are not realistic or forward-looking alternatives. We need these tunnels to ensure safe, frequent, and climate-resilient rail service. I strongly support the double-tracked, high-speed alignments, especially: • Option 4: Crest Canyon – which allows for a design speed of 110 mph and has the least impact on sensitive habitat, and • Option 3: Camino Del Mar, which presents a feasible alignment compared to impacts from the I-5 and ROW alternatives. Of all alignments, the Crest Canyon alternative offers the best balance between environmental protection and long-term transportation needs. In contrast, the existing ROW and Camino Del Mar alignments threaten the Los Peñasquitos Lagoon, and the I-5 alignment may affect the San Dieguito Lagoon. Thank you for your attention to these comments. Let's make this project a model for sustainability, safety, and long-term vision

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9140	Jun 29, 2025, 08:45 PM	David Mullarkey	I am a resident of Del Mar and appreciate the extensive work being done to evaluate options for the realignment of the rail corridor. I fully support the need to protect our eroding bluffs and ensure the long-term safety and reliability of this critical transportation link. However, I STRONGLY OPPOSE THE "UNDER THE CREST CANYON" OPTION, as it would run directly beneath my home and neighborhood, raising significant concerns about noise, vibration, long-term property impacts, and disruption to our community's peace and stability — both during construction and for decades to come. I respectfully urge SANDAG to remove this option from consideration and instead prioritize alignments that minimize direct impact on established residential areas. Specifically, I support the following, in order of preference: 1️⃣ First Choice: The San Diego Bridge to I-5 alignment, which follows existing major transportation corridors and reduces impact on homes and sensitive canyon areas. 2️⃣ Second Choice: The Del Mar Bluffs double track with reinforced alignment, which addresses bluff stability while largely preserving the current corridor footprint. 3️⃣ Third Choice: The Under Camino Del Mar alignment, which I see as less impactful than the Crest Canyon tunnel option if a tunnel must be considered. I truly appreciate your commitment to balancing rail safety, environmental protection, and the well-being of our community. Please give full weight to the concerns of residents whose homes and neighborhoods would be directly affected by these choices. Thank you for your time, your careful consideration, and your service to our region. Sincerely, David Mullarkey [redacted] Del Mar CA 92014 [redacted]

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9139	Jun 29, 2025, 08:42 PM	Andrew Koupal	Under Canyon Crest Alternative Alignment needs to be the one selected by SANDAG for this project. This is the only solution which moves the tracks off the crumbling coast, ensures a straight enough alignment for higher speed electric service, and minimizes the impact to the environment. Other alternative alignments have a great impact on both the environment and the ability for SANDAG to efficiently service its customers. The Under Canyon Crest Alternative Alignment needs to be tunneled and needs to be large enough for catenary wires to be strung through the tunnel so the entire LOSSAN corridor can be electrified. Hydrogen trains are not a real alternative to real electrified service; We need to use proven technologies on such a critical rail corridor rather than hope on some future system to work and that it someday becomes environmentally friendly which hydrogen is certain is not currently. You cannot afford to abandon this rail line let alone be hamstrung by restrictive alternatives. Implement Under Canyon Crest with fully catenary wire electrification for the sake of LOSSAN.
9138	Jun 29, 2025, 08:06 PM	Annie Elliott	To whom it may concern , I am in opposition of pouring money into an inevitable , lose- lose situation. As you know, the beaches are what MAKES San Diego special, not a train. The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. Please do the hard thing , which is to preserve Mother Nature. Sincerely, Annie Elliott Mother and science teacher 🙄
9137	Jun 29, 2025, 07:52 PM	John Brock	As a rider of Metrolink and Amtrak's Pacific Surfliner between Orange County and San Diego, I urge SANDAG to build a fully double-tracked tunnel with a 110 mph design speed. Crest Canyon (Alternative 4) already meets that standard and is my preferred choice. Camino Del Mar (Alternative 3) is an acceptable fallback only if its geometry is upgraded to

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			the same 110 mph spec. The No Build and bluff-repair options keep trains on an eroding cliff and should be removed from further study. Because this tunnel will serve the nation's second-busiest intercity rail line for decades, it must be sized now for overhead catenary. The DEIR should compare diesel, battery, hydrogen, and electric traction on tunnel safety, life-cycle cost, greenhouse-gas emissions, and Coastal Act consistency rather than postponing that analysis. Please carry forward Crest Canyon (Alt 4) and--only if upgraded to 110 mph--Camino Del Mar (Alt 3), both with 25 kV clearance; drop the No Build and bluff-repair options; commit to a 110 mph design speed throughout; and evaluate full electrification as an integral part of the project. These steps will deliver a resilient, low-carbon, future-ready LOSSAN corridor.
9135	Jun 29, 2025, 05:04 PM	Lori Jerman	I am concerned that you are not putting in a long term, upgraded solution. I strongly encourage SANDAG to plan for catenary electrification. I've had the opportunity to ride electric trains in Europe. If we want to get there, we need the Del Mar tunnel to accommodate overhead electrification. Catenary is the gold standard used around the world and there is no suitable alternative.
9134	Jun 29, 2025, 04:47 PM	Cody Vaughn	The Surfliner corridor is the second busiest rail line in the United States, and its continued operation is essential for both regional mobility and climate goals. Erosion on the Del Mar Bluffs has repeatedly endangered service, making it necessary to relocate the tracks inland through new tunnels. However, it is imperative that this multibillion-dollar investment unlocks the full potential of the corridor rather than preserving outdated service levels. Key points: •Future-Proof for Electrification: The tunnel design must include clearances sufficient for overhead catenary. Long-term plans by both NCTD and Surfliner call for up to 4 trains per hour through this corridor—a frequency level that economically justifies electrification. Designing tunnels that preclude catenary would undermine the investment and strand the corridor with obsolete propulsion options. •Reject Hydrogen in Tunnels: Considering hydrogen as a motive power source raises significant safety concerns, especially inside tunnels. Hydrogen requires specialized fueling infrastructure, creates fire hazards, and would burden communities with unnecessary risks. The DEIR should fully evaluate these hazards. Segmenting motive power decisions by excluding catenary from the DEIR would compromise transparent, integrated planning. •Coastal Act Compatibility: There is no inherent conflict between overhead electrification and the Coastal Act. Overhead wires are fully consistent with the Coastal Act's intent;

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			aesthetic concerns should not override climate and safety imperatives. Tunnel Alignment Support: •OPPOSE the No Build and Reinforce ROW options. These fail to address bluff instability and long-term reliability. •STRONGLY SUPPORT high-speed, double-tracked tunnel options: especially Crest Canyon Tunnel (Alternative 4) as the preferred alignment, with Camino Del Mar Tunnel (Alternative 3) also a strong option. Both provide fast travel times—cutting Oceanside to San Diego trips to under 30 minutes—and unlock the potential for modern, frequent rail service. •Crest Canyon offers the least impact on sensitive habitats, avoiding or minimizing effects on Los Peñasquitos and San Dieguito Lagoons compared to other alternatives. This project is a generational opportunity. The new tunnels should not only protect the corridor from erosion but also enable a modern, fast, and clean rail system for Southern California. SANDAG must ensure the design does not foreclose future electrification or higher service frequencies. Thank you.
9133	Jun 29, 2025, 03:14 PM	Kurt Peng	Dear SANDAG Board Members, I'm writing as a California resident to support the Under Crest Canyon alignment in the LOSSAN Rail Realignment Project. This alignment offers the most sensible path forward for the region's passenger rail transit infrastructure needs. The Under Crest Canyon tunnel stands out to me for three reasons: 1. Long-term reliability is essential for any transit system people will use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. 2. Shorter travel time helps reduce car dependency and alleviate traffic congestion. The 110mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial for creating the mode shift that reduces highway congestion. 3. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems, which have been proven to enable safe, fast, reliable, cost-effective, and environmental-friendly rail travel all over the world

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			and in America (Northeast Corridor, Caltrain, SEPTA). As a mechanical engineer, I can attest to the benefits of overhead catenary rail systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in the region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision.
9132	Jun 29, 2025, 02:50 PM	Muhammad Qazi	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
9131	Jun 29, 2025, 02:24 PM	Ezekiel Pierson	I strongly encourage SANDAG to plan for catenary electrification. I've had the opportunity to ride electric trains all across Europe. We must achieve regional transport as good or better than Europe's. The result would be transformational for the region. To do that, we need the Del Mar tunnel to accommodate overhead electrification. Catenary is the gold

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			standard used around the world and there is no suitable alternative. Finally I'd like to note that the San Dieguito option is not feasible—slowing trains down to 30 mph is simply unacceptable.
9130	Jun 29, 2025, 02:20 PM	Ray Tipton	Hello, I write today in support of the "Under Crest Canyon Alternative Alignment." This rail corridor is very important to Southern California, and this option will help not only to ensure that service can continue for generations to come, but also to improve the existing service. In addition to this alignment, I also support the tunnels being built large enough to accommodate catenary lines, providing the option for electrification in the future. Future electrification of this corridor will allow for faster, more efficient, and climate-friendly service.
9129	Jun 29, 2025, 01:41 PM	Judy Dishaw	Dear SANDAG LOSSAN Team, I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment. Judy D.

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9128	Jun 29, 2025, 01:14 PM	Zakris Pierson	I strongly encourage SANDAG to plan for catenary electrification. I've had the opportunity to ride trains in France. Getting around the region would be so much better if we had trains on par with what France and the rest of Europe has. If we want to get there, we need the Del Mar tunnel to accommodate overhead electrification. Catenary is the gold standard used around the world and there is no suitable alternative. Let's build for the future!
9127	Jun 29, 2025, 11:47 AM	Sam Borinsky	I support the Crest Canyon higher speed alignment as it delivers the fastest travel time which is imperative. It is the most cost effective for what it delivers, and it should be pursued. Additionally, it must be tall enough able to support an Overhead Contact System. Electrification is a must to meet our climate goals, and this tunnel must not become a critical bottleneck stopping it.
9126	Jun 29, 2025, 11:05 AM	Karen Ou	Dear SANDAG: I am a resident of Del Mar Heights and am writing to give my feedback on the proposed project alternative alignments (LOSSAN Rail Realignment) subsequent to the updated NOP released on 5/16/25. As a point of emphasis, SANDAG has communicated that their #2 goal in this project is to "Minimize Community Impacts" after "Relocate from Bluffs." Let's see SANDAG put their money (actually, taxpayer money) where their mouth is. Of the 4 routes that are in consideration, none of these are ideal as they all require eminent domain. The displacement of any residents and businesses will create terrible disruption, emotional and financial stress, which all affect livelihoods and community stability. There is already enough economic uncertainty as it relates to government funding (potential cuts in Medicaid, Medicare, Social Security), stubborn inflation/stagflation, and changes in the labor market with artificial intelligence (i.e. layoffs). We are already having to cope and prepare for these changes to our economic situation. Eminent domain in Del Mar would only exacerbate the adverse economic and community impact for its citizens, displacing many due to the high real estate prices and home ownership costs (i.e. home insurance and property taxes). I am writing to urge SANDAG to bring forth as a 5th option, the "more northerly design concept" of the yellow line (San Dieguito Bridge to I-5 Alternative Alignment) and fully support this option. In general, I believe that an I-5 alignment/inland corridor is most sustainable and efficient; however, the current yellow line option requires eminent domain of homes and businesses along San Dieguito Drive and Racetrack View Drive. Eminent domain often results in unfair compensation (leading to a sense of loss and

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			injustice), as property values paid won't accurately reflect the true value of a property. This can lead to disputes over compensation amounts or the legality of the eminent domain process, creating lengthy and costly legal battles, litigation and additional stress for property owners. Please consider the residents' lives, homes, businesses, economic and community impact! And while I commend SANDAG for adding the I-5 alignment option as a consideration, let's get this option right! Sincerely, Karen Ou
9125	Jun 29, 2025, 10:57 AM	Josh Kenchel	I support the Crest Canyon alignment, and urge SANDAG to make sure that it either includes catenary electrification, or is future-proofed to allow for future electrification. San Diegans cannot afford to wait one day longer for safe, future-proofed double-tracked rail along this route. We cannot allow a few wealthy interests to bully us into pursuing the bluffs alignment, which will surely put us back in the same conundrum in a few decades.
9124	Jun 29, 2025, 10:52 AM	Alex Veith	I strongly recommend the Camino Del Mar tunnel proposal. It is silly to waste millions if not billions of dollars to align the tracks via alternative routes to "protect" the property values of Del Mar residents. The double track on the bluff is foolish and will simply require absurd effort to avoid falling into the ocean. I am in favor of the blue route only if it cheaper or similar in cost to the purple route.
9123	Jun 29, 2025, 10:52 AM	Geoff Veith	I strongly recommend the Camino Del Mar tunnel proposal. It is silly to waste millions if not billions of dollars to align the tracks via alternative routes to "protect" the property values of Del Mar residents. The double track on the bluff is foolish and will simply require absurd effort to avoid falling into the ocean. I am in favor of the blue route only if it cheaper or similar in cost to the purple route.
9122	Jun 29, 2025, 10:51 AM	Samuel Veith	I strongly recommend the Camino Del Mar tunnel proposal. It is silly to waste millions if not billions of dollars to align the tracks via alternative routes to "protect" the property values of Del Mar residents. The double track on the bluff is foolish and will simply require absurd effort to avoid falling into the ocean. I am in favor of the blue route only if it cheaper or similar in cost to the purple route.
9121	Jun 29, 2025, 08:51 AM	Josh Gilbert	Have they planned for catenary electrification in the tunnel? This is mission critical.
9120	Jun 29, 2025, 07:58 AM	Brandon West	After reading about these proposals, it concerns me that a primary option is to design the new track without catenary electrification. Traveling to Europe, Tokyo, and other train-

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			efficient cities showed me how convenient modern, efficient public transportation be. Please consider designing this new track with technology that makes us competitive.
9119	Jun 29, 2025, 07:40 AM	Austin clark	Choose the under crest canyon option. If the train loses speed or is forced to go with non electric options, it will degrade service and make the track less and less viable. Ensuring all options maintain electric trains you see in other countries is a must have, without a loss in speed to navigate unnatural turns.
9118	Jun 28, 2025, 09:31 PM	Thomas Smith	To whom it may concern, As someone who has used the Pacific Surfliner for many years, and as someone who would like to use the Pacific Surfliner for many more years to come, I would like to state my support for the Crest Canyon and Camino Del Mar alternative alignments. I believe that these alignments are the best choices for the LOSSAN Rail Realignment project. The tunneled alternatives would massively improve the resiliency and reliability of the rail line, allowing the Pacific Surfliner and the COASTER to run for many more years. The Crest Canyon and Camino Del Mar alternatives are my preference, as they provide a more direct and faster route through the project area than the San Dieguito to I-5 alternative. Speed improvements are a substantial benefit for projects like this, given the rare opportunity to realign the railroad right-of-way. The faster a rail line - within reason - the more people will ride it, and isn't that the ultimate goal of Southern California's rail system, to have more people to ride it? The Pacific Surfliner currently takes about 2 hours, 50 minutes for the trip between the Los Angeles and San Diego. Improving the speed, reliability, and capacity of the LOSSAN Corridor to reduce that travel time - to below two hours, for example - would substantially improve the value of Southern California's rail system, and its transportation system overall, and would surely attract multitudes of new riders. Additionally, I have heard that this project currently plans for tunnels that would not be tall enough to fit electric catenary. Perhaps this is due to potential aesthetic concerns around electrifying the LOSSAN corridor with catenary. I think preventing the tunnels from being fitted with electric catenary would be a mistake. Catenary electrification is an incredibly valuable investment, as proven on multitudes of similar rail lines around the world, in particular the Caltrain line here in California, which saw substantial speed, ridership, and fare revenue improvements after the line was electrified with catenary. It would be wise to be forward-thinking, and design the LOSSAN Corridor to allow for catenary electrification along the entire line; that includes any tunnels created by the LOSSAN Rail Realignment project. I believe that the transportation, environmental, ridership, and business benefits of electric catenary outweigh potential aesthetic or cost concerns - the benefits are so substantial.

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			Furthermore, many places around the world show that coastal rail lines can have catenary with minimal aesthetic concern, including: the Dublin DART service to Greystones in Ireland; the Belgian Coast Tram; the ScotRail Inverclyde line in Scotland; the UK's East Coast Main Line in eastern Scotland and Northern England; multiple rail lines on the Mediterranean coastline of France, including in the French Riviera; multiple rail lines along the Catalonian coastline in Spain; the many rail lines along nearly the entire Italian coastline, including beloved scenic areas like the entire Italian Riviera, the northern and eastern coastlines of Sicily, and much of the Adriatic; and presumably more lines in other countries around the world as well. Genuinely, look up some photos of some of these rail lines, they're absolutely beautiful, and the catenary has little to no effect on that beauty. Surely, if catenary electrification works for many scenic coastlines in Ireland, Scotland, England, France, Spain, and Italy, it can work for a scenic coastline in California? Lastly, if aesthetics are such a concern that catenary would never be allowed along certain coastal sections of the LOSSAN Corridor, it could make sense to have a discontinuous catenary electrification scheme, where bi-mode catenary-electric and battery-electric locomotives would allow for a train to operate in either mode, dependent on the presence of catenary. Though, discontinuous electrification, like hydrogen-powered trains, is a new and unproven technology, so my first preference is for electric catenary, an extremely proven technology. Still, if, sometime in the future, a discontinuous electrification scheme were proposed for the LOSSAN Corridor, would it not make great sense to put electric catenary inside a future Del Mar tunnel, where it cannot impact coastal views? I don't think it would be sensible to rule out this future possibility by not designing the tunnel to fit electric catenary. In conclusion, I would again like to state that I support for the Crest Canyon and Camino Del Mar alternative alignments. I believe that they are the best choice for the LOSSAN corridor to provide a lasting, high-quality rail service, so that people will be able to ride the Pacific Surfliner and COASTER for many more years to come. Additionally, I believe that all of the alternatives should allow for future electric catenary - it is a proven technology capable of substantially improving the LOSSAN Corridor, and preventing it would be a short-sighted error that we would likely come to regret in the not-too-distant future. Thank you, Thomas Smith

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9117	Jun 28, 2025, 09:20 PM	Thomas Whitehill-Nigl	Dear SANDAG Board Members, I am writing as a San Diego County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow. This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Thomas Whitehill-Nigl

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			[redacted]
9116	Jun 28, 2025, 08:10 PM	Ryan Jerman	It should be a given that this tunnel be designed to accommodate catenary electrification. Catenary is the gold-standard for fast, sustainable rail transport around the world. Hydrogen and battery electrification are not suitable alternatives from a service-quality or sustainability perspective. Under Crest Canyon is my preferred alternative. It would be by far the fastest and least environmentally destructive. Under Camino Del Mar would have its merits if it were designed to leave open the possibility of a Del Mar station at some point in the future. However, I'm not sure that is worth the destructive impacts of extended construction on the Los Penasquitos Lagoon. The San Dieguito Bridge Alternative would significantly compromise the speed of through-running service. Considering this is likely to be the closest to a high-speed rail connection San Diego will get for 25 years after its construction, we should not accept this -- especially from the most expensive Alternative. This corridor should serve as an essential spine for rapid transit throughout the region from Tijuana to Oceanside, and beyond that to Los Angeles and Santa Barbara. It could be San Diego's version of the Elizabeth Line in London, a transformative investment that improves quality of life, access to the coast, employment opportunities and more for millions of people. We cannot afford to bear the expense of this project in such a way that would foreclose the possibility of it becoming so much more.
9115	Jun 28, 2025, 07:20 PM	Carlos Chavez	I fully support this project as the LOSSAN corridor is a crucial piece of reducing VMT and connecting North County to South County. Please future proof the tunnel to include the highest speed and support future electrification. I prefer the Crest Canyon alignment.
9114	Jun 28, 2025, 06:54 PM	Douglas Smith	Do it. Build everything and more
9113	Jun 28, 2025, 06:07 PM	Christine Hurst	Please move the tracks away from the cliffs. It is the only long term solution and that’s what makes the most sense. Why keep the tracks on the coastline which will continue to erode? Please god tell me you all are smart enough to realize this?!
9112	Jun 28, 2025, 05:36 PM	Dominic Bendinelli	The tunneling projects must be adjusted to allow for future catenary electrification. There will likely not be another tunnel project for this line for 100 years, it cannot be done in a shortsighted manner. The LOSSAN corridor is ripe for electrification, it may be another decade or two until that happens but we must be ready when conducting a major infrastructure project such as these proposed tunnels. The cost increase is marginal on a major project such as this realignment. Please ensure this project aligns with the CA 2050

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			state rail plan of frequent, fast and zero emission service across the state. Thank you for your work on this once in a generation project.
9111	Jun 28, 2025, 05:14 PM	Guthre Leonard	Hello Sandag Board Members, I am a constituent from La Mesa, and I am writing in to support the Crest Canyon Alternative. I do not own a car, so the best way for me to travel home (to Santa Barbara) is via the LOSSAN corridor. However, because of the poor frequency AND speed, this takes significant planning. Having a tunnel, especially with the Crest Canyon alignment, would allow me to get home faster on a more reliable train service. I am tired of wondering if my trip will take an extra hour because of track stability issues. This is the busiest rail corridor on this side of the Mississippi, so please give it the priority it needs. Finally, it is of utmost importance that the tunnel has room for electrification wires. As San Diego County and the state of California attempt to lower emissions and shift people away from cars, it is necessary to prioritize electrifying rail. It makes services faster, more reliable, and cheaper to run, while producing zero local emissions. This is necessary for the future of the LOSSAN corridor. Do not jeopardize it with short-term value engineering. You must allow for electrification in this tunnel for the future of the region. Thank you, Guthre Leonard
9110	Jun 28, 2025, 04:46 PM	Marcus Ramos	As this is a development orchestrated generally for the betterment of quality of life and safety for the people who use the Surfliner, surely it is known that these people are also San Diego residents. In any situation with conflicting ideals, it is most often beneficial to strike a compromise--but here there is scarcely a middle ground. I ask, as born-and-raised San Diego resident, that the aesthetic, environmental, historical, and cultural impact the Del Mar Double Track Reinforced Alternative would have on San Diego, and something much older, but ever more fleeting in the face of current circumstances: the bluffs. Before there was any large scale infrastructural development in San Diego, this part of our city had the coast, and again as a San Diegan the role the coast plays in our identity cannot be ignored. In any manner, I hope that public appreciation of the coast and overarching sentiment--not just the immediate fiscal benefits associated with the reinforcement plans--are considered. There is no greater symbol of San Diego than our beaches.
9109	Jun 28, 2025, 04:44 PM	Clive Freeman	June 28, 2025 Honorable Members of the SANDAG Board San Diego Association of Governments 401 B Street, Suite 800

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			San Diego, CA 92101 Dear Honorable Members of the Board, Thank you for your dedicated attention to the future of regional transportation. After reviewing the current report and the options under consideration, I respectfully urge the Board to select the San Dieguito Bridge to I-5 Alternative Alignment for the rail corridor. I believe this is the best option available for the following reasons: Long-Term Climate Resilience: With the growing impacts of climate change, it is essential to plan for a resilient transportation network that will last for the next 100 years. Only the I-5 option avoids the significant threats posed by sea-level rise and coastal erosion. Environmental Protection: No modern planner would choose to bisect a sensitive area such as the Los Peñasquitos Lagoon. The I-5 alignment avoids this, preserving critical habitats and protected lands. Community Preservation: The I-5 option minimizes the need for eminent domain and reduces disruption to Del Mar neighborhoods and businesses, protecting the integrity of these communities. Reduced Environmental Impact: All western alternatives require destructive new construction within protected habitats. The I-5 alignment is the least disruptive and most environmentally responsible choice. While no alignment is perfect, the I-5 Alternative clearly stands out as the most environmentally sound, climate-resilient, and least disruptive solution. I urge you to act decisively to preserve our ecosystems, protect our communities, and secure the future of Southern California's critical rail infrastructure. Thank you for your consideration. Sincerely, Clive Freeman [redacted] Del Mar, CA 92014

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
9108	Jun 28, 2025, 04:40 PM	Leif Gensert	Dear SANDAG Board Members, I am writing as a San Diego County resident to voice my support for the Under Crest Canyon tunnel option in the LOSSAN Rail Realignment Project. After reviewing the Value Analysis Study, I believe this alignment offers the most sensible path forward for our region's rail infrastructure needs. The Under Crest Canyon tunnel stands out to me for three key reasons: Long-term reliability is essential for any transit system people will actually use. By moving trains away from the unstable coastal bluffs, this tunnel eliminates the constant threat of service disruptions from erosion and landslides that have plagued this route. Travel time matters when we're trying to get people out of their cars. The 110 mph capability through the tunnel keeps rail competitive with driving between San Diego and LA, which is crucial if we want to see real mode shift and reduced highway congestion. Environmental stewardship means protecting our coastal lagoons. Unlike other proposals that would cut through these sensitive ecosystems, the Under Crest Canyon route avoids lagoon impacts entirely and could even enable habitat restoration at Los Penasquitos. **I also want to emphasize the importance of designing the tunnel infrastructure to support future electrification with overhead catenary systems. We shouldn't build infrastructure today that limits our ability to run cleaner, faster trains tomorrow.** This project represents a significant investment in our region's future, and I believe the Under Crest Canyon alignment delivers the best value for taxpayers while positioning San Diego County for sustainable growth. I encourage you to select this option as the preferred alternative moving into environmental review. Thank you for considering my input on this important decision. Best regards, Leif Gensert
9107	Jun 28, 2025, 02:58 PM	Alexandra Kinander	Please please preserve our beaches and find an alternative that’s not just reinforcing what’s not working and damaging the coast

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9106	Jun 28, 2025, 01:50 PM	Rod Stewart	I surf Del Mar and became a Surfrider member 35 years ago. But I am also an engineer and taxpayer. Move the tracks yes, but only inland as much as is needed for double tracks, and be safe from the irreversible retreat of the bluff. Sure, some private land will be lost (true of any option) . And when the need arises to move the tracks inland again, more will be lost - including eventually the homes along the bluff and much of lower Del Mar. Eminent Domain is the taking from the few for the good of the many. A few very wealthy want the rest of us to pay to get the tracks out of their ocean view. Moving the right-of-way inland as far as needed for a safe double track - is the quickest, least disruptive, and cheapest option. Face the future, find the facts but don't feed Del Mar's train-free fantasy - the train built Del Mar.
9105	Jun 28, 2025, 12:54 PM	Emma Wright	Please move forward with 'Tunnel Alternatives' and not another quick fix.
9104	Jun 28, 2025, 12:06 PM	Tyler Andre	As a local resident who cares deeply about both our environment and community impact, I strongly support the option that tunnels under Camino Del Mar. It strikes the best balance by being the least expensive of the viable alternatives (aside from keeping the tracks where they are), while also offering a phased construction approach that would reduce service disruptions and make funding more manageable. Most importantly, it avoids major property impacts and keeps environmental safety a top priority. Let's move forward with a solution that respects both people and the planet.
9102	Jun 28, 2025, 09:25 AM	Kristy Malone	Move the trains and protect our beaches!!
9101	Jun 28, 2025, 08:32 AM	Alexander Beran	Dear SANDAG Board of Directors, I appreciate your efforts towards improving the LOSSAN corridor and I would like to share my thoughts. Californians deserve high quality public transit. The LOSSAN corridor serves as a key corridor for our state's transportation network. When relocating the Del Mar Bluff tracks we need to build it in a way that functions long into the future. This is why 110 mph curves and available overhead space for catenary wires above the trains need to be essential components. Value engineering and broken promises have led to a lot of transit projects being received poorly. Let us act against that standard and uphold the 110 mph operating speeds in the tunnel set forth by the 2021 Regional Plan. The Under Crest Canyon proposal plans to use

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			110 mph operating speeds while all other proposals do not uphold that policy. When constructing public infrastructure, there are many risks of pushback from people experiencing effects on their property. The Under Crest Canyon mitigates this risk as much as possible whereas Under Camino Del Mar affects many peoples' property in the area. This is why I request that Recommendation 2 (Under Crest Canyon (Under Jimmy Durante to I-5 Knoll)) as outlined in the Post Value Analysis Study Assessment be selected to be the focus of further developments in the project. I do recognize that the Under Crest Canyon proposal has a higher cost than two of the proposals, but I believe that it is worth it. We should stick to our goals. 20 miles per hour faster is a lot faster.This proposal also reduces the risk of lengthy and costly lawsuits that could cause delays and increase cost. This is a key part in making rail competitive with road We have a unique chance to build a major piece of infrastructure that will support rail for the next century. Let's not build something that will be outdated in a couple decades. Thank you, Your Name
9100	Jun 28, 2025, 08:05 AM	Kathy Fine	Keeping the train tracks along the Del Mar bluffs is not a viable solution. The ocean is relentless. Maintaining the tracks there will cost millions in maintenance and repair, and train service will continue to be interrupted. Having the train run along the bluffs is dangerous for both train riders and beach goers. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas. The tracks must be moved away from the beach!
9097	Jun 28, 2025, 05:44 AM	Nadav Kempinski	I love the Surfliner rail line, and it's pretty to see the ocean when passing by, but aesthetic appreciation is no excuse to continue degrading the local bluffs. Especially as we consider the impacts of sea level rise, seawalls are unable to protect the bluffs without continued erosion; this will end up costing the state much more to protect our old rail line, rather

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			than start afresh. Please move the line away from the bluffs somewhere that we can afford to keep it running (and hopefully make our rail cheaper to use!). A lagoon over the Los Penasquitos lagoon, a wetland abutting the Pacific, will also need to be able to deal with sea level rise (as the wetland currently manages additional water quantity from storm surges and higher tides), and will need to be sized appropriately (both vertically above the lagoon, and horizontally as the wetland may flood nearby areas as higher volumes are experienced). I do not believe this would be an environmentally friendly solution, especially as track and train degradation, along with general usage and maintenance, pollute the wetland, and therefore our ocean and local ecosystem.
9094	Jun 27, 2025, 04:49 PM	Francis Redublado	The LOSSAN corridor is one of the busiest passenger and freight routes in the nation. It also provides a critical connection to the San Diegan military bases from the rest of the nation. It is imperative that no corners are cut when upgrading this significant corridor. This is why both nontunnel options are a complete no-go. They both keep a massive speed bottleneck that plagues all services. They also both have significant issues themselves. No build only delays an inevitable collapse and increases the chance of tragedy. Building in place will still draw the ire of Del Mar residents and the CCC. Finally, both these options will likely remain opposed by Del Mar residents, since they clearly intend to convert this part of the track into a trail. The tunneled ones are the best options because they aren't threatened by the erosion in the bluffs. Of these, the Crest Canyon Route is by far the best option. It is the speediest and least disruptive. The Camino Del Mar route is a close second, but risks closure of a key road and lowers speed by too much. By far the least viable option is the I-5 tunnel. It is ridiculous to get a chance to improve this route, and introduce a massive bottleneck anyways. It is also possibly the most expensive route, a dangerous detail when available funds are shrinking. Finally, it is important that any route chosen be able to support catenary. It may cost more to increase the size of the tunnels, but the route is too important to cut corners. Without catenary, the tunnel will be limited towards diesel or battery trains. Diesel lacks the environmental and speed improvements that electrification offers. Battery trains are still unproven, and too risky to rely on for an important corridor. Catenary would increase the versatility of the corridor. Overall, the best option is the Crest Canyon Route, followed by Camino Del Mar. Additionally, tunnels should support catenaries.
9093	Jun 27, 2025, 04:05 PM	John Caffaro	Subject: Study the Northern Yellow Line

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			As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.
9092	Jun 27, 2025, 03:50 PM	Cindy Deming	Please implement the tunnel strategy for the rail line. Leaving it in place and what that entails will be disastrous for our beaches. Please make protection of our beaches the number one priority! Thank you!
9091	Jun 27, 2025, 03:25 PM	Darcy Stamler	Thank you for the opportunity to comment on the updated NOP for the relocation of the train tracks off of the Del Mar bluffs. First, curiously, the updated NOP does not change significantly the placement of the portal areas, nor does it change the proposed routes, despite the significant amount of time spent in a value analysis study. Of the routes listed, two of them would not relocate the trains off the bluff (despite this being the main objective of the study). My comment here addresses three areas: The Purple Line Route, the Northern Yellow Line Route, and the longer view of moving the tracks along the I-5 transportation corridor. First, regarding the continuing and curious inclusion of the Purple Line Route in the study, this is clearly the worst option for a variety of reasons: Since it would tunnel under Camino Del Mar, the amount of disruption and destruction to Del Mar businesses in the construction process would be continuous and extreme. Few businesses will survive it. It will destroy the town's economic base and the small- business culture of the city. A double-track underground tunnel would be at least as wide as Camino Del Mar. The impact on residents' homes and families living on either side of Camino Del Mar and on Stratford Court would suffer: o Virtually continuous Noise and Vibration of continuous freight and passenger trains

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			traveling underground next to their homes o Long term negative health effects shown to be associated with living near trains including disrupted sleep, shorter life spans, and anxiety. o The risks of carrying Hazardous Waste near their homes o The Hazard risk of explosions, and of derailment including derailment of trains carrying hazardous waste, such as that which occurred in East Palestine, Ohio, close to and under their homes (the FRA reports more than 700 train derailments in 2023 alone). o Eminent domain taking, and if not taken, a dramatic drop in property values and the inability to sell their homes during the final selection process, construction phase and after construction with the uncertainty generated over the long-term impacts as noted above. o Potential foundation and wall stability issues due to the vibration of the freight trains fully loaded traveling under homes. Homes in this area were not built with this type of vibration in mind. o Accelerated bluff erosion as the vibrations from the tunnel through the sandstone will cause additional cracks in the earth allowing water penetration and erosion to occur. Second, regarding the Northern Yellow Line Route, this is currently the best option as it is the only current study route that circumvents homes and businesses and does not require the use of eminent domain at least affords Del Mar a path to survive the assault of realignment and is the only acceptable alternative. Mario Orso stated at the February 28, 2025, and March 14, 2025, SANDAG Board meetings, that he was “committed” to study the Northern Yellow Line route in the Environmental Impact Report even though it is shown only in the footnotes of the document, citing lack of sufficient time to develop the route as the reason that it was not a formal part of the recommended routes. We look forward to this alternative route being included as a route in the EIR study for final consideration. The Northern Yellow Line Route is the only one that utilizes the non-populated areas of this beachside community and public lands. It allows the route to be built with the lowest impact on residents and the least impact on businesses. It would allow businesses to remain open during construction and limits the impacts to private homes by routing the train along public lands where gaining the necessary right of way would be much simpler and less expensive. With consideration given to maintaining the horse racing and fair schedules and to strategically planning how to do the construction staging in such ways as to minimize impact to fairground operations, this route is far superior to any of the other routes in the NOP . The impact on residents in Del Mar and San Diego

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			would be far less and it would also limit the traffic flow disruptions for residents of all of the beach communities who use the routes through Del Mar for commuting to work or school or for access to restaurants and businesses. This route would also dramatically limit the number of lawsuits that SANDAG and NCTD will face over eminent domain and the purchasing of land access rights and would head off the foreseeable class action suits that will be brought to compensate for generations of adverse health effects if any of the other routes are selected. In short it has the following advantages: • No negative impact on ANY homes or businesses. • Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon. • Places no air-polluting portals near homes, near the coast or near the Fairgrounds. • Bores no tunnels under or near homes. • Runs entirely along the edge of state-owned property (the Fairgrounds) and minimally impacts a small portion of its 370-acres by running along the outer edge and if needed, obtaining an easement for which compensation can be paid to the Fairgrounds without displacing families. • No negative impact on the City of Solana Beach. • Eliminates the expense of tunnels under private property and added infrastructure otherwise needed for routes below sea level rise. • Assumes the planned replacement of the trestle bridge and the Fairgrounds special events platform. • Allows Riverpath Del Mar to be completed as planned, finally linking the Coast to Crest Trail and the Crest Canyon trail with a safe trail along the edge of the lagoon. • It is expected to cost considerably less than other routes that require tunneling right under homes and eminent domain of homes and businesses. • Has the greatest likelihood of avoiding litigation which would greatly increase the route costs and cause delays. Finally, many comments have been made in SANDAG meetings urging the Board to take a longer view and find a long-term solution to move the tracks not only off the Del Mar Bluffs but out of all of the densely populated coastal towns and put them along the I-5 transportation corridor. That route, however, is not an option in the current NOP. I urge SANDAG staff and Board to reconsider this option during the EIR process. Sincerely,

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			Darcy Stamler [redacted]
9090	Jun 27, 2025, 03:05 PM	Thomas Devlin	We need to relocate the rails!
9089	Jun 27, 2025, 01:45 PM	Seay Veronica J Seay	You must get the train off the bluffs in San Diego County. I agree with the Surfrider Foundation!
9088	Jun 27, 2025, 01:37 PM	Martin thomas	Don't fuck up the coast more than you already have. Thank you.
9087	Jun 27, 2025, 12:57 PM	Myla Clark	As a LOSSAN corridor rider, I want to advocate for the alignment, whichever is selected, to be built wide enough to accommodate future overhead wire electrification. If the tunnel cannot accommodate overhead wires, SANDAG will be closing off opportunities for electrification along the whole line for all agencies. SANDAG should prioritize riders and the climate over short term costs and aesthetics -- please design this project to safeguard future investment in overhead wires, so that one day we can have faster, zero emission, energy efficient electric trains in SoCal.
9085	Jun 27, 2025, 12:22 PM	Gregory Woods	Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. For the LOSSAN rail track to enter the 21st century and avoid further destruction of the bluffs and beaches that over a million people, including myself, visit each year. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
9084	Jun 27, 2025, 12:08 PM	Thomas Lochtefeld	Without offshore wave damping reefs, Seawalls cause near shore beach scour that alters natural sand migration. So, either move the trains inland, or build offshore surfing reefs to mitigate the wave action and enable acceptable near shore sand migration.
9083	Jun 27, 2025, 11:56 AM	Therese Maria Nugent	The beach is a precious resource that needs creative solutions. Please consider alternative alignments and do not keep the current Del Mar track location

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9081	Jun 27, 2025, 11:29 AM	Tanja Muetze	Hi! I absolutely love taking the train from Old Town to LA Union Station (sitting on the left on the Northbound and right on the Southbound ride to get maximum ocean views). Over the years, I have encouraged my friends, family members and acquaintances to do the same. Many ended up taking the train, enjoying the ride and even becoming regulars. I also love taking a walk on the beach below the bluffs and it's sad to see soooo many reinforcements ruining them. Let's not make the train track site another one when creating double tracks. Using a tunnel and one of the proposed routes would be preferred to avoid the aesthetics of the reinforcements, to future proof the route, to avoid costly shutdowns due to landslides that also frustrate travelers as well as to prevent the negative environmental impact to the bluffs and eco-system. Another crucial step is the electrification of the line to speed up the trains. It's heart-breaking that despite the US being so advanced, the trains run very slowly and uncompetitively compared to the car, even with traffic. Let's make sure to future proof the tunnel(s) and make them wide enough for the electrification of the San Diego - OC/LA line. It would be a game changer: Not only would more people be willing to ride the train if it was faster than the car but also can you run more trains on the same line increasing revenue. A win-win! Thanks so much for considering my opinion. Please don't double track in Del Mar but choose one of the tunnel routes and make them large enough for fast, electric trains. The yellow route would be awesome as one would get to see the Racetrack! Thank you!
9080	Jun 27, 2025, 11:28 AM	Peter Bolane	Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation
9079	Jun 27, 2025, 11:13 AM	Jet Yang	I think SANDAG should focus on moving the tracks away from the bluffs, as the bluffs are not a safe place for tracks. Rising sea levels have increase the number of landslides/collapses, so I think it'll be more costly both money and safety-wise to try and keep the tracks as-is rather than move them somewhere else. On another note, next to the sea is not the most effective location for rail tracks; next to the sea, people have to go closer to the seaside (already a high-traffic area) just to catch the train. Whereas more inland, people who need to take the rail can approach from both sides, making it more efficient at transporting people.
9078	Jun 27, 2025, 11:12 AM	Joe Willix	As a surfer who regularly uses the beaches from Del Mar to Oceanside, I oppose this plan. I believe San Diego County Surfrider Foundation summed it up succinctly for me: Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be

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			mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas. Make the extra effort and do the right thing, not the convenient thing: Move the train.
9076	Jun 27, 2025, 10:08 AM	Amber Levine	Please figure out a way to move the train. Sea walls aren't sustainable. Train should be right next to freeway.
9074	Jun 27, 2025, 09:52 AM	Sarah Mulholland	Hi, please consider moving the train off of the Torrey Pines bluff. This is one of my favorite stretches of beach to walk but every time I go, there's now heavy machinery and closed entrances and closed parking. Plus we know and history has shown that these cliffs will continue to crumble. That's their purpose to restore the beach and it's not financially responsible to keep fixing a broken ship destined to sink. You know it's going to take years to move the train, please work on it so we don't have an extreme storm that shuts down access to So Cal entirely. The yellow route along the highway is my preference because it has the least impact to Del Mar and could maybe get built this century.
9073	Jun 27, 2025, 09:46 AM	Doug Thompson	This needs to be addressed now. It's obvious the ocean will win....
9072	Jun 27, 2025, 09:43 AM	John Funnell	Please take a forward-looking view when building the new LOSSAN rail alignment. We have a chance to provide relief to freeway and road users by building the Del Mar tunnel. Also, allowing for future electrification will help our region and state move closer to achieving climate goals of the future. We were a leading in building the freeways of the 20th century, but we need a proper multi-modal transportation system that works for everyone. Let's be a leader in passenger rail transit, California has always been bold. Any skeptics should look to the resounding success of CalTrain electrification. Our LOSSAN tracks travel through the heart of many great towns and cities, let's look to replicate that same success in San Diego.
9071	Jun 27, 2025, 09:41 AM	Celeste Parry	I support moving the train away from the beach. Although it provides a beautiful view while riding, it is dangerous for beachgoers, and it will require reinforcing the bluffs which will ruin the integrity our our beaches which are already pitifully low on sand due to development efforts. Long term, the train needs to be relocated to a safer location than along degrading bluffs of sandstone.
9069	Jun 27, 2025, 09:17 AM	Emily Shuffield	Please move the railroad away from the beach in Del Mar! It will save time and money in the long term and protect nature.
9068	Jun 27, 2025, 09:12 AM	Kinley Gardiner	Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot

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			be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
9067	Jun 27, 2025, 09:09 AM	Mark Irwin	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
9066	Jun 27, 2025, 09:06 AM	Mitch Meredith	Yes, moving the railway would be optimul, "obliterating", the beaches in Del Mar is bad for the natural ecosystem. We need to protect Del Mar beaches for future generations to enjoy.
9065	Jun 27, 2025, 08:49 AM	Diane Everett Barbolla	Hello I am opposed to a plan that will permanently destroy almost two miles of beaches in Del Mar. One solution that has worked in Germany and Switzerland among others is to shuttle passengers around the eroded bluffs or cease rail services that start south of the bluffs. Thanks, Diane Barbolla
9064	Jun 27, 2025, 08:48 AM	Diane Anderson	Please move the train to a safer location. It would also save our beautiful coastline from the ugly enforcements that are needed to prevent the train from going off the cliffs.

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9063	Jun 27, 2025, 08:48 AM	Scott Glaser	Alternative alignments are environmentally durable, sensible, and likely economical long term solutions.
9062	Jun 27, 2025, 08:44 AM	Sarah Furrow	Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
9061	Jun 27, 2025, 08:42 AM	Jake McConnell	I say no to building the seawalls. Protect our beautiful beaches. Move the train to another location away from the ocean. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas. Thank you, Jake
9060	Jun 27, 2025, 08:40 AM	vicki norman	Please stop - we live in san diego for our beaches!!!
9059	Jun 27, 2025, 08:37 AM	Joseph Demarchi	Please keep the train were it is. It provides an invaluable service connecting San Diego and LA
9058	Jun 27, 2025, 06:42 AM	Teri Rutter	The beaches are important!! Please move away from the beach!
9057	Jun 27, 2025, 06:17 AM	Seeger McCarthy	This project to improve transit service along the southern part of the lossan corridor is going to be essential for a transit first future where we need reliable train service that isn't subject to random shutdowns. For that reason, in a future where sea level rise will continue eroding at the del mar bluffs, a tunnel is needed to carry trains through del mar. The Camino del mar option is by far the most logical because it requires the least tunneling and is cheapest. With money saved by the shorter tunnels under camino del mar, it is an obvious choice to future proof the line for electrification by making the tunnels wide enough for overhead wires. Electrification is the gold standard for passenger rail in the

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			world, it will decrease travel times as we have seen on Caltrain, and it is much greener than any other technology. Hydrogen trains are currently unproven for fast passenger service, and the production of hydrogen isn't even green, it produces a ton of CO2. The production of lithium ion batteries for use in passenger trains is also extremely CO2 intensive, and the heavy battery on BEMU trains will force slower speeds and slower acceleration. For these reasons I am urging Sandag to include a provision to build the del mar tunnels so that they can one day have overhead wires. This is a choice that people 50 years from now will thank us for, and will open the possibility of making the lossan corridor one of the best rail corridors in the country.
9056	Jun 26, 2025, 11:22 PM	David Choy	I greatly appreciate the work done to develop these 4 options. As a resident of San Diego, I have used the LOSSAN corridor for regional trips during college and for leisure travel. My personal concerns for this project is increased track speed, double tracking, preserving scenic views, resilience against erosion, and increasing safety for trains and pedestrians. My 1st preference is the San Dieguito Bridge to I-5 Alternative Alignment. This design appears to provide the most scenic views while accomplishing my above concerns. My 2nd preference is the Under Camino Del Mar Alternative Alignment. This design provides the next minimal about of tunneling and preserves the most of the original scenic views. I do not want the Under Crest Canyon Alternative Alignment, as this is the most tunneling. While the Del Mar Bluffs Double Track Reinforced Alternative Alignment does preserve the original views, I do not believe to be sustainable long term with increased erosion. Additional, there are continued safety concerns with pedestrian access that are conflict with rail safety. Finally, I would recommend that reports in the future remove the "alternative alignment" phrase. While technically true, it can be confusing and poor messaging. Thank you for time. David J. Choy
9055	Jun 26, 2025, 08:44 PM	Travus Clark	My name is Travus Clark. I am a regular rider on the LOSSAN corridor. I have seen firsthand how slower alignments and antiquated train sets contribute to low ridership. The majority of those I know do not take the train because it is slower and less reliable than driving. I support any alternative that is designed for the highest speeds possible and accommodates future electrification. The second densest corridor in the nation must be

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			transformed to a system that is up to the standard found across the rest of the world if we truly want to make rail transit an appealing option to the majority of the traveling public.
9054	Jun 26, 2025, 08:39 PM	Theodore R Deckard Jr	The Lossan Rail Realignment is a great plan, especially for the future. I am certain that you plan is also looking to put the Pacific Surfliner on the freeway as well. Because if you look the Arcadia line on the Los Angeles MTA runs along the freeway as well as the Downey line. And there was some issues. Maybe if you contact the MTA. It may help with this project. I understand that your customers enjoy the ocean view, however with climate change and the erosion of the cliffs, you have to keep closing that part of the line. Its going to keep costing a lot of closures, manpower and revenue. And keep impacting the environment. Thank you.
9051	Jun 26, 2025, 05:48 PM	Ludi Wang	To whom it may concern, While I hope either the Camino Del Mar or Crest Canyon alignment is built, I think the most important thing is to ensure that the tunnels are properly sized for electric catenary wires. It would be a horrifying waste of hundreds of millions of taxpayer dollars for a rail project in the 21rst century to not only not support, but to lock out the entire LOSSAN corridor from being electrified for probably the next century. It would likely be better to not build it at all if that were to be the case until sufficient funding is found. Sincerely, Ludi Wang
9050	Jun 26, 2025, 05:46 PM	Cherie Mclarty	It is most unfortunate that the tracks were out along the coast. Past mistakes do not need to be built upon. Instead we should be building towards the future. Climate change is eating away the coastline and will continue to cause erosion. In order to preserve the coast and the railway the tracks need to somehow follow the freeway corridor. Of course it will take more money and time but will save lives and the California beach of the future.
9049	Jun 26, 2025, 04:54 PM	Alex Wong	I strongly support the Crest Canyon Alternative. It is the least expensive alternative. It will be the fastest to construct. And it will cut down travel times the most. I also urge SANDAG to ensure the tunnels are big enough to accommodate overhead catenary wires for electric trains. Let's not kid ourselves with battery electric or hydrogen trains, both of which are slower and have much more downtime (due to charging) than overhead catenary electric trains. We need our trains to be as reliable as possible with minimal downtime so they can be as frequent as possible.
9048	Jun 26, 2025, 04:44 PM	Ked Garden	Move the train! And give us back our bluffs and beach!

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9047	Jun 26, 2025, 04:14 PM	Justine Feighery	I'm writing to express my concern about building a sea wall to sustain a rail system by the beach. Seawalls are detrimental to the sustainability of our beaches. I believe there can be public transport, which is in favor of, that does not harm our beaches. Please consider moving the train tracks away from the beach
9046	Jun 26, 2025, 03:44 PM	Shannon Worley	The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year.
9045	Jun 26, 2025, 03:16 PM	Utaw Cuseo-White	Please move the track inland. Now is the best and cheapest that effort will ever be. Keeping it on the coast detrimental to our beaches and community.
9044	Jun 26, 2025, 03:10 PM	Chris Collins	I prefer either the route that passes under Crest Canyon or the one that passes under Camino Del Mar. I rode this line frequently in the past, especially when I was living in LA and visiting home in San Diego (where I now reside again). I think these routes are the best because my biggest concern is train speed. I also would like SANDAG to consider giving the tunnel enough clearance for future electrification.
9043	Jun 26, 2025, 02:19 PM	Rita Haley	Take the rail off the bluff. Do what is fundamentally right. When you know better, you do better. Fix the mistake of putting a train on an ocean bluff.
9042	Jun 26, 2025, 01:33 PM	Derrick Claar	To whom it may concern: The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR, nor the most logical. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation, as well as eventually needing to relocate once it becomes unfeasible to continue maintining its current location. Trenching and double tracking the train along bluffs is also unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs.

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			The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with one of the other alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. I personally, along with The Surfrider Foundation, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. We are all 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas. Thank you, Derrick Claar
9041	Jun 26, 2025, 01:32 PM	Michael Sullivan	It seems short-sighted to keep the tracks on the bluffs given the history of erosion. I don't support the Del Mar Bluffs Double Track Reinforced Alternative Alignment. I acknowledge there's no easy alternative here (if there were, we'd probably have a decision already.) If tunneling is part of the solution, let's make sure it's large enough to accommodate future all-electric trains. The success of electric trains in the Bay Area has increased their ridership and is an important tool in meeting our climate goals.
9040	Jun 26, 2025, 11:58 AM	James Dealy	I fully support the Under Crest Canyon alignment and leave room for Overhead Electrification like Caltrain up in the Bay Area such that our state can eventually have one cohesive electrification system. I am also in complete opposition to the Reinforced Bluffs Alignment and the I-5 Alignment as they both either cost too much and are too slow, or are actively harmful to our coastal access and are also at odds with the California Coastal Commission’s position. Please stop delaying this project to appease a very small coastal city when theh both do not have access to the rail line and also intentionally voted against having access in the past. It is clear that the vast majority are not interested in good faith discussions about the feasible alignments and are looking to delay the project until outright cancellation.
9039	Jun 26, 2025, 11:00 AM	Marie Cyr	I hope that your decision to move the train track will go into effect in order to save our beaches.
9038	Jun 26, 2025, 10:05 AM	Lynwood C Lary	I am opposed to the continued stabilization of the existing train tracks in Del Mar. It makes no sense to continue to support something that we know will continue to erode and

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			eventually fail. I would support any of the three alternate routes that are being considered. I have great confidence in the ability for a tunnel route through Del Mar to be successful. There to tunnels in LA and Florida that appear to be working very well.
9037	Jun 26, 2025, 09:56 AM	Ethan Blake Elshyeb	Hi! I'm writing to support the construction of high speed tunnels for the realignment project. It's absolutely necessary given the erosion near the existing tracks. I also want to call out that the tunnels MUST leave room for caternary wire in order to support modern high frequency service. It is NOT in violation of the Coastal Act and other considered alternatives like hydrogen are simply unfeasible to pull off safely.
9036	Jun 26, 2025, 09:52 AM	Jeremy Walsh	Save our beaches! And the communities!!!
9035	Jun 26, 2025, 09:29 AM	Mr. TJ Mahoney	I support the Train. I'm in favor of coastal protections such as sea walls, rocks, concrete and steel as well as other hard structures to protect beaches, bluffs, homes, parks, roads and trains. We need more harbors, break walls, rock groins, piers, bluff stabilizations, etc. to preserve family oriented facilities.
9034	Jun 26, 2025, 08:56 AM	Udo Wahn	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the other alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and

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			away from an encroaching ocean. I believe that that the Yellow line option traveling East from the Ag District's Special events platform and North of the San Dieguito Lagoon makes the most sense! The revised NOP mentions that option will be looked at, but was not drawn on the map. Confusing many readers. This option would have the least impact on Del Mar residents (42 years) like myself and other stakeholders.
9033	Jun 26, 2025, 08:45 AM	Linda Farrell	I agree w/ relocating the rail line safely away from the bluffs of Del Mar. Please do not continue w/ the current plan to sacrifice this beautiful beach area by yet again trying to make it sustainable. It's a no brainer to redirect the rail line where there is ample space to do so. Please reconsider the current plans. Thanks for your consideration. Linda Farrell
9032	Jun 26, 2025, 08:28 AM	Caitlin Allen	Please move the train! These beaches are so special to us as a community and there are alternatives. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. Please leave our beaches alone, we love them!
9031	Jun 26, 2025, 08:05 AM	Beth Mattfolk	SANDAG you must research the NYL that avoids homes and businesses.
9030	Jun 26, 2025, 06:31 AM	Lacey Levitt	Please keep your previous commitment to relocate the train off of Del Mar's eroding bluffs. Keeping the train in place would continue this unending struggle against Mother Nature, requiring deep trenching into the bluffs and building seawalls across almost 1.7 miles of beach. In addition to forever destroying the bluffs' natural beauty, the seawalls would subject the beach to accelerated erosion and eventually, permanent beach loss, as sea levels continue to rise.
9028	Jun 26, 2025, 12:18 AM	Stephanie L	The train needs to move off of Del Mar's eroding bluffs. It's decades overdue. Please do not waste more time and money researching what we already know: the bluffs are not a viable long-term home for the train, and the public will not accept beach-eroding seawalls to keep it there.
9027	Jun 25, 2025, 11:37 PM	Sean Fowler	I support moving the train tracks away from the Del Mar bluffs and do not support continued coastal hardening that destroys the character and beauty of this precious area. The trackway on the Del Mar bluffs should be remade into a public park for all to enjoy.
9026	Jun 25, 2025, 10:46 PM	Jill Queri	Protect our coastline and preserve Del Mar's natural beauty! Do not continue to destroy this environment via train line development. Leave our natural spaces be!

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9025	Jun 25, 2025, 10:31 PM	Martin Marcus	Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
9024	Jun 25, 2025, 10:30 PM	Alana Mae	Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation.
9023	Jun 25, 2025, 10:29 PM	Alana Vinas	Keep SD beaches safe!!!
9022	Jun 25, 2025, 09:57 PM	Kristy Hobbs	Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
9021	Jun 25, 2025, 09:32 PM	Teo Nalani	The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. I don't want to lose even more beach from local areas.

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9020	Jun 25, 2025, 09:24 PM	Charlie Bragunier	Don’t waste money, resources and precious outdoor beauty of the coastal bluffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources.
9019	Jun 25, 2025, 08:30 PM	David Pearson	The most only sensible long term solution is to move the tracks. Reinforcing existing bluffs is a futile effort. Please move forward with a plan that moves the tracks from the bluff. Alternative routes such as the one that goes along Del Mar racetrack would provide an opportunity for a stop a major SD county destination. Find more win-wins and avoid the mediocre.
9018	Jun 25, 2025, 08:20 PM	Jennifer Jessee	Please do not leave the train tracks where they are currently. This is not the right move for the environment, the residents and visitors of Del Mar and the train riders. The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. It's time to make the right choice and move the train to ensure it doesn't continue to require millions of taxpayer dollars and impact the environment. Thank you, Jennifer Jessee
9015	Jun 25, 2025, 05:34 PM	Julie Wartell	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the

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			public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
9014	Jun 25, 2025, 05:31 PM	Kiera Clubb	What drew me to San Diego was the the beautiful coastline and bluffs overlooking the ocean. The gorgeous blooms and visible timeline of layered rock on the bluffs is breathtaking. Hundreds of people walk the Del Mar beach to Torrey Pines (or vice versa) DAILY (if not more). Not only would the the new Del Mar Double Track Reinforced Alternative be extremely unattractive, it would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. The natural habitat that the plants, animals, and birds call home would be destroyed. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, like Del Mar's unique coastal bluffs.
9013	Jun 25, 2025, 05:25 PM	adriana santo tomas	The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources.
9012	Jun 25, 2025, 05:03 PM	Dustin Conlon	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Thank you, Dustin Conlon
9011	Jun 25, 2025, 05:02 PM	Victoria Conlon	The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and

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			away from rising seas. Thank you for your consideration, Victoria Conlon San Diego County Resident
9010	Jun 25, 2025, 04:41 PM	Jessica Dent	I am a frequent rider of the Coaster train as part of my commute to downtown San Diego. While the view is beautiful, it is unnerving that the track is constantly under threat of collapse due to the location. As a North County resident I belive the best option is to eliminate the Del Mar Double Track Reinforced Alternative and instead opt for one of the more environmentally sounds and long-term sustainable solutions proposed. Some additional reasoning below: — Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. — Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. — The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources.
9008	Jun 25, 2025, 04:35 PM	Thuan Do	Please ensure that the new trains will be electrified - we gotta meet our environmental needs and also electric trains are faster and more efficient
9007	Jun 25, 2025, 04:15 PM	isaac parker	I personally think that the San Dieguito bridge to I-5 alternative allignment would be the best relocation option. I think this because it prevents the issue at hand, of the damage that is being caused towards the beach, and the location of the I-5 already has the sound and pollution that comes with transportation, so why would we not try to keep the transportation near itself, which makes less overall area encumbered by mass transportation, taking up little more space than already was being used. It has the least impact on our environment, and the smallest usage of land. Thank you for reading my submission, best regards.

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9006	Jun 25, 2025, 04:00 PM	Carolyn Marsden	The train must be moved! Not moving it is delaying the inevitable. If the train is not moved, our precious beaches will be lost.
9005	Jun 25, 2025, 03:45 PM	Jason Valadez	The alignment under Camino Del Mar seems to be the most practical in terms of environmental and community impact because it tunnels under everything and economic impact because it's shorter and probably cheaper than the other proposed tunnels. Only potential downside is its relative closeness to the bluffs compared to the other tunnels but it should be far enough away to be fine for the future. It would also help trains maintain speed since its curves aren't too sharp. (PS, please also plan a tunnel under the UCSD area to help double trackage and speed issues.)
9003	Jun 25, 2025, 03:09 PM	Diana Forero-Cook	Eroding the beach is not a viable option. Other routes need to be considered to preserve the coastline. We cannot continue with this short sighted thinking.
9002	Jun 25, 2025, 03:08 PM	Andrew Lange	Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation
9001	Jun 25, 2025, 02:56 PM	Kevin Wood	Support for Overhead electric wires and the Cayon Crest Alternative- Emissions and Speed matter! I am a frequent rider for both Coaster trains when going to North County and Amtrak to visit LA and Orange County. Getting the tracks off the bluffs as soon as possible is very important, and the Cayon Crest offers the most direct, highest speed option the EIR should consider the benefits of improved speed both to existing riders and in getting more folks to take the train instead of driving. Additionally, overhead catenary wire is a mature and well understood technology. Based on Experience with some hydrogen car pilot products and I don't think that hydrogen trains can offer the same benefits and reliability that overhead wires can. Germany is already abandoning some hydrogen train projects. The visual impact of wire is minimal on an existing or even a new rail corridor. I have ridden electric trains through some very scenic parts of Switzerland and Austria and the wire have very little impact.
9000	Jun 25, 2025, 02:55 PM	Laura Williams	I hope this message finds you well. I am writing to express my strong concerns regarding the proposed Del Mar Double Track Reinforced Alternative and its potential impacts on our coastal environment. Firstly, this alternative poses a significant threat to the bluffs and beaches that attract over a million visitors each year, including myself. It is clear that this option cannot be considered the least environmentally damaging alternative in the context of the Draft Environmental Impact Report (EIR). The proposed trenching, stabilizing, and armoring of the bluffs would result in severe and irreversible impacts across several critical categories,

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			including Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Moreover, it is important to note that trenching and double tracking the train along the bluffs is unlawful under California law. Specifically, it violates Coastal Act Section 30253(b), which mandates that new developments must ensure stability and structural integrity without relying on protective devices that significantly alter natural landforms along bluffs and cliffs. Additionally, the option of leaving the train in place has been dismissed multiple times over the past 15 years. I urge you to discard this option once and for all and instead focus on the tunnel alternatives, which are environmentally superior. These alternatives not only ensure the long-term viability of the LOSSAN corridor but also protect our invaluable coastal resources. Organizations such as Surfrider, the Coastal Commission, and CA State Parks have all voiced their opposition to the proposed option, citing its potential to destroy irreplaceable coastal resources, including Del Mar's unique bluffs and the public beaches below. I wholeheartedly agree that the environmental impacts of this alternative cannot be mitigated. Given the realities of sea level rise and the urgent need to preserve our coastal resources, it is imperative that we relocate the train to a safer location. This action will not only safeguard the beach for future generations but also protect the LOSSAN rail corridor from the threats posed by rising seas. Thank you for considering these critical points. I look forward to your response and hope for a decision that prioritizes the preservation of our coastal environment. Best regards, Laura J. Williams
8999	Jun 25, 2025, 02:50 PM	Erik Gantzel	I urge SANDAG to move the rail line AWAY from coastal bluffs in Del Mar. I don't care whether the rail line follows Camino del Mar or I-5, but it must be moved from the eroding coastal bluffs. Armoring the bluffs with seawalls is a temporary, band-aid solution that is destroying and will continue to destroy the beaches below, with ripple effects to beaches beyond those directly adjacent to the sea walls. I have been a San Diego resident since I was born here in 1964, and I have enjoyed using the beaches of Del Mar, Torrey Pines, and La Jolla throughout my life. The beaches are a priceless resource than cannot be replaced.

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			The rail line, however, can be rerouted away from the bluffs. Please do not allow more money to be poured down the drain of coastal armoring, and instead spend that money on the permanent solution.
8998	Jun 25, 2025, 02:38 PM	Spencer Higgs	As someone who uses the train along the Del Mar coastline (in fact, I'm picking a friend up after his journey south from Santa Barbara tomorrow evening), I love the LOSSAN rail corridor. Nonetheless, the idea of maintaining or expanding this section of the rail line can only be seen as dangerous and futile. The increasing impacts of sea level rise and cliff erosion make trying to "fight mother nature" a losing battle, and one San Diegans will not want to continue paying for with their tax dollars or their safety. I urge SANDAG to continue investigating alternatives, and to prioritize moving this part of the corridor to a safer and less vulnerable area. I also echo these points: The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly, this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double-tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.

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8997	Jun 25, 2025, 02:35 PM	Lisa Thompson	Please put Mother Earth over your own pockets. You should go back and reread The Lorax by Dr. Seuss. Have a conscious and do the RIGHT thing, PLEASE.
8996	Jun 25, 2025, 02:08 PM	Sydney Benjamin	Please consider the tunnel alternatives, it's the only viable long-term option that will protect and preserve our shoreline. I am a climate change researcher, I am a geographer, I study environmental impacts and trying to reinforce the bluffs would be short-sighted. With sea level rise, erosion, and more, the train tracks will just have to be moved anyways in the coming years. We need to start being proactive about these things, not really sure how this is still under debate. The best option to preserve both our beaches and our rail access is to consider the tunnel alternatives, not the reinforcement.
8995	Jun 25, 2025, 02:01 PM	Eli Scandalis	Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
8994	Jun 25, 2025, 01:52 PM	Nora Wilcox	We need to protect our coastlines!!
8993	Jun 25, 2025, 01:41 PM	Neil Stanton	Please consider saving our beautiful beaches!
8992	Jun 25, 2025, 01:39 PM	Brian Bosse	Please eliminate the Double Track and Under Camino Del Mar options from consideration, these will just continue the constant environmental destruction and is short-sighted. Myself, along with Surfrider, the Coastal Commission, and CA State Parks all oppose these options because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas. Thank you!
8991	Jun 25, 2025, 01:21 PM	Madison Pound	The bluffs provide a critical ecosystem both for marine and local wildlife. Allowing the trains to continue along the bluffs will only expedite erosion, furthering the loss of our beaches and marine environment.
8990	Jun 25, 2025, 01:11 PM	Louis Hock	Please move the train off the cliffs along with the existing sea walls in DelMar. The beach is for everyone and cannot be replaced. The tracks can be moved.

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8989	Jun 25, 2025, 01:07 PM	Kristen Conner	Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation.
8986	Jun 25, 2025, 12:38 PM	Marissa Roberts	Keeping the train on the shoreline near Del Mar will not only continue to erode the beach, but it will significantly cost taxpayers in maintenance in the years to come! Please do what's right and relocate the train. Additionally, safety is a huge concern with the threat to eroding cliffs and keeping it in it's current location will undoubtedly risk human lives.
8985	Jun 25, 2025, 12:28 PM	An Tran	Dear SANDAG, The LOSSAN Rail Realignment project is harmful and illegal. This cannot be the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. There are other alternatives that would be more sustainable for transportation, the environment and future generations.
8984	Jun 25, 2025, 12:24 PM	Jeanna Vazquez	I am 100% in agreement with the positions of Surfrider, the Coastal Commission, California State Parks, and the beachgoing public that the Del Mar Double Track Reinforced Alternative should be discarded from consideration in this Draft EIR. Trenching and double tracking along the bluffs would require, in your own words, bluff stabilization and new seawalls, which would be unlawful according to Coastal Act Section 30253(b). The negative impacts to Del Mar's bluffs and beaches would be permanent and irreversible, leading to total beach loss as sea levels rise. Furthermore, maintenance of the rail would become increasingly difficult, costly, and infeasible with sea level rise. Even the best engineering will ultimately succumb to the ocean's power. Upfront costs to this alternative may be lower than tunneling, but overall long-term costs could be higher due to uncertainties around battling indefinitely against bluff erosion, extreme weather from climate change, and sea level rise. Should you refuse to discard the Double Track Reinforced option from study in this Draft EIR, those potential costs must be studied along with the irreversible impacts to the bluffs, the beach, and public access to them. Relocating the train away from the bluffs is clearly the most sustainable, long-term solution

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			to ensuring the LOSSAN corridor remains in operation and achieves its laudable goals. I implore you to stay the course on rail relocation. Thank you for considering my comment. For the welfare of future generations, please discard the Double Track Reinforced option from study in this Draft EIR. Thank you, Jeanna
8983	Jun 25, 2025, 11:52 AM	Grace Urbiztondo	We want to preserve our beach Del Mar and NO to Annihilation!
8982	Jun 25, 2025, 11:37 AM	Michael Esten	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year.
8981	Jun 25, 2025, 11:25 AM	Charles Richmond	I owned 140-142 11th St in Del Mar from 1986 to 2009. At that time, I saw the lifeguard station on 11th Street go from 25 feet out on bluffs to none because the area was gone. This will continue to happen all along the bluffs. Arming the bluffs prevents sand from developing from natural wear of the sandstone bluffs, resulting in no sand on Del Mar Beaches, and incredible liability to the city of Del Mar and the North County Transit District. Leaving the Train on the buffers is guaranteed to get those results financially liablity.
8980	Jun 25, 2025, 11:24 AM	Erica Ellis	The ethical course of action SANDAG would be to reroute to avoid further eroding the Del Mar Beach. This would not limit access to the beach to locals or those with access to private transport. Already there is not a stop near the beach, and rerouting the rail (as SANDAG previously guaranteed would be their course of action) to add a stop with trail access to the beach would increase community access to the beach. Overall, the only reason not to reroute would be to save money, and right now Americans in general and Californians in particular are deeply exhausted by corruption in the name of money. Let's preserve California.
8978	Jun 25, 2025, 11:17 AM	Carol M Donohue	Preserve the bluff. Tunnel the train to a safer route away from the Del Mar Bluffs. Coastal preservation should be our primary goal.
8977	Jun 25, 2025, 11:16 AM	Mikayla Mitchell	I strongly oppose the proposed Del Mar Double Track Reinforced Alternative. It is environmentally destructive, unlawful under the Coastal Act, and completely out of alignment with long-term climate resilience. I’m a 3rd generation San Diegan. This plan would devastate the Del Mar bluffs and

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			beaches, irreplaceable public resources that over a million people, including myself, rely on for recreation, beauty, and connection to nature. The impacts to aesthetics, geology, land use, biological resources, and public access are irreversible and cannot be mitigated. Building a trench and armoring the bluffs directly VIOLATES Coastal Act Section 30253(b), which prohibits development that relies on protective devices or alters natural landforms. This alone should disqualify the bluffside alternative from further consideration. The environmentally superior option is clear: move the rail line off the bluffs and into a tunnel. Tunnel alternatives protect both the LOSSAN corridor and the fragile coastline from sea level rise, erosion, and collapse, all of which are accelerating. Surfrider, the Coastal Commission, and California State Parks all OPPOSE the bluffside alternative for good reason. I stand with them in urging you to immediately remove this option from the EIR and move forward with tunnel-based solutions. Thank you, Mikayla Mitchell
8975	Jun 25, 2025, 11:12 AM	James Royer	Not relocating the train tracks off the Del Mar bluffs is reckless, short sighted, and will be detrimental to the coastal habitat, accessibility, and existence of Del Mar's beaches. Invest in Del Mar and San Diego's natural, and economic attractiveness by relocating infrastructure as opposed to attempting to barricade it. Armored shorelines have been proven detrimental in everything from creeks, rivers, estuaries, and ocean coastlines. Keeping the train tracks on the bluffs will surely ruin the shoreline for decades to come.
8974	Jun 25, 2025, 11:07 AM	Jordan Erickson	Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
8973	Jun 25, 2025, 11:05 AM	Kristen Werner	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources.

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8971	Jun 25, 2025, 10:59 AM	Elizabeth North	PLEASE REROUTE the railroad track away from the bluff. It just makes sense. THANKS!!!
8970	Jun 25, 2025, 10:48 AM	Vivian Marrs	Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
8969	Jun 25, 2025, 10:44 AM	Joanna Luna	Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
8968	Jun 25, 2025, 10:42 AM	Cassandra Jones	This is disgustingly unacceptable!!!!!! There is very little of Mother Earth left in Southern California and these developments need to STOP!!!!!!!! Instead of continuing destroying these lands, focus on what is already developed and improve those for efforts to grow transportation ease. Not leveling what natural beauty is left. This is nothing more than new ways for the already rich to get richer. STOP THIS NOW!!!!!!!! You are destroying what makes So Cal so special. I will not participate with this development in anyway and never use this source of transportation. There are other ways, STOP DESTROYING THESE LANDS!!!!!!!!!!
8966	Jun 25, 2025, 10:31 AM	Audrey Wehba	Hello, I am a regular Coaster and Amtrak passenger and am aware of how every winter, I can expect service to be frequently disrupted due to bluff instability. This is also the case after an earthquake. Year after year, the solution is reinforcement. This is not sustainable. The track must be relocated away from the bluffs to ensure consistent service and prevent further beach loss.
8964	Jun 25, 2025, 10:29 AM	Craig W Smith	Please proceed as quickly as possible with the rail realignment project. It's a bitter pill, but further delay will only increase the costs of a project that is long overdue. Armoring the coastline is unacceptable. It will destroy the beaches and subject a critical transportations and shipping line to unacceptable risks. Sea-level rise is inevitable and it's happening NOW. Take the long view and move the rail line as far inland as engineering will allow: select the San Dieguito Bridge to I-5 route.

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8963	Jun 25, 2025, 10:20 AM	William Fenick	Save the cliffs. Move the railway inland. Simple. Any new rail work on the cliffs will only require major structural improvements during the rails life. The cliffs do not need a railway on them. It's unsafe for passengers and unsustainable. Invest now in the right approach, not the existing approach.
8962	Jun 25, 2025, 10:15 AM	John Barry	I oppose your idea of leaving the tracks where they are and building more seawalls etc. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
8960	Jun 25, 2025, 10:11 AM	Nancy Himel Brisco	The only ecologically correct thing to do is preserve both Del Mar's beaches and cliffs. Reroute the train!!!
8959	Jun 25, 2025, 10:09 AM	Paul Grantham	Please make permanent changes to the rail line between LA and San Diego that recognize the climate change is happening and the rail line is a critical transportation link for San Diego County. Short term "easy fixes" are wasting time and money that is needed for this critical infrastructure change.
8958	Jun 25, 2025, 10:03 AM	Adam Whitney	Reinforcing the Del Mar bluffs is a battle with mother nature that you are sure to lose. It would mean ongoing and ever increasing maintenance costs as sea levels continue to rise. And it would mean accelerating and permanent beach loss of one of the last few places where San Diegans can go to find relatively unpopulated beaches. Please don't make the mistake of choosing this disastrous option.
8956	Jun 25, 2025, 09:59 AM	Rafal Dobrowolski	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources.

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			Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
8955	Jun 25, 2025, 09:58 AM	John Hall Jr	Climate change can not be ignored. Move the tracks to permanent location away from bluffs. This is the only solution...
8954	Jun 25, 2025, 09:56 AM	Beth Chenoweth	Please relocate the train tracks with a tunnel instead of along the beach in Del Mar. I raised my kids on that beach and cannot imagine that stretch without such a lovely place to be. I am a native San Diegan and value our way of life here, especially the ocean/beach and sea life that is precious.
8953	Jun 25, 2025, 09:56 AM	Tansy Woods	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.
8952	Jun 25, 2025, 09:56 AM	John Moss	Hard scapes excelerate beach, sand and cliffside erosion. Broad Beach in Malibu, Oceanside and many other hard scapes are examples.

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			The tunnel option moves the rail project towards a more friendly, long lasting and safer alternative. Thank you.
8951	Jun 25, 2025, 09:54 AM	Juliana Collins	I live in Del Mar and strongly believe that the rail tracks in Del Mar need to be relocated off of the costal bluffs. Abandoning the relocation and instead reinforcing the double train rail on the Del Mar bluffs permanently damages and destroys Del Mar's beautiful, unique sandstone bluffs, as well as, accelerating loss of sand and shore bird nesting habitats. Please relocate the rail line.
8950	Jun 25, 2025, 09:54 AM	Taylor McPherson	It would be beyond arrogant to not relocate the line. Destroying the bluffs and San Diego shoreline is not worth saving a couple bucks. Stop being cheap. Stop taking from citizens and giving to corporations. I do not understand how this is even a debate.
8949	Jun 25, 2025, 09:53 AM	Malina Cate	The new Del Mar Double Track Reinforced Alternative would mean certain doom for the bluffs and beaches that over a million people, including myself, visit each year. Clearly this cannot be considered the least environmentally damaging alternative for purposes of this Draft EIR. Trenching, stabilizing, and armoring the bluffs would impose grave, irreversible impacts that cannot be mitigated in the following categories: Aesthetics, Geology and Soils, Land Use and Planning, Biological Resources, and Recreation. Trenching and double tracking the train along bluffs is unlawful in California because it disregards Coastal Act Section 30253(b), which requires new development to ensure stability and structural integrity without reliance on protective devices that substantially alter natural landforms along bluffs and cliffs. The option of leaving the train in place has been eliminated from consideration multiple times in the past 15 years. Please discard this option from consideration and move forward with the tunnel alternatives, which are environmentally superior because they ensure the long-term viability of the LOSSAN corridor while preserving precious coastal resources. Surfrider, the Coastal Commission, and CA State Parks all oppose this option because it will destroy irreplaceable coastal resources, including Del Mar's unique coastal bluffs and the public beaches below. I am 100% in agreement that these environmental impacts cannot be mitigated. Sea level rise and the need to preserve our coastal resources necessitates relocating the train to a safer location, not only to preserve the beach for future generations, but also to preserve the LOSSAN rail corridor by getting it off the bluffs and away from rising seas.

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8948	Jun 25, 2025, 09:52 AM	Pamela Heatherington	The Environmental Center of San Diego strongly opposes reinforcing the train on the bluffs and permanently destroying Del Mar's beaches. Please get your head out of the sand and on to the beach!
8947	Jun 25, 2025, 09:52 AM	Douglas Reese	Rail tracks on the bluff are and will always be unstable and temporary. Stabilizing efforts are band-aids that are expensive, only temporarily effective, and cause additional erosion and loss of beach. Resolve the root cause of the problem by permanently relocating the tracks off the bluff. It's Del Mar so there'll be opposition no matter what choice you make so fortify yourselves and solve the root cause of the problem rather than pushing this down the road at great cost with a temporary solution. Thanks, Doug Reese Rancho Santa Fe resident, former Del Mar resident, and frequent beach-goer and surfer in Del Mar
8946	Jun 25, 2025, 09:51 AM	Cassie Wilson	I strongly oppose the Del Mar Double Track Reinforced Alternative and any plan to retain the train tracks on the fragile coastal bluffs. This proposal would spell certain and irreversible destruction for the bluffs and beaches that over a million people, including myself, cherish each year. It fails to meet the criteria for the least environmentally damaging alternative under CEQA, as trenching and armoring the bluffs would cause permanent harm to aesthetics, geology, land use, biological resources, and recreation. This alternative also violates California Coastal Act Section 30253(b) by relying on protective devices that drastically alter natural landforms. State agencies like the Coastal Commission, CA State Parks, and Surfrider Foundation rightly oppose this option, recognizing that these impacts are unmitigable. Sea level rise demands we move the rail inland—not further entrench it along the coast. Environmentally superior tunnel alternatives exist and must be prioritized to preserve both Del Mar’s bluffs and the long-term viability of the LOSSAN corridor. Please help ensure long term sustainability and protection for our beaches!
8945	Jun 25, 2025, 09:50 AM	Tom Gable	As a Del Mar and Solana Beach area resident for more than 50 years, I support the SANDAG plan to improve the tracking along the coast, with the Del Mar Double Track Reinforced Alternative. The reinforcement plan is the soundest for protecting bluffs and providing better tracks for Amtrak and the Coaster. It is also the lowest-cost alternative, by far.
8944	Jun 25, 2025, 09:50 AM	Julianna Sisco	I believe our beaches must be preserved! The “Del Mar Double Track Reinforced” option is completely unacceptable. I am in strong opposition to reinforcing the train on the bluffs and permanently destroying Del Mar's beaches. Don’t derail our shoreline! This is serious. You have backpedaled from your previous commitment to relocate the train off of Del

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			Mar's eroding bluffs. You are now considering keeping the train in place indefinitely, despite over 20 years of costly, continuous, beach-killing bluff stabilization work to prevent the railroad from collapsing onto the beach. Keeping the train in place would continue this unending struggle against Mother Nature, requiring deep trenching into the bluffs and building seawalls across almost 1.7 miles of beach. In addition to forever destroying the bluffs' natural beauty, the seawalls would subject the beach to accelerated erosion and eventually, permanent beach loss, as sea levels continue to rise. Please don't do this!
8943	Jun 25, 2025, 09:49 AM	Jack Case	This beach needs to be saved. It is a beautiful beach where everyone can bond no matter their age, race, or sexuality. If the train is not moved it could ruin this iconic beach and nature that lives there.
8942	Jun 25, 2025, 09:48 AM	Jesse Goldberg	NO SEA WALLS!!!!!! SERIOUSLY WAKE UP!!!!!!
8941	Jun 25, 2025, 09:48 AM	Josh Naganoma	Refusing to relocate the train pathway is not only unlawful, it is inherently and actively diminishing to the integrity of the ocean. Countless scientific studies have demonstrated, proven, and reiterated the importance of California's coastline and ignoring such facts is irresponsible to the citizens of California and to the planet.
8940	Jun 25, 2025, 09:48 AM	Mike Pawka	Rather than a stopgap solutions, please do it right
8939	Jun 25, 2025, 09:46 AM	Julie D. Rosoff	Please relocate the tracks. Retain Del Mar's pristine beaches.
8937	Jun 25, 2025, 09:09 AM	Steven Ellison	The Camino Del Mar route is obviously the best one. The shortest tunnel saves the most money, while still avoiding the crumbling bluffs. Make sure the tunnels are set up for future electrification, or future speed increases. It's kind of insane how up in arms some people are about this project, when it will only benefit the people in Del Mar. Minimal impact during construction but the NIMBYs are fighting tooth and nail to maintain the status quo. Whatever plan is selected, you should ensure there's a stop at the fairgrounds. It's crazy that there's no way to take a train to the fair right now.
8934	Jun 25, 2025, 07:58 AM	Fernandez Fernandez	I am a resident of Rancho Peñasquitos and an occasional rider of the Pacific Surfliner, typically traveling northbound to Oceanside or Los Angeles. My limited use of the train is primarily due to two factors: driving is often faster or more convenient, and frequent maintenance closures disrupt service. This is unfortunate, as the LOSSAN corridor serves commercial hubs and offers a viable alternative to the heavily congested I-5.

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			The LOSSAN corridor is the second busiest rail line in the United States, surpassed only by the Northeast Corridor. It is unacceptable that this vital line is constantly under repair due to bluff collapses in Del Mar and San Clemente. Realigning the corridor through this project could serve as a model for similar improvements elsewhere. Therefore, it is critical that SANDAG selects an alignment that ensures long-term resilience. A no-build option or continued reinforcement of the existing right-of-way is not viable. Among the proposed alternatives, the Crest Canyon Tunnel stands out as the most effective. While the Camino Del Mar Tunnel may impact the Peñasquitos Lagoon and the I-5 Tunnel suffers from low speeds (30 mph), the Crest Canyon Tunnel supports speeds up to 110 mph and has the least environmental impact. To attract drivers to rail, we must make the service faster and more reliable. Double-tracking and electrification are key. Fortunately, all proposed alignments support double-tracking, which will improve reliability. Currently, the Coaster averages 40 mph with a top speed of 90 mph. Electrification could raise speeds to 125 mph, making rail a more attractive option than driving. It is essential that the tunnels be constructed with sufficient clearance for overhead catenaries to allow for future electrification. Reducing tunnel size to save costs would eliminate this possibility. Contrary to the Coastal Commission staff's position, overhead catenaries are not in conflict with the Coastal Act. Both Surfliner and Coaster have committed to providing four trains per hour post-electrification. Are we now abandoning that promise? While hydrogen and battery-powered trains are being explored, they remain unproven and costly. Most of the world relies on conventional electrification, which is efficient, clean, and well-established. Hydrogen infrastructure would require significant investment and pose safety risks, especially in tunnels. Is SANDAG excluding catenary infrastructure from the DEIR due to its interest in hydrogen alternatives? I appreciate the opportunity to comment on this important project. I commend SANDAG for advancing this initiative and urge the agency to select the Crest Canyon alignment for its speed, environmental benefits, and future-proofing potential. Thank you for your work and for considering the views of rail users like myself.

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8930	Jun 24, 2025, 09:47 PM	Wesley Newhart	Electric rail is the best way for commuters like me to get from Oceanside to San Diego. They are efficient and fast and worth the money to build. The first three alternative alignments seem to allow for this improvement and should be invested in further.
8921	Jun 24, 2025, 06:29 PM	Brian Jungman	It seems to me that the "Under Camino Del Mar" option provides the best opportunity for adding another stop or two in the future for a trolley or something more periodic, to me this is the less important half of my comment. I believe that whatever option is chosen, we need to future-proof this for electrification. This doesn't mean install all of the overhead lines as part of this project, but rather any tunneling needs to be done with future electrification requirements in mind. Any tunnel that we build will remain in service for well over 50 years, and there will be no political will to make a new one or expand it in the future. We need to spend more now on larger tunnels.
8905	Jun 24, 2025, 03:22 PM	James Hwang	SANDAG should support the tunneled, doubled tracked options for the LOSSAN corridor (Crest Canyon and Camino Del Mar). A 110 mph tunneled inland service can go from oceanside to San Diego in 30 minutes, making the trip very convenient. These are the only long term sustainable options. No build will result in more and more track closures due to coastal erosion, like we've seen multiple times in the past few years. Reinforcing existing ROW is also a band aid that can't fundamentally address coastal erosion. An inland tunnel is the correct move. And don't let the coastal commission scare SANDAG into engineering out the possibility of overhead electrification. Electrified service is cleaner and much faster than diesel service both on acceleration and top sped. The tunnels should be engineered with the possibility of overhead wires to ensure we invest in high quality services when we are already committing significant public funds to a project. Do not consider hydrogen for these projects. Hydrogen has been a costly boondoggle wherever it's been tried, and even Germany, the pioneer in hydrogen trains, is replacing them with electrification due to the high costs and maintenance issues.
8901	Jun 24, 2025, 02:22 PM	Zachary Bauer	Please make any tunnels big enough to support electric trains. Plan for the future even if it costs us in present.
8893	Jun 24, 2025, 12:33 PM	Kristine Gotta	Please make sure the new tracks allow for electric trains.
8892	Jun 24, 2025, 12:15 PM	Tyler Austgen	No matter the route chosen, the new infrastructure must support eventual electrification. If a new tunnel is built without the requisite space for the overhead lines we are preventing improvements being made until the next tunnel is built. CalTrain finished its electrification project last year and is showing the greatest YoY ridership improvement in the US. Electric trains are faster and more environmentally friendly and run cheaper over

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			time. We should invest in the upfront cost and improve intercity connectedness and ridership on the LOSSAN corridor.
8891	Jun 24, 2025, 12:02 PM	Jonah Gottlieb	Leave room for electrification. Not only is it better for the environment, but electric trains often accelerate faster and are more reliable than diesel trains. Don't waste the opportunity of a lifetime by forcing future generations to rely on outdated technology. Regardless of which tunnel alternative is chosen, it has to be electrification-ready.
8889	Jun 24, 2025, 10:50 AM	Jonathan Rivera	I support the investment in electrifying the train tunnel. This is an investment in San Diego's future that will pay dividends to my children and my children's children. I do not believe cutting corners to avoid electrifying now does anything but maintain an underperforming status quo. Please do what is best for the project and build electric.
8877	Jun 24, 2025, 09:19 AM	Elly Dotseth	I grew up with a father who rode the train to work and back every day. He instilled in me the enjoy of travel by train. In San Diego, the ride from here up to Seattle was something my children, husband and I very much enjoyed, but it took two days and three nights to get there! With the possibility of electrifying our trains, the idea of building a tunnel under Del Mar that would not be large enough to allow for electric cables, is short sighted. I hope that SANDAG, if it chooses the tunnel option, will build it large enough to accommodate electrification. Don't limit the options for better, faster train travel please. I also don't believe it is wise to continue to try to hold back the erosion of the cliffs just to keep the train tracks there. The ocean will always eat away at anything that closer to it.Although some of the scenery will be missed by moving the tracks, perhaps the best option is the alignment with I-5 for part of the tracks.
8876	Jun 24, 2025, 08:58 AM	Zachary Zollman	I am writing in support of planning to allow for electric trains. As a rider of the trains and as someone concerned about climate change, I support electrifying rail lines when possible. I read that a proposed tunnel might be too narrow, preventing a future transition to electric trains. I hope that this will not be the case, and that the plans SANDAG develops will allow for electric trains.
8874	Jun 23, 2025, 06:12 PM	Amy Cheshire	To SANDAG: My name is Amy Cheshire and I live in Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, lagoons, coastal bluffs and canyons. SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods.

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			However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process." I am writing this letter in support of the route residents are calling the "Northern Yellow Line". The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows: From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road. The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds. However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling. The proposed Northern Yellow Line route offers the following advantages. It:

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			1) Has no negative impact on ANY homes or businesses in Del Mar 2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon 3) Has no negative impact on the City of Solana Beach 4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes 5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families. 6) Eliminates expensive tunnels under private property and below sea level 7) Assumes the Fairgrounds will have their special events platform as planned 8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment. Sincerely, Amy Cheshire
8872	Jun 23, 2025, 02:54 PM	Ian Grooms	I would encourage SANDAG to move the LOSSAN rail line off the Del Mar Bluffs. Keeping the rail line on the bluffs would pose a serious risk to public safety. In his 2023 presentation to the Del Mar City Council, Dr. Adam Young from the Scripps Institution of Oceanography noted that the Del Mar bluffs eroded at nearly twice the average rate in six months. Should the rail line remain in place amid accelerated bluff erosion, a train full of passengers could tumble into the sea. Please protect lives, not property values. Please move the rail line off the bluffs.
8871	Jun 23, 2025, 02:43 PM	Thomas E Harrington	The Northern Yellow Line option seems clearly to be achievable and is the option favored by my wife and I.
8870	Jun 23, 2025, 02:15 PM	Joe Pallon	Greetings, As a regular rider on the LOSSAN corridor who has been affected by the recent service issues along San Clemente, I wish to share my support on this part of the larger effort to ensure that this corridor adapts to the new realities of climate change such as the rising sea levels that are eroding existing tracks along this route. In particular I favor the Crest Canyon Tunnel option the most but with the allocation of

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			overhead space to allow for possible overhead catenary wires in the event that the LOSSAN corridor decides to choose this option in the future. In addition, I believe that the Crest Canyon tunnel option will add to the overall trip time savings of Pacific Surfliner and Coaster rides, something that can be appreciated for riders of the second busiest passenger rail corridor in the country. Thank you for your time.
8868	Jun 23, 2025, 12:57 PM	Lisa Kravitz	Option 3 for a system with “90mph ROW, overhead catenary and high-level platforms will deliver faster trips than a 110mph ROW with diesel power and low-level boarding -- and probably by a lot” seems the slam dunk. To pretend sea level rise and storm surge is not going to fundamentally damage the Pacific rail line is fantasy thinking. Leaving “as is” should be abandoned to the dustbin. It is costly every time there is storm damage, and when the lines are shut people lose access to clean rapid transit and their jobs. Not everyone can afford a car/insurance/gas or even wants one.
8866	Jun 23, 2025, 12:25 PM	Brian Schalcosky	I'm writing to support the the Crest Canyon and Camino Del Mar alignment options. Preserving and improving the LOSSAN corridor is critical bringing the region's transportation system up to modern standards. I also support building the tunnel large enough to accommodate catenary for electric rail service. Overhead lines are a proven system for powering high speed, frequent rail service and leaving it out of the plan to save a small fraction of the total construction cost is just short sighted. It's hard to interpret a choice to exclude overhead lines as anything other than a deliberate choice to appease wealthy landowners along the corridor who do not like the aesthetics of catenary lines. SANDAG should be concerned about the level of service and long term functionality of the LOSSAN corridor, not politics.
8864	Jun 23, 2025, 10:54 AM	Greg Lippert	Hello, As a resident of Del Mar, I ask SANDAG to abandon plans to demolish 7-10 acres of land a block from the center of town to build a north portal (which would displace 35-50 families from their homes via eminent domain) in order to construct a tunnel for high-speed passenger and freight trains under the entire town of Del Mar. I also strongly oppose the plan to double track the eroding bluffs. This destruction to the already fragile bluffs which are eroding 6” annually will also take homes by eminent domain. Stop destroying our bluffs and beaches! I also request SANDAG abandon the Southern Portal proposal which would take 7-10 acres of land and will demolish homes and displace homeowners.

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			I unequivocally reject the idea of freight trains carrying toxic chemicals and other hazardous materials traveling under our town or any other densely populated areas in the region because of the increased risk of environmental catastrophe. I, therefore, urgently call for SANDAG to forward the "Yellow Line" alternative I-5 alignment option proposed by the Coalition for Safer Trains. This option offer will improve public safety, protect the coastal environment, and will be far less destructive to the people, homes and businesses in Del Mar. Sincerely, Greg Lippert
8857	Jun 22, 2025, 04:26 PM	Barbara Johansen	There is only one route that Del Mar Residents want to preserve our beautiful community..and that is the yellow line route to the 5 Freeway! Please honor the residents of Del Mar by only agreeing to this one route for generations to come. No tunnels!! Thank You!
8856	Jun 22, 2025, 04:25 PM	Amy Wood	I support the fast Canyon Creat alignment. We should be doing everything possible to expand train usage in our area, and this is the best plan to move forward safely and quickly.
8854	Jun 22, 2025, 04:13 PM	Jan and Dave Ulrey	Subject: Study the Northern Yellow Line If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The proposed Northern Yellow Line route offers the following advantages. It: 1) Has no negative impact on ANY homes or businesses 2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon 3) Has no negative impact on the City of Solana Beach

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			4) Places no portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes 5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families. 6) Eliminates expensive tunnels under private property and below sea level 7) Includes the Fairgrounds special events platform as planned 8) Allows Riverpath Del Mar to be completed as planned, which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon To us, this is a no-thinker! Thank you, Jan and Dave Ulrey
8842	Jun 21, 2025, 03:47 PM	Julie Korsmeyer	Please add the Northern Yellow Line to your review. It does not require a tunnel or portals. It does not destroy businesses and homes. It saves the lagoon and the canyon from serious negative environmental consequences. I am a 40 year resident of Del Mar and your 4 potential rail lines would all impact our town in disasterous and catastrophic ways that can never be justified.
8841	Jun 21, 2025, 02:30 PM	Don and Sue Instone	What are you people thinking? The four lines that you propose, which does not include the yellow line, which is the one you should be looking at the strongest, all rely on eminent domain, the closure of the businesses in Del Mar, years of construction, noise, road closures, etc. would be devastating to our small community. Just pretend you are a homeowner in one of these areas that will be taken by eminent domain. Think how you would feel if you were a business owner and had to shut down your business while construction took place several years. Think if you're a resident of Del Mar and how this disruption affects your world, your livelihood and your Home values. Put yourselves in our position and see how you feel about moving forward with these for destructive and senseless alternatives. Easy for you to say that this will save so much money, when in fact. Sand egg, it has been proven, waste so much of the interest funds that they receive through fraud and corruption and miss use of taxpayer dollars. So for you to claim now you're looking after taxpayer money seems pretty absurd.

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8830	Jun 21, 2025, 10:37 AM	Bill Carpenter	We support the "Northern Yellow Line" and the NO BUILD option in the NOP. Both protect homes and businesses. And funding for a tunnel probably won't come through.
8802	Jun 20, 2025, 07:08 PM	Jonathan Leo	I'd rank the Alternatives in this order: 1) Under Camino Del Mar 2) Under Crest Canyon Alignment 3) Delmar Bluffs Double Track I would recommend Under Camino del mar, since it'll offer the best value for money. It'll achieve speeds of 90 MPH which is the top rated speed currently anyway for the entire LOSSAN corridor and costs the second least out of the 4 alternatives. Putting it under Camino Del Mar may also help with less need for residential easements. The second recommendation would be under crest canyon. It's more expensive and doesn't avoid as many residential easements, but the speed is ideal for helping bring the LOSSAN corridor up to 110 MPH, substantially increasing commuter and regional/inter-city rail viability. If none work or meet huge resistance, double-tracking the bluffs will also be good value for money since it will still increase capacity and help stabilize the corridor and it costs the least by far. My only issue with that one is that we'll probably have to revisit all of this again in 50 years or so, it just kicks the can down the road.
8743	Jun 18, 2025, 08:34 PM	Peter Salmon	Please move forward with the Crest Canyon tunnel (Alt 4) and make sure it’s built for the future. This project costs billions. We should be getting faster, more reliable trains out of it. The Del Mar bluffs are falling apart, and we can’t keep risking shutdowns. Crest Canyon avoids sensitive habitat and allows for 110 mph trains, cutting trips from Oceanside to San Diego to under 30 minutes. Also, leave room for overhead wires (catenary) in the tunnel. We’ll need electric trains to run faster and cleaner. Hydrogen is risky in tunnels. Don’t design this in a way that blocks electrification just because of Coastal Commission staff’s opinions. Catenary is not in conflict with the Coastal Act. No-build and bluff reinforcement options are a waste of time and money. Let’s build something that works long-term.
8742	Jun 18, 2025, 11:08 AM	Peter Rosenbaum	I support the canyon crest alignment. This is an important rail corridor to me and others and it should not be slowed by crumpling bluffs or slow tunnels. Furthermore the tunnels should have space for catenary should the corridor be electrified in the future. A corridor like this will eventually be electrified and we should be ready

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8740	Jun 18, 2025, 08:42 AM	Kevin Napolitano	After reviewing the presentations and comments, I continue to support the alignment that will result in the lowest travel time because more people will use the train as travel time decreases. I hope that space is set aside to electrify the tracks in the future.
8739	Jun 17, 2025, 09:14 PM	Elijah Sauder	To whom it may concern, As a young public transit using, northern San Diego county resident, I wanted to offer my appreciation of the work you have been doing on the LOSSAN (among other projects). In regards to the proposed alignments, I have very few qualms with either the blue or purple alignment -- preferring the purple as it seems to be a simpler alignment. I recognize the yellow line as a feasible option, however I fear the slow down caused by the two turns would lead to an undesirable increase in travel times. Out of all of the options the green alignment is the only one I believe should not be considered -- unless the plan is modified to include driving pylons to bedrock to support an elevated section over the beach and bluffs. I look forward to the improvements and safety, longevity, and throughput that this project will bring. Looking forward to improvements, Elijah Sauder
8727	Jun 17, 2025, 05:28 PM	Jesse Shoghi	Anyone who thinks that allowing even more of our critical rail infrastructure to fall apart or be removed is acting against Americans best interests. Please, for the survival of our state, ignore the anti-American NIMBYS who don't want to allow this rail line to continue.
8725	Jun 17, 2025, 04:35 PM	Tom Grindle	Please remove the tracks from the existing bluff location. The bluffs are continuing to erode and any efforts to protect them will ultimately be unsuccessful. An example is the past (several years ago) collapse of the sea wall north of Anderson canyon. In addition, any additional sea walls that would have to constructed to protect the bluff top tracks will irreparably destroy over one and a half miles of sandy beach.
8724	Jun 17, 2025, 03:59 PM	ZEA BOROK	I am strongly opposed to the Camino Del Mar and Crest Canyon options because of possible impacts on property values as well as noise concerns. The most feasible is the Racetrack option. Simply reinforcing teh bluffs may be a short-term solution but in the long-term the line will need to be moved. The latter option simply kicks the can down the road.
8723	Jun 17, 2025, 03:16 PM	Andrei Thompson	The LOSSAN Corridor is the second most used corridor in the country when it actually can have trains running on it regularly. It is a critical tool in our toolbox to fight global warming,

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			mitigate environmental impact, support equitable living in our society, and relieve traffic on our freeways. If we allow a small group of people to oppose something so important to all people living in Southern California, it won't just be us paying for it, but generations to come. That is why we must go with Camino Del Mar Tunnel or Crest Canyon Tunnel. We must leave room for catenary when boring the tunnel. We must plan for the LOSSAN to be electrified when making these planning decisions, or it will be impossible to do so in the future. Electrification via catenary is the best tried and true technology with the least environmental impact in the long term. It is the reason why all world class modern train systems like Japan and Spain use it for their trains. The tunnel will cost very much, but the cost will be so much greater if it gets constructed without room for catenary. We can't afford to do this the wrong way. Electrification via catenary does not conflict with the Coastal Act. The Coastal Commission staff saying otherwise are wrong. It is unacceptable to go for the status quo and to do nothing but bluff retrofitting. Tunneling is the best combination of speed and longevity for the system with minimal environmental impact. We need to make sure we are protecting things for all people. Those with disabilities, kids, seniors, tourists and just anyone who doesn't feel like driving deserves to have an easy and fast means of transportation in Southern California. More people on the train means fewer people congesting our freeways. Freight trains use this corridor and keep so many semi trucks off the road. More and reliable passenger trains means that locals who need to take a car trip can more easily use the I-5 and not sit in traffic. This helps save time and cut down on greenhouse gasses for everyone. Trains and mass transit is the best way to get this done. I personally use the train whenever I can to go visit the LA area. When it works right, it works very well. When it isn't working well, I can see how obviously society is devoting resources away from things that don't help all people. Please think of all people and not just the few and the able when considering this issue. If we keep making decisions in favor of the few who already have everything, everyone be left with nothing.
8720	Jun 17, 2025, 02:21 PM	WILLIAM KOSINSKI	This study needs to consider catenary and generally analyze the possibility of future electrification. This is a once-in-a-lifetime investment into critical infrastructure that serves people all over Southern California; the EIR needs to plan for the next few generations of Californians.

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8718	Jun 17, 2025, 12:13 PM	Matthew MacDonald	I support the two options that will future proof our system for decades to come. We must only consider options that are double tracked, tunneled, and LEAVE ROOM FOR ELECTRIFICATION AND CATENARY SYSTEMS. WE MUST NOT PRECLUDE CATENARY FROM THE DEIR. Catenary is the only system that allows for the headways and level of service planned for expansion of this route to four trains per hour. Are you abandoning this plan? Are we ignoring catenary in order to make an argument against tunneling? If catenary is not considered then hydrogen is the only “clean” option. But hydrogen has significant fueling costs and creates large safety concerns for tunneling? Are we sabotaging tunneled alternatives? Do you have a plan to mitigate the fire hazards caused by hydrogen in tunnels? Catenary is NOT in conflict with the Coastal Act. I OPPOSE the no build and reinforce ROW options. We need these tunnels! I support high speed, double tracked options: a) Crest Canyon (4), b) Camino Del Mar (3) Support 110 mph design speed for Crest Canyon alignment Crest Canyon alignment has the least impact on sensitive habitat. Reinforce existing ROW and Camino Del Mar options impact the Los Penaquitos Lagoon, while the I-5 alignment may impact the San Dieguito Lagoon.
8715	Jun 17, 2025, 09:30 AM	Matthew Highland	Please choose the Camino Del Mar alignment option. The tracks need to be taken off the bluffs, and this is the cheapest and fastest option of the ones that do that. In addition to the construction benefits, the route is the most direct and should result in the best service quality once completed. The other routes will be more expensive and take longer to become operational.
8714	Jun 17, 2025, 09:12 AM	Alex Graff	My name is Alex, and I'm a resident of San Diego writing to provide my support for two tunnel options for the LOSSAN rail alignment project - Crest Canyon Tunnel or Camino Del Mar Tunnel. The LOSSAN corridor is San Diego's only rail connection to the entire rest of the country for both passenger and freight service. Hamstringing this line by letting the tracks collapse into the ocean or by applying expensive and temporary fixes will serve to hinder the region's growth and may even hurt our economy overall. The only reasonable option for a project of this scale is one that chooses to meaningfully improve service.

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			Keeping the existing ROW, even for "reinforcements", will only kick the can down the road to future leaders who will have to take up the same question and spend more billions to fix the tracks again. Furthermore, the existing ROW is insufficient for today's needs, let alone the needs of a growing population in the region. A top speed of 55 mph doesn't even compete with freeway traffic. Not taking steps to speed up rail service on this corridor will forever curse the corridor with worsening traffic until we have LA-level gridlock throughout the day. At a minimum, all rail projects moving forward should operate under the assumption that electrification is the end goal. Electric trains through Crest Canyon Tunnel or Camino Del Mar Tunnel, with future top speeds of 110 mph, would provide 30 minute service between San Diego and Oceanside. That's nearly a 50% reduction in travel time compared to the current Amtrak route! As a regular rider of the Surfliner to LA, I would greatly appreciate the ~17% reduction in travel time through LOSSAN to LA Union Station! Please consider the actual needs of the overall region and build a double track tunnel with room for catenary for electric rail. These two tunnel options are the only ones worth considering for a key link in the San Diego region's transportation network. Please do not let shortsighted residents claim constructing modern rail infrastructure is "bad for the environment". Climate change-induced corrosion of the bluffs is a direct result of carbon pollution from heavy and increasing car travel through this region. Failure to provide a realistic alternative to driving, and especially letting the LOSSAN corridor close, is the real environmental concern for this project. Modern, electric rail infrastructure in the long term will more than offset any misguided "environmental" concerns about the temporary construction of said infrastructure I urge you to not let the minuscule population of a wealthy town like Del Mar affect the livelihoods of the millions of annual riders that take the train along the LOSSAN corridor, or the possibly billions of dollars of goods that travel by freight. Thank you for your time, Alex Graff
8713	Jun 17, 2025, 08:20 AM	Jacqueline Harris	The Crest Canyon option seems like the most viable long term while also being less obtrusive than other routes. We need reliable rail options!
8712	Jun 17, 2025, 02:34 AM	Erin Hoops	I support the Crest Canyon alignment. As a resident of Long Beach, I would switch from driving to train to get to San Diego if the trips were faster and more reliable. The Surfliner is great, but line closures due to erosion makes it less usable for me and my family.

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8711	Jun 17, 2025, 01:01 AM	Marcel Sereboff	I think it is vital to ensure the reliability and speed of our state's passenger rail network. I support the Crest Canyon Allignment to ensure maximum speeds for a highly trafficked rail corridor.
8710	Jun 17, 2025, 12:50 AM	Trevor J Cappa	The tunnel should be built with either the Crest Canyon or Camino Del Mar tunnel options with room for electrification. There is no reason not to build a robust and future proof rail system and either a no build or a reinforcement of the existing Right of Way would be a terrible waste of an opportunity to provide the corridor with first class rail!
8709	Jun 16, 2025, 10:55 PM	Arthur Dutra	I am massively in favor of either the Crest Canyon or Camino Del Mar routing for this critical project, as both of these will solve the coastal erosion issue and maintain minimum 90 mph design speeds. But more importantly, I urge you to support the Crest Canyon routing with a 110 mph design speed, and a tunnel bore large enough to leave room for overhead catenary in the future. Electrifying the Surfliner, and double tracking the entire routing to enable 30 minute headways, would be one of the most transformational transportation projects in California. This would massively boost the future usability of this important rail corridor, would speed up passenger service, reduce noise and emissions with a safe and proven and reliable overhead catenary technology, and would also enable Merrolonk and Coaster to also electrify their trains on this corridor and improve their service speed, headways, and thus usability to Californians.
8707	Jun 16, 2025, 10:12 PM	Addison Luria-Roberson	Hello SANDAG, I'm writing to support the higher speed Crest Canyon and Camino Del Mar alignments. These two options will provide the highest quality service for the longest amount of time (the bluffs won't last forever even if reinforced and I would love for the beaches to be safer to access once trains are underground). Please leave room for double tracking and electrification. I grew up in San Diego and went to college at UCSB. The surfliner was the only way for me to travel but it was slow and almost every trip was delayed. Electrification will allow higher frequencies and faster trips as well as support high speed rail eventually. I would rather we spend the money today while it's cheaper so that the next generation doesn't need to build a new tunnel once it's time to finally electrify all passenger rail. Please choose the option that will provide the best service, now and for generations from now.
8706	Jun 16, 2025, 09:17 PM	Oliver Silverio	Please realign the tracks away from the cliffs and build the tunnel under crest canyon to preserve and expand the second biggest rail corridor in the united states for the future.

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			Additionally please leave room in the tunnels for overhead catenary to allow for future, green electric trains
8705	Jun 16, 2025, 08:03 PM	Colin Warn	Hi there. Writing today to voice my opposition to the No build and Reinforce ROW options. I'd also like to voice my support for the high speed, double tracked options: a) Crest Canyon (4), b) Camino Del Mar (3) Support 110 mph design speed for Crest Canyon alignment.
8704	Jun 16, 2025, 07:45 PM	Hillary Hueter	If we want to continue to make LA to SD a viable rail network, then it's beyond time to reconsider going along the Del Mar Bluffs. Repairing and Re-enforcing is not working anymore. I support either under Crest Canyon or Camino Del Mar, with a preference for Camino Del Mar due to the potential higher speeds.
8703	Jun 16, 2025, 07:32 PM	Nicolas Hasbun	I write in support of the Crest Canyon tunnel alignment. The LOSSAN train corridor is one of the busiest passenger rail corridors in the US, and we must ensure that this corridor has the necessary infrastructure to allow high-quality, frequent, environmentally-friendly public transportation options both today and tomorrow. A double-tracked alignment that allows high speeds like that of Crest Canyon fulfills those crucial goals. Furthermore, I urge that the Crest Canyon alignment is designed to allow for catenary systems and the electrification of the LOSSAN corridor. Electrified rail is a proven public transportation technology that is efficient, and selecting the Crest Canyon alignment without designing for such technology would be an incredibly short-sighted decision. Thank you.
8702	Jun 16, 2025, 05:56 PM	Juan Carlos Mauricia	Everyone is focused on moving the train track (including lawmakers), but no one is focused on building a better train/train track. Perhaps the solution is the same view (which passengers love) but a better train…one that doesn't risk falling into the ocean.
8701	Jun 16, 2025, 05:17 PM	Nathan Hornbuckle	Tunnel clearances and design must be future-proofed to accommodate electrification, including sufficient room for catenary systems. This tunnel project, which will cost billions, should be planned with the long-term vision of the Surfliner and Coaster services in mind, both of which anticipate up to four trains per hour through this section—an operational frequency that economically supports catenary electrification. The exclusion of catenary infrastructure from the Draft Environmental Impact Report (DEIR) raises critical questions: does this omission signal that NCTD and the Surfliner are abandoning this level of service? Furthermore, by leaving catenary out of the DEIR scope, is the agency deferring key decisions about motive power to a later stage—specifically those involving hydrogen propulsion, which would necessitate substantial fueling and safety infrastructure? If hydrogen is being considered, does the agency have a credible plan to mitigate the heightened fire hazards hydrogen poses in tunnels? It must be stated unequivocally that catenary is not in conflict with the California Coastal Act, despite the position taken by the

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			Coastal Commission staff. We strongly oppose the "No Build" option and emphasize the need to reinforce and retain the rail right-of-way; these tunnels are essential. We support high-speed, double-tracked alignments through Crest Canyon (Option 4) and Camino Del Mar (Option 3), and specifically advocate for a 110 mph design speed for the Crest Canyon alignment. Notably, the Crest Canyon alignment also has the least environmental impact on sensitive habitat. In contrast, reinforcing the existing right-of-way or selecting the Camino Del Mar alignment would affect the Los Peñasquitos Lagoon, while an I-5 alignment risks damaging the San Dieguito Lagoon.
8699	Jun 16, 2025, 11:40 AM	Daniel Halmos	My name is Daniel Halmos and I am a graduate student at UCSD currently residing in Clairemont. Frequent traffic jams between San Diego and LA and a need to get to LA on the cheap make the Surfliner and Coaster a lifeline for me and millions of others in the area, and potentially millions more if the right choices are made to make this ride faster and more competetive against driving. It is for this reason that I strongly oppose the no build option, oppose the reinforced ROW option which does nothing to prevent long term loss of the ROW, and emphatically support the Crest Canyon alignment which does the most to capitalize on the billions of dollars of investment already put into the LOSSAN corridor to make our trains faster.
8697	Jun 16, 2025, 10:38 AM	Michael Nascenzi	Hello, I'm an Encinitas resident and use the train frequently. I live within 100 yards of the tracks in Leucadia. I support the Crest Canyon alignment as the best way to continue and improve the second most important rail corridor in the country. Sincerely, Michael Nascenzi
8693	Jun 15, 2025, 07:35 AM	L. Robins	Please achieve all of your own Regional Plan goals by: 1. Respond to climate change of rising seas and crumbling cliffs: ***Missing Alternatives to your EIR: A. Northern Yellow Line to get the track off the Del Mar Bluffs: B. Take the Trains inland to I-5 and I-15. • Use new I-5 park and ride lots for new stations. • Make Oceanside Amtrak's last stop on the coast. • Route the freight and Amtrak inland along the existing freight-capable Sprinter track. • Build a 17-mile connector from Escondido to Mira Mar Hill along I-15 to connect with the existing LOSSAN tracks. 2. Safety:

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			Eliminate at-grade dangerous track crossings where emergency vehicles, cars, people and trains create confusion and slow everyone down. Take the trains inland. 3. Reduce VMT: Have quick, inexpensive flexible fleets to major destinations and the airport. Reconnect east and west with efficient transit. (take train inland) 4. Environment: Get the tracks out of lagoons and re-engineer the trains to be Electric. Take the trains inland.
8692	Jun 15, 2025, 07:08 AM	William Scott	Please don't spend money and time on the Racetrack View Drive Option when it should have ZERO chance of meeting environmental or public standards. It is absolutely nuts to considered such a blight that would clearly ruin so much wetlands and homes. Just stop. Put the line under Camino Del Mar. Figure out how to create a London Tube Sized Pedestrian Portal at 15th Street and be a winning organization.
8691	Jun 14, 2025, 05:03 PM	Jay Steiger	While it is understandable that some residents near the tracks may prefer more beach walls, but this approach puts off the inevitable, a realignment of the tracks off the most vulnerable coastal area. This rail line is a part of national defense, commerce, and passenger transport. It cannot be allowed to risk collapse due to resistance from a few. Build the tunnel under Camino Del Mar or reroute to I5. Thank you.
8690	Jun 14, 2025, 08:18 AM	Joseph M Calabro	As SANDAG is moving forward with the LOSSAN Rail Realignment Project, we are now at a critical junction in this process. The main concern is that the Camino Del Mar and Crest Canyon High Speed alignments route the train, carrying hazardous materials, into and through residential neighborhoods. If SANDAG is truly representing the people in their communities, they will select the SAFEST ROUTE for the freight train to travel through our region. Moving the tracks to a tunnel under homes only trades one dangerous train track for another. If this tunnel is built, BNSF Railroad will be carrying hazardous materials and toxic chemicals directly under Del Mar and San Diego residential neighborhoods, including homes, businesses, infrastructure and public recreational spaces. There is a safer alternative. The Northern Yellow Linet to the I-5 is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, we are requesting that the portals are located away from homes and that the tracks are routed via the Northern Yellow Line east to the I-5.
8689	Jun 14, 2025, 08:16 AM	JoAnne E Gervase	As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the

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			people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.
8688	Jun 14, 2025, 08:04 AM	Michael P. McLoughlin	Needlessly tunneling under ANY city is a BAD IDEA! The safest, least expensive and least invasive option is the YELLOW LINE. The other three options will cripple our city, cost a fortune, destroy property values, and end up in a legal fight that will last for years. SANDAG should be working WITH the people, and listening to their concerns. This entire project reeks with high risk, high cost overruns, and high (needless) destruction of properties. Haven't our government agencies learned ANYTHING from the "Bullet-Train" project. Keep it simple, choose the least expensive/invasive alternative, and get it done on-time. Please choose the Yellow Line as the best alternative. Thank you.
8686	Jun 13, 2025, 05:37 PM	Eric From	I support another alternative "The Northern Yellow LIne". This alternative runs the track along the 5 northward till it clears the San Dieguito Lagoon and then winds west along Fairgrounds property till it rejoins the existing track. As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line (not the one shown on the map on this page) is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that at he Northern Yellow Line alignment remains in consideration.
8685	Jun 13, 2025, 03:50 PM	Hany Massarany	Our concern is that the Camino Del Mar and Crest Canyon High Speed alignments route the train, carrying hazardous materials, into and through residential neighborhoods. If SANDAG

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			is truly representing the people in their communities, they will select the SAFEST ROUTE for the freight train to travel through our region. Moving the tracks to a tunnel under homes only trades one dangerous train track for another. If this tunnel is built, BNSF Railroad will be carrying hazardous materials and toxic chemicals directly under Del Mar and San Diego residential neighborhoods, including homes, businesses, infrastructure and public recreational spaces. There is a safer alternative. The Northern Yellow Linet to the I-5 is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, we are requesting that the portals are located away from homes and that the tracks are routed via the Northern Yellow Line east to the I-5.
8680	Jun 13, 2025, 12:44 PM	Mara Bickett	Please seriously study and consider the Northern Yellow Line option , (to the north of the San Dieguito Lagoon) for track realignment through Del Mar. This option is the most logical and will be the least disruptive to our north county and Del Mar community. The tracks belong on the major transportation corridor, Not under our city or neighborhood.
8675	Jun 13, 2025, 11:39 AM	Susan S Wagner	As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration. Susan S. Wagner [redacted] Del Mar, CA
8668	Jun 13, 2025, 10:31 AM	Pam Laidlaw	The Northern Yellow line is the ONLY solution as its lack of impact to the city of Del Mar home and businesses. As a very longtime resident of Del Mar plus a business owner I have been following closely as the different options have been put forward examined . We have THE perfect answer ; let's make it a reality .That is the Northern Yellow Line . Thank you , Dr. Pam Laidlaw
8667	Jun 13, 2025, 10:30 AM	Karin Carey	It is imperative for the interests of all San Diego that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Yellow and Northern Yellow Line are the most acceptable routes for the double-

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			track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that these alignments remain in consideration.
8666	Jun 13, 2025, 09:58 AM	Kevin Whaley	The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration.
8665	Jun 13, 2025, 09:32 AM	joe potocki	Dear SANDAG members: As SANDAG moves forward with the LOSSAN Rail Realignment Project, it should- if is is truly representing the people of San Diego- select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train.This route will be the least impactful, the safest,avoid destruction of property and litigation, benefit the fairgrounds and have the least environmental impact compared to the other routes under consideration As SANDAG is still evaluating alignments, it's imperative that the Northern Yellow Line alignment remains in consideration. Thank you for consideration of our comments and position.Joe
8664	Jun 13, 2025, 09:26 AM	Hershell Price	NORTHERN YELLOW LINE ALIGNMENT As SANDAG moves forward with the LOSSAN Rail Realignment Project, we acknowledge that the train track will be moved to a safer location. If SANDAG is truly representing the people of San Diego, they will select the LEAST IMPACTFUL ROUTE for the freight train to travel through our region. The train can be routed east to the Interstate 5 keeping it in a transportation corridor, rather than into established neighborhoods. It is imperative for the interests of all San Diegans that the Northern Yellow Line alignment BE INCLUDED EQUALLY for study, with any other alternatives. The Northern Yellow Line is the most acceptable route for the double-track high speed commuter and freight train. As SANDAG is still evaluating alignments, it's imperative that athe Northern Yellow Line alignment remains in consideration. Hershell Price, Del Mar Resident
8663	Jun 13, 2025, 09:22 AM	lawrence lare	I support the northern yellow line option. This will eliminate the need to take peoples homes and put the railroad in dangerous proximity with people and their homes. Lawrence Lare

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8651	Jun 12, 2025, 11:21 AM	Ted Mudge	I believe in and would support invoking eminent domain acquisition of properties adjacent to the current track routing along the bluffs. I think that it would be cheaper, easier, safer and far quicker than any tunneling proposal. Eminent domain has long been used in California to improve public transportation. Del Mar is no more sacrosanct than any of the other locales that have experienced the process.
8649	Jun 12, 2025, 02:47 AM	Kimberly Hiland Belding	You've made good progress on the yellow "tunnel under the 5" option. I would like to see the removal of more of these other options that would weaken the sandstone cliffs, rather than just adding the appearance of things the community wants and then doing what you want, anyway. We all know the green option isn't viable. You need to mark the tunnel vents on the map for full transparency.
8648	Jun 11, 2025, 06:06 PM	Chris Margraf	Please build the alternative which allows the highest speed for trains. It seems that the Crest Canyon alignment will provide this. Please avoid any alignment which uses the existing Del Mar Bluffs, as this alignment is very prone to damage from climate change. Please ignore any comments from wealthy Del Mar residents about tunneling. These comments are unfounded and the tunnel is necessary to ensure the future success of this vital rail corridor.
8647	Jun 11, 2025, 05:44 PM	Dereck Tatman	I strongly support the Under CC Alternative alignment. The bluff solution is terrible, as it completely breaks access to the beach. The I-5 alignment is needlessly long and out of the way. Camino del mar could be second choice, but really the best choice by far is the CC alternative
8643	Jun 10, 2025, 08:17 AM	Russell Matthews	I'd like to retract my recently submitted comments lol I misunderstood the map and see now the yellow path had the largest tunnel. I think the pink line is best if it's able to utilize a good amount of existing track and it's a short tunnel.
8642	Jun 10, 2025, 08:15 AM	Russell Matthews	As much as I love the scenery of the bluffs portion of the railway, it will eventually be gone or have to become a bridge anyways. I think the yellow line that follows the 5 seems like it would make the most sense and be the least intrusive to people. I imagine tunnels are quite expensive and there would be issues with trespassers with larger tunnels.
8640	Jun 09, 2025, 05:08 PM	Ann Benda	Has anyone considered building the rail route using a bridge over the ocean past the vulnerable area? I envision the highway similar to going to Key West, FL. Seems like a route over the ocean would be a lot less disruptive and would add to the attraction of an ocean view rail route.
8629	Jun 08, 2025, 03:25 PM	Carla Altheide	I feel the San Dieguito Bridge looks like the least disruptive to the least number of people, and perhaps the easiest.
8628	Jun 08, 2025, 11:11 AM	Claudia Prilliman	I live just east of the 5 and north of the 56; adding a rail train to this already congested area will only increase noise and air pollution in this area. Please strongly consider the tunneling options to avoid added burden to residents in this area and preserve our property values.

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8626	Jun 07, 2025, 10:49 PM	Gregory Isaac	For the long term reliability of the line it is imperative that the route be moved off of the bluffs. And as long as we are making a strategic long term investment, it only makes sense to make the best investment possible. The alternative under Canyon crest will provide the best long term value in terms of reliability and travel times.
8625	Jun 07, 2025, 09:09 PM	Jack Mann	The route under Crest Canyon appears to be the best option. It will cut down rail travel time and will hopefully set a precedent for a tunnel under Miramar, which would supercharge ridership, which would reduce travel times even further (and supercharge ridership). I'm concerned about the alternative options requiring bridges, which are structurally more precarious, especially given the poor soil formations in coastal San Diego. I'd also be concerned that bridge-based routes would expose the project to more criticism from NIMBYs since it would be visible/audible on the surface.
8624	Jun 07, 2025, 02:26 PM	Nina Jackson	I believe that the I5 alignment is the best option, as it will impact the least number of residences, during construction, and after the build with vibrations. I am also very concerned about SANDAG enforcing the policy to keep nighttime lights out of the neighboring homes during construction , keeping within published work hours, and limiting the noise to the correct decibel level. These policies were not followed during the last LOSSAN construction project at the Bridge at Torrey pines.
8623	Jun 07, 2025, 12:37 PM	Aidan Wadsworth	I think the route under Camino Del Mar (shown in purple) is the most logical. Reinforcing the bluffs adversely affects the beach sand and will eventually erode away. The blue route tunnels under two nature preserves and would have harmful impacts to them. Throughout along I-5 is a longer and more expensive alignment with multiple turns that will slow down travel time. The route under Camino Del Mar is the best because it has a shorter tunnel that will be quicker and cheaper to create and should have the least environmental impact.
8620	Jun 06, 2025, 04:42 PM	Lydia Tucker-Clark	Please consider moving the LOSSAN Rail Corridor to Highway 15, with east to west lines for coastal stations. This will move the rail line inland enough to prevent the natural hazards of building too close to the coast. Thank you, Lydia Tucker-Clark
8617	Jun 06, 2025, 01:26 PM	Frank Rivera	Stay with the coast route. You had a chance to put in on Hwy 5 during the expansion. That opportunity was lost. Underground route too expensive
8616	Jun 06, 2025, 12:53 PM	Byron Cohea	I support the design known as "Del Mar Bluffs Double Track Reinforced Alternative Alignment". The train tracks passing near the coast are a highlight of the ride. Secondly, SANDAG should be more forceful in implementing a plan. The whims of a small community are deleteriously affecting the mobility and prosperity of the region, as thousands of people and millions of dollars of cargo pass that LOSSAN corridor every week. Thank you!

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8615	Jun 06, 2025, 12:06 PM	Mark Baysinger	As a train rider, I support reliable, fast, and clean rail transport, and that's why the following priorities are extremely important: 1) Move the tracks off the crumbling bluffs 2) Realign the tracks for 110MPH (or better) operation. 3) For tunnels, choose a bore size that's large enough for OCS (overhead contact system) electrification, the gold standard for fast, clean trains. Additionally, we should take the opportunity to get the rails out of Penasquitos Lagoon. Sincerely, Mark Baysinger San Diego, CA
8614	Jun 05, 2025, 09:12 PM	Robert Kovelman	I strongly favor the proposed alignment under Camino del Mar. This alignment has the shortest tunnel, is the most direct, and is therefore likely to be the fastest for the trains. My second priority would be the Canyon Crest alignment. There is no good rationale for the I-5/San Dieguito Bridge alignment. Thank you.
8612	Jun 05, 2025, 06:57 PM	KL	Crest Canyon would be flat out dumb and whoever suggested that needs to go on a walk to reevaluate their lives. All other options are whatever. Yellow line option would be boring along the 5 though.
8609	Jun 05, 2025, 02:45 PM	Peter Glaser	The yellow route seems to alleviate most of the fears of the Del Mar residents(not all). So here is some food for though; With the new bridge and platform on the Fairgrounds and the Yellow route causing the trains to slow down there, why not work the the Fairgrounds to make their platform the regular train stop instead of Solana beach. This would eliminate the slow down, because all passenger trains would be stopping there and not in SB. This could be a part of the Fairgrounds new master plan that they are working on. I am impressed with the work SANDAG is doing on this project.
8608	Jun 05, 2025, 02:29 PM	Judith Verbanets	Most direct, and least expensive, without affecting a significant amount of property are 1) existing route or 2) under Camino Del Mar. These routes provide a straight line which allows for increased speed and improved safety.
8607	Jun 05, 2025, 12:46 PM	B H	Doing Del Mar Bluffs Alternative Alignment is an ineffective solution. It is a short term band aid and does nothing to stop the long term problem. SANDAG should do the least

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			expensive of the other 3 alignments, enduring the problem is fixed but is also not wasting taxpayer money.
8603	Jun 05, 2025, 09:36 AM	Paul Motschall	By far the best choice for taxpayers would be to keep the existing corridor, stabilize the bluff and shift tracks slightly inland. This would of course require the purchase of some of the property to maximize the impact of this effort, but even paying premium rates for homes the savings would be substantial and the remaining home owners would enjoy piece of mind that the cliffs would be protected from further erosion going forward. Sea level rise is going to make action imperative so engineering this solution immediately seems prudent. The only other reasonable solution is the Camino Del Mar tunnel, though the bluffs will still need stabilization if property owners along the current alignment are going to continue to enjoy their homes.
8600	Jun 05, 2025, 06:15 AM	William Trogler	As a Del Mar resident it is clear that the least expensive and practical option is to maintain the tracks on their current location by reinforcing the cliffs with a sea wall, as is done in many places around the world. Recently it came to light that the defense department requires that the present tracks be maintained and a tunnel would not suffice, so why have a second alignment. Furthermore, the double tracking for a new Fairground stop at the west side of the Del Mar fairgrounds only lines up well with the location of the existing tracks or a tunnel under Camino Del Mar. If the existing tracks need to be kept anyway for DoD use, then do the common sense option and reinforce the bluffs so the present alignment works. Save the hundreds of millions being spent on studies for alternative alignments and start work now. A bonus would be the safety of county residents who visit the beach and lie beneath the eroding cliffs.
8598	Jun 04, 2025, 11:11 PM	David Pierce	1) The new reinforce-the-bluff option will not work long-term. You can't hold back an ocean forever. 2) Please, please, PLEASE don't value-engineer away wider tunnels. If they are too narrow, there will be no room for catenary wire, the world standard for train electrification. Battery trains are too heavy and slow, and more of them are needed to provide service while the rest are stuck charging in the middle of the day. Slower trains means fewer riders, and more trains for a given service level means higher operating costs. Hydrogen trains are also heavy and slow, and longer due to tugging around a huge hydrogen tank. Hydrogen trains are too expensive: the only hydrogen passenger train in the world, in the German state of Baden-Württemberg, had to be shut down due to 80%

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			higher operating costs compared to electric trains. ("'Will no longer be considered' | Hydrogen trains up to 80% more expensive than electric options, German state finds" by Leigh Collins, hydrogeninsight.com, October 20, 2022). Finally, hydrogen itself is a greenhouse gas if it escapes into the atmosphere. Hydrogen pipelines are much leakier than natural gas pipelines, as hydrogen molecules are much smaller than methane. The most economical source of hydrogen is the burning of natural gas, which releases carbon dioxide. The "green" sources are much more expensive. Unless SANDAG is willing to pay even higher operating costs, hydrogen trains will produce greenhouse gases. Slower, more expensive service equals fewer passengers. Please spend a bit more money to make the train service electrified with overhead wire in the long term!
8591	Jun 04, 2025, 06:11 PM	Ari Stassinopoulos	I believe that the Under Camino Del Mar Alternative Alignment will be the most effective for rail service, minimizing travel time and providing for possible future service expansion in a way that is not possible for the other tunneled alternatives. It additionally would allow continued use of the alignment that has already been constructed through the Los Peñasquitos Lagoon area. A reinforced double-track on the bluffs will be both more disruptive and more likely to continue experiencing failures. The Racetrack View Drive alignment is only a gimme for the wealthy residents of Del Mar who believe they can bully SANDAG into providing worse service for everyone else in the county so they can have a slightly lower perceived level of noise.
8589	Jun 04, 2025, 05:27 PM	Arne Lillehamer	Would think most economical and scenic route would be double tracking the current track. Basically sink piles and create a bridge like route close or on current land. Beach access paths could be run underneath.
8588	Jun 04, 2025, 04:58 PM	DONALD MOSIER	I am no longer on the board of the 22nd DAA, so my comments reflect only my views as a resident of Del Mar. I am opposed to the bluffs double tracking. It will just prolong the agony of sea level rise and bluff erosion, and will surely be rejected by the California Coastal Commission. Each of the three remaining options have pluses and minuses. The San Dieguito Drive to I-5 option has tight turns and negative impacts on the San Dieguito Lagoon. The Camino del Mar option has few impacts on Del Mar residences but major negative impacts on the Los Penaquitos lagoon. The under Crest Canyon alternative seems the best remaining option although residents in Del Mar are concerned about tunnels under their property and possible eminent domain taking of residences near the north portal. Some concerns are real, but many are being fed by misinformation and fearmongering. Attacking SANDAG has become a popular sport in Del Mar. I suggest more emphasis on this as a federal project important for our national security might move some people.

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8586	Jun 04, 2025, 04:19 PM	Alla Valdespino	I believe any rail alignment that gets the tracks off the bluffs and can deliver quality service in a timely manner is the best option. There needs to be a limit to how much the organization takes into account the interests of rich white elites over the needs of those who use rail and need this connection for work, school , and recreation. A wealthy few shouldn't overtake the needs of thousands of people. Tunnels are good but so are overpasses like the sky trains in China or Thailand. I hope the agency took a look at different world class rail configurations around the world and not the few poor examples in N. America.
8585	Jun 04, 2025, 04:00 PM	David Lynn Altheide	I favor the route San Dieguito Bridge to I-5 Alternative Alignment because it is the least disruptive, involves little or no tunneling, and follows an established corridor. I suspect that right of way issues would also be minimized. I am against any route that may be proposed that would to through or under Solana Beach business corridor and that would disrupt already established--and planned--rail routes.
8583	Jun 04, 2025, 03:23 PM	Joel K Dean	The I-5 route seems to be the best long term solution if the military's use of the existing rail line can be moved also.
8582	Jun 04, 2025, 02:29 PM	Jim M Benedict	The yellow line is the only option. Pink and Blue are non-starters for politicians that want to be re-elected. The green line is an open invitation for a train falling into the ocean
8581	Jun 04, 2025, 02:21 PM	Art Tenner	NONE! I do NOT support SANDAG spending any tax or bond money on railway improvements. If work is needed, it should be paid for by the railroads, AMTRAC & BSFS. If the railroads don’t see this work as a viable investment, they can abandon this route. We can’t afford to subsidize this work that offers very limited benefits.
8577	Jun 04, 2025, 01:54 PM	Meghan Lithgow	I would prefer to the San Dieguito Bridge to I-5 Alternative Alignment if a train stop could be provided at the south end of the Del Mar Fairgrounds. I am a weekly train rider from Carlsbad to Downtown and any alignment away from the cliffs would be preferable. It looks like the yellow alignment would have a minimal amount of tunneling and paralleling the I-5 would be advantageous with respect to the noise impact on residential communities.
8574	Jun 04, 2025, 01:08 PM	Brett Wilkins	As a rider, the alternative with the shortest travel time is preferred. It is also important to make sure that the new stations constructed have enhanced pedestrian access to the Del Mar fairgrounds entrance as this will likely be a main driver for seasonal ridership
8573	Jun 04, 2025, 01:05 PM	Kathryn McLane	The proposed alternative with a tunnel under Camino Del Mar appears to involve the least amount of new environmental disruption and uses existing track through Los Penasquitos Lagoon thus not necessitating a large amount of new track to be built to achieve the realignment.
8570	Jun 04, 2025, 12:29 PM	Stephen Stewart	SANDAG needs to get this plan finalized and in place ASAP. Seems there has been back tracking lately with not a reduction in options but an increase in options... going the wrong

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			direction. This is a critical corridor not only for the region but even for national security (DoD transportation). Keeping the tracks on the bluffs would be a major setback that doesn't address this inevitable problem of cliff erosion. Putting any more funds to lengthening the tracks on the bluffs is very short cited. I fully support the 'Under Camino Del Mar Alternative Alignment'. It is the most direction option with less environmental impact to the wetlands while moving the tracks off the bluffs. Please spend these precious funds wisely and get this critical national infrastructure fixed so it can be relied upon for many decades to come.
8569	Jun 04, 2025, 12:22 PM	Rick Paul	Of the 4 alignment choices, I prefer the green Del Mar option.
8568	Jun 04, 2025, 12:21 PM	Mary Lake	I think you should keep the track in its current location. If that is the double track reinforced alternative alignment, that is the option I vote for.
8566	Jun 04, 2025, 12:15 PM	Charles Daniel	Any alternative over the "No project" alternative is preferable. Erosion on the bluffs are unreliable and makes flying from SAN to LAX and taking the connector bus to Union Station quicker and more reliable than the train. I have needed to rent a car at the last minute twice this past year when erosion interrupted scheduled AMTRAK routes I had planned on taking early in the morning/late in the evening from work.
8565	Jun 04, 2025, 12:12 PM	Jared D'Onofrio	Anyone oustide of a very few wealthy homeowners can see that tunneling beneath Camino Del Mar is the obvious option. Residents of City Heights saw entire blocks disappear and massive permanent disruption from I-15 going through their community, but their lack of wealth and political connections meant that the project was able to press on. This corridor is much more essential both in practical and environmental terms, and much less disruptive. Please show some courage and move past the NIMBY-ism of a few rich, connected people to do what's right and necessary for a region of millions.
8562	Jun 04, 2025, 12:01 PM	Brian Nixon	The San Dieguito Bridge to I-5 option is the alignment with the least impact on neighborhoods and offers the longest term sustainability so should be the preferred alignment. If cost estimate is prohibitive, the Under Camino Del Mar alignment is acceptable. The existing Del Mar Bluff alignment should be repurposed as pedestrian/bike path. The Del Mar bluffs double track alternative should be removed from consideration.
8561	Jun 04, 2025, 11:36 AM	James Buchanan	The Camino Del Mar option seems to be the most logical. It is the shortest, presumably making it the lowest cost option, and the one requiring the least amount of construction and associated neighborhood interruptions. And since it (generally) goes under a main

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			existing street, there should be minimal impact to neighborhoods. This seems like the only logical, cost effective, solution.
8559	Jun 03, 2025, 11:43 PM	Saad Juma, MD	Dear Honorable Members of the SANDAG Board of Directors: Thank you for the opportunity to address this board regarding the LOSSAN Rail Realignment Project. This letter is in follow up to my previous letter that I submitted to this board regarding this subject in July 2024. I am a resident of Solana Beach who reside on the border of the city of Solana Beach and the city of Del Mar. I love both cities and have vested interest in their livelihood and their economic health, and the health of the business in both cities. I have reviewed the LOSSAN Rail Realignment Project plans as proposed by you including alternatives A, B, and C, and the Del Mar Bluffs Double Track Reinforced Alternative Realignment. First, I want to commend you and thank you for adding the Del Mar Bluffs Double Track Reinforced Alternative Realignment, to the previously considered options. I fully support the Del Mar Bluffs Double Track Reinforced Alternative Realignment option and consider it the best option for several reasons. First, this option has the least negative environmental impact among the options considered. Second, it has the least negative impact on local businesses. Third, it has the least negative impact on existing homes and their occupants. Forth, it is the most economical option among the options considered. Fifth, it is the least likely option to face legal challenges and the associated cost of such challenges. In summary, the Del Mar Bluffs Double Track Reinforced Alternative Realignment is the least disruptive, most economical, and environmentally friendly option. I fully support this option.
8554	Jun 03, 2025, 03:56 PM	Hongyu Wang	Among all the options presented for consideration, the del-mar-bluffs-double-track-reinforced-alternative-alignment has been the best for all considerations. For example, Elevated highways (such as the elevated flyover at the cross of nearby 56 Highway and I-5 State Freeway) can be found in many cities around the world, including USA. This proposed double-track-reinforced-alternative-alignment should be much less demanding to complete than those common elevated highways while not impacting considerably on the existing environment and communities involved. In addition, this is likely the most cost-effective solution with the minimal environmental impacts. The other Project Alternative Alignments are not better choices, and not fair to the impacted communities, either.
8553	Jun 03, 2025, 12:24 PM	Kristin MacLeod	I'm glad to know that the No Project alternative exists, and I support it, with no change to the current arrangement of the tracks. To me it seem no proposed alternatives that stand out as being obviously good solutions. Implementation of some of the routes would cause a lot of environmental damage, and all of them will cause a great deal of community disruption. Lawsuits over this are likely to take decades. $67 million has already been spent

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			on stanchions to secure the Del Mar cliffs for the next 30 years, with another $37 million secured to use as well, so hopefully that will keep the tracks safe during that time. In 30 years, the world stands to be very different due to ravages from climate change and it seems important for the people in that time have that chance to create solutions that work for them at that point in time. So I support the No Project alternative.
8547	Jun 02, 2025, 01:43 PM	Sarah ORourke	As a lifelong san diego resident, I believe reliable train transit is overdue. I support the city in the effort to find a more stable route for SANDAG that both preserves as many of our native species habitat as possible, as well as minimizes the amount railroads would have to move in the future.
8545	Jun 01, 2025, 10:14 AM	Marc Friedmann	My first preference is the Green Line option - Del Mar Bluffs Double Track Reinforced Alternative Alignment. It would be the least disruptive to Del Mar and reduces the risk of lawsuits from the city. However, rather than a 1.5 mile seawall, I would prefer to see a bridge or viaduct approach to allow natural interaction between the sea and the bluffs. If the Green Line option turns out to not be possible, then my second choice would be the Northern Yellow Line, which wraps around the south side of the Del Mar Fairgrounds.
8542	May 31, 2025, 08:35 PM	Michelle Scheidler	This is dumb. It would cause WAY more damage to the environment to move an existing, efficient train track just so that rich people aren't annoyed. Do you care about global warming at all?? We don't care about your superficial morals.
8541	May 31, 2025, 04:54 PM	Narayan Gopinathan	Dear SANDAG, I encourage you to select the Crest Canyon alignment and build the tunnel under Del Mar as quickly as possible, with the highest possible quality. Every day the waves are pounding on the coast, causing further erosion, and the bluff could give out at an unknown point in the future, so time is of the essence. The Crest Canyon alignment is the best possible route because it would be direct, enabling trains to run at high speed, and avoid the coastal bluffs and the coastal wetlands on the current route. It should be built with double track and catenary electrification, to eliminate carbon emissions and enable higher operating speed and quality. The success of the electrification of Caltrain shows that electrification can drastically improve quality of service. If this is done, then the LOSSAN Corridor can provide sustainable transportation for generations to come. Best regards, Narayan Gopinathan
8540	May 31, 2025, 01:14 PM	Sally Lycke	Why on Earth would you underground ANYTHING in "earthquake country?" Makes absolutely no sense, especially when land has already proven to be unstable...an accident waiting to happen!

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8539	May 31, 2025, 09:10 AM	Kaylie Bryslawskyj	I oppose the no-build and reinforce existing ROW options. We need these tunnels! The Surfliner corridor, between LA and San Diego, is the 2nd highest ridership rail corridor in the country and we need to ensure the future viability of this transit option. I support high speed, double tracked options: a) Crest Canyon (4), b) Camino Del Mar (3). I also support the 110 mph design speed for Crest Canyon alignment. Crest Canyon alignment has the least impact on sensitive habitat. Reinforce existing ROW and Camino Del Mar options impact the Los Penaquitos Lagoon, while the I-5 alignment may impact the San Dieguito Lagoon. You should also leave room for catenary. Tunnel clearances and design should be future-proofed for electrification. This tunnel will cost billions. Surfliner and Coaster long-term plans envision 4 TPH through this section – which economically support catenary. Does precluding catenary from the DEIR indicate NCTD and Surfliner are abandoning this level of frequency? By precluding catenary from DEIR scope the agency is segmenting other decisions about motive power sources selection of hydrogen, which require significant fueling and safety infrastructure. Do you have a plan to mitigate the fire hazards created by hydrogen in tunnels? The catenary is not in conflict with the Coastal Act, contrary to the position of Coastal Commission staff.
8537	May 30, 2025, 05:01 PM	Harry Schmidt	I support improving the train tracks by running tracks along the I5 corridor. There is no need to dig costly tunnels, especially in earthquake prone area. Keep the project costs down, make the railway safe and complete the project as quickly as possible by installing tracks on the ground.
8536	May 30, 2025, 04:52 PM	Elizabeth Blower	I support running the train tracks along the existing transportation corridor of the I5 freeway. However, I want to see a more cost-effective and expeditious method in which the tracks are above ground, paralleling the roadway. Boring a tunnel is extremely costly, and will take many years to complete. We need safe train travel now.
8532	May 30, 2025, 11:35 AM	Jeremiah Jackson	1) My wife and I prefer the "San Dieguito Bridge to I-5 Alternative Alignment" alternative over the other three, since it appears to have the least environmental impacts to both the residents and estuary ecosystems. 2) An earlier project overseen by SANDAG from 2015 through 2017 involving the replacement of Bridge 246.1 in the Los Penasquitos Lagoon: a) violated the terms of its EIR Categorical Exclusion granted in 2014;

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			b) performed a flawed and inadequate noise study in 2009; c) impacted the nearby community with excessive night-time lighting that wasn't mitigated; d) did not maintain storm water mitigation systems required for the project by the Regional Water Quality Control Board. What assurances do we have that the upcoming EIR will have adequate noise and night-time lighting studies, and that the impact mitigation measures specified in the EIR and by the RWQCB will be correctly performed and overseen by SANDAG?
8531	May 30, 2025, 07:52 AM	Zach Paul	As someone who takes the train from Oceanside to work in Old Town, I strongly believe that the route which will speed up train services the most will be the most valuable here. Leaving the tracks along the bluffs shouldn't even be an option, that is a waste of money because it will continue to fall off into the ocean and the route needs to be sped up not slowed down and delayed constantly. Whatever options will reduce travel time and speed up trains I think is the best option, as in many cases it is still faster to drive along the route than it is to take the train, so anything that will make taking the train faster than driving will bring more riders and improve services for the good of the county.
8530	May 30, 2025, 06:29 AM	Samuel Winter	I am in favor of the crest canyon alternative alignment or any alignment that removes the train berm from Los Peñasquitos Lagoon, doesn't cut through San Dieguito Lagoon, and doesn't involve hardening the coast with seawalls or other means.
8529	May 30, 2025, 05:58 AM	Lynne Russo	I would love to see the tracks remain along the coast. It is a lovely experience to ride along the coast. At the same time, it's important for this option to be safe. If the safety aspect cannot be made a reality then an alternative rerouting of tracks is a better option.
8527	May 29, 2025, 11:23 PM	Christopher Prier	I encourage SANDAG to select either the Crest Canyon or Camino Del Mar routes for the project. The I-5 route appears to be longer and slower than the others, especially with the sharp curves required just south of crossing the San Dieguito Lagoon - this is not a good long-term solution for San Diego. The option to reinforce the current route on the bluffs also seems misguided given the bluff erosion. I encourage SANDAG to proceed with the route that will be most future-proof, and allow for the fastest travel times for passenger rail. This is a once-in-a-generation project, and the opportunity to create a long-lasting and most efficient rail corridor for San Diego should not be squandered.
8526	May 29, 2025, 07:11 PM	Shawn Caine	The effort to remove the tracks from the bluffs is applauded. However, the process has to protect the enviroment, minimize the affect on private ownership and be a long lasting solution. It is shortsighted to propose a "double track" concept on the current railroad cooridor as you are only creating additional physical pressure on the already dangerous and eroding bluffs which will ultimately be the substantail factor in causing their demise which could be catastrophic to people and property (i.e., could result in a very dangerous

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			catasrophic event)> The double tracking concept would increase the safety risks to the public who utilize the bluffs (versus creating an enviroment that would be safer - by removal) increase the noise and pollution along that cooridor and the adjacent neighborhoods, create a more dangerous condition should there be an earthquake, destroy existing habitat (e.g., flora and frogs) that are precious, further add "blight" to a beautiful coastline that should exist for the public to enjoy, add additional threatening safety concerns on multiple fronts (e.g., creating more danger with two tracks and seperate trains utilizing same - collision potential as an example), ... The problem with the double tracks boils down to worsening the situation - it goes completely against the idea of removing the tracks to stabilize the bluffs and allow the public to better utilitze their beautiful bluffs and beaches in a manner consistent with safety, good enviromental stewardship and health to the community (versus creation of a heightened nuisance and risky/threatening situation). The public wants to atrract people to their beautiful coastline, not make it a more dangerous safety risk and further disturb an already precious enviroment. Do the right thing and remove the tracks from the bluffs, just as you were originally tasked to do - this is a long term, expensive and challenging project, but you owe it to future generations to make the beach and bluff enviroment as healthy and attractive as possible. We should go out of our way to protect what we have been given - future generations deserve such and we owe our best. Thank you, Shawn Caine
8525	May 29, 2025, 07:08 PM	Justin Wong	I like the Camino Del Mar alternative the most because it would take less tunneling to build for the trains and they can resume operations as soon as possible.
8524	May 29, 2025, 07:04 PM	Kevin A.Cahill	The San Dieguito Bridge alternative is the best and least obtrusive option. It does not tunnel under any homes, which will eliminate numerous and costly litigation over eminent domain suits that will occur with the Crest Canyon and Camino Del Mar options. The change in the San Dieguito Bridge alternative to not bore under the lagoon is a great new revision that will avoid many environmental objections to the prior version. SANDAG has previously objected to this option because it is one of the more expensive options and may lead to a few additional minutes of time during train travel. I have talked with many friends who ride the train all of the time, including myself, and we do not care if this alternative adds a few more minutes of time to travel, in light of the substantial benefits this option has over all of the other options as briefly mentioned above. This option also will not disrupt businesses and travel through Del Mar during construction as the Camino Del Mar alternative will do. By aligning under Highway 5, this alternative will further avoid continued use of the Penasquitos Lagoon bridges that are subject to flooding and other environmental problems as would be continued under the Camino Del Mar, Double Track Existing Bluff Line and No Project alternatives.

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			The Crest Canyon alternative is fraught with environmental problems. It will definitely involve some litigation and delay by tunneling under some homes and eminent domain fights. Most importantly, it will substantially interrupt my and many others' daily use of Crest Canyon for running and hiking. It will also undoubtedly adversely affect the flora and fauna in Crest Canyon. The Camino Del Mar alternative is unconscionably disruptive to the business and welfare of Del Mar businesses and its residents. Even though it may be one of the least expensive options, the chaos it will bring to Del Mar businesses and those of us citizens who frequent Del Mar businesses every day far outweighs the cheaper cost of this option. This alternative has further problems because it will continue to use the Penasquitos Lagoon bridgeway which is subject to flooding and other environmental concerns. The Double Track the Existing Line alternative is absolutely ridiculous! The bluffs have continued to erode and crumble even with the millions of dollars that are being spent on the bluff stabilization projects. The probability of further bluff instability will be incredibly increased with double tracking and more weight of train travel on the bluffs. This alternative has further problems because it will continue to use the Penasquitos Lagoon bridgeway that is subject to flooding and other environmental concerns. This alternative should be dismissed outright. The new No Project alternative is absolutely insane! How can SANDAG spend over $300M in studies and value analyses and then come up with a stupid option of doing absolutely nothing? How does that even begin to solve the issues with the LOSSAN corridor?? That option clearly shows that you do not have the public interest in mind. This alternative should be immediately discarded. Please do the right thing here and approve the San Dieguito Bridge alternative. Thank you. Kevin Cahill
8519	May 29, 2025, 02:29 PM	Edward Gorham	I strongly favor option 4. Please repair, restore, and maintain the tracks in their current location. It is the best option, environmentally and economically. Sincerely, Dr Edward Gorham

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			UCSD Professor of Public Health [redacted]
8518	May 29, 2025, 01:46 PM	Katherine Kousser	I do not support a "do nothing approach". This seems like a waste of money to prevent a collapse that will eventually happen anyway. I do not support tunneling through downtown Del mar (crest canyon or Camino del mar alternatives) which seems ridiculous and a giant waste of money for area that could easily collapse or be submerged. I support the San Dieguito Bridge to I-5 Alternative Alignment. I believe this option has several advantages, including bringing Amtrak service to Carmel Valley and residents along the 56, which is not convenient at this time. At the state level, I advocate for a regional solution from San Clemente to San Diego, and this should be considered when selecting any alternative.
8517	May 29, 2025, 01:07 PM	Dean Meredith	My name is Dean Meredith, and I have lived and worked in Del Mar for 40 years. I'm asking SANDAG to please add the Northern Yellow Line (NYL) to the routes to be studied in the EIR process, as the CEO of SANDAG committed to doing at the February 28, 2025 SANDAG meeting. This sensible route has been developed by citizens, academics, and businesses in the local communities to provide the government with the most safe and effective route to achieve SANDAG's goals to move the tracks off the bluff. This route enhances safety, and protects the community's homes and businesses from severe destruction and business failures which will cripple the city of Del Mar. It includes a modular bridge structure, which leaves the land below undisturbed and is extremely economical. With the agreement to lower speed on a curve, this route accomplishes SANDAG's goals and works with the new, planned Fairgrounds event platform. The proposed Camino Del Mar, Crest Canyon, and the Bluffs routes all severely negatively impact the people and business of Del Mar and will destroy Del Mar's landscape, downtown businesses and quality of life for the 10 years of construction and forevermore. These three routes also have one located portal in the Jimmy Durante area leaves the city without the designated tsunami escape route. The current routes that SANDAG has committed to studying do not accomplish their stated goals. If safety is a priority, then putting a tunnel under homes with freight trains carrying dangerous military equipment and spewing concentrated diesel fumes from portals into the community is dangerous and an environmental disaster. Homes would be taken with eminent domain, others near portals would be subject to exhaust and decreased property values. A tunnel under homes will cause noise and vibration that exceed allowable levels for over 2,000 homes according to SANDAG's own report. A separate vibration study done by SANDAG was flawed, and that is a known fact. Double tracking on the bluff is a bad option as well. Bluffs erode over time. This is not a safe alternative for any train.

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			It is important that SANDAG study the NYL route, and choose a route that does not adversely affect the community. The Northern Yellow Line route must be part of the SANDAG's EIR process. The proposed Northern Yellow Line that SANDAG CEO says will be studied meets the criteria, supports the Fairgrounds and the community in the best way possible. I'm asking that this route be formally added to the EIR process. Thank you.
8516	May 29, 2025, 11:28 AM	Sandra Howard	It's a waste of money by repairing or putting new tracks on the bluff the bluffs will not be there for any length of time. Move it inland
8515	May 29, 2025, 11:22 AM	Stephen Howard	The rail system must be moved inland!
8513	May 29, 2025, 07:16 AM	Luke Fannin	I like the I-10 alignment the most, as it reduces the amount of boring needed while staying further from the coast to reduce the risks of coastal erosion. My #1 alternative is the crest canyon alignment
8512	May 29, 2025, 07:08 AM	Harry Williamson	The tracks should be along the I-5 corridor. Why you can't fix the SR56 to I-5 north at the same time,I don't know? Quit screwing around. Pull your head out. Move the tracks inland.
8511	May 29, 2025, 06:55 AM	Thomas Spence	These best option is Del Mar Bluffs Double Track Reinforced Alternative Alignment. As part of the beauty of taking the train is viewing the coast. This is also sainting the fastest option when riding on the train. The worst option would be the San Dieguito Bridge to I-5 Alternative Alignment this would add time to the ride which commuters do not want.
8510	May 28, 2025, 08:31 PM	Mark Johnston	I believe that we need frequent and reliable passenger rail service between San Diego and Los Angeles. Please come up a long term solution for this project that supports electrification. I'm hoping that the Crest Canyon tunnel plan is implemented.
8509	May 28, 2025, 07:18 PM	Wade Walker and Rebecca Walker	We want to voice our support for the the study of the Northern Yellow Line option that runs North of the San Dieguito Lagoon. 1. This option will not have a negative impact on ANY homes or businesses In Del Mar. 2. It has no negative impact on Solana Beach. 3. It preserves the San Dieguito Lagoon. 4. There would be no tunnels under homes or placement of portals near homes. 5. It does not displace families or require the use of Eminent Domain to force people out of their homes. 6. It allows the Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the Lagoon.

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			7. It assumes that the Fairgrounds will have their Special Events Platform as planned. 8. It runs entirely along state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families. Considering the necessity of moving the train tracks off of the cliffs in Del Mar, this 5th option (Northern Yellow Line) makes it possible to protect people, homes, and businesses and help to preserve our unique, rare and beautiful coastal environment. We strongly encourage SANDAG to seriously study this fifth option (called Northern Yellow Line) by the residents and businesses of Del Mar.
8507	May 28, 2025, 06:13 PM	Jeff Brown	Hello Sandag, I am a citizen residing in the 92014 zip code near one of the proposed tunnels. I feel very strongly that the cliff should be shored up in order to not have to move the tracks at all. Economically this is also by far the best idea. As for the efficiency, the most inefficient part of the route as a whole is the part that routes completely off the southern line from Sorrento Valley through Mira Mesa along University City until it finally heads south again. Perhaps consider saving time by fixing that problem. As for the preferred route: the only acceptable route for the citizens of this region would be to send the train to the freeway and then south. Thank you for considering my comment in your future planning. Sincerely, Jeff Brown Del Mar resident
8506	May 28, 2025, 06:11 PM	Stephanie Brown	Hello Sandag, I am a citizen residing in the 92014 zip code near one of the proposed tunnels. I feel very strongly that the cliff should be shored up in order to not have to move the tracks at all. As for the efficiency, the most inefficient part of the route as a whole is the part that routes completely off the southern line from Sorrento Valley through Mira Mesa along University City until it finally heads south again. Perhaps consider saving time by fixing that problem. As for the preferred route: the only acceptable route for the citizens of this region would be to send the train to the freeway and then south. All other options are ridiculous.

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			Sincerely, Stephanie Brown Del Mar resident
8505	May 28, 2025, 05:11 PM	Dan Louis	It is great to see the new alternative to double-track this vital rail line in it's current location, which is by far the most expedient and cost-efficient solution. There has been a small (and growing) group of us that have been promoting this concept since 2022, including presenting to SANDAG at various meetings and via conf. call on 4/17/24. The "Double Track Reinforced Alternative Alignment" is clearly the best solution, and I hope that SANDAG and all the stakeholders give it due consideration. All the other NEW rail alignments are considerably more expensive and disruptive to the communities, and it seems that the only reason that they are being developed is to try to placate the California Coastal Commission. Don't do it. Keep the rail line where it is and armor the slopes and augment the beaches, which benefits everyone and preserve a spectacular railway. And please remember that the bluffs need to be protected no matter what, so it does not make sense to spend all the money to move the railway and then ALSO spend all the money needed to protect the bluffs!
8504	May 28, 2025, 04:53 PM	kevin grold	I believe that tunneling in any form will be a costly mistake. Dr. Kevin Grold [redacted] Del Mar CA 92014
8503	May 28, 2025, 04:42 PM	Kevin Whaley	To SANDAG: My name is Kevin J Whaley and I live in Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches, coastal bluffs and canyons. SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All four of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches, coastal bluffs and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible fifth alternative with an asterisk on their drawing – “A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process.” I am writing this letter in support of the route residents are calling the “Northern Yellow Line”. “Northern Yellow Line”

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			The Northern Yellow Line (or NYL) route, going southward, is described briefly as follows: From the southern edge of the Fairgrounds special events platform to be constructed on the double track bridge west of the Fairgrounds, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then continues east above Jimmy Durante Blvd on an elevated bridge. The bridge continues eastward along the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it heads south to cross the lagoon, just west of the I-5. It then continues south under the I-5, emerging at the knoll south of Carmel Valley Road. The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow line route on the NOP would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The Crest Canyon and Camino Del Mar routes would require extensive eminent domain taking of homes, lower the value and livability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds. However, SANDAG Staff's recommendation to develop and study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling. The proposed Northern Yellow Line route offers the following advantages. It: 1) Has no negative impact on ANY homes or businesses in Del Mar 2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon 3) Has no negative impact on the City of Solana Beach 4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes 5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families. 6) Eliminates expensive tunnels under private property and below sea level 7) Assumes the Fairgrounds will have their special events platform as planned 8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to

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			Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment.
8502	May 28, 2025, 04:12 PM	Carsten Andersen	To me the rail corridor is vital to the region. In the long run a tunnel seems the best solution to move the tracks off the cliffs. Of the three proposed routes the shortest, fastest route appears to be a tunnel running roughly under Camino Del Mar (purple option). It has the least curves on the route and allows for faster rail traffic. It also appears to be the shortest section of tunnel and likely least costly. The other options require far longer tunnels and/or add extra curves and turns to bypass most of Del Mar which would lead to even slower transit times. I am sure once underground no one will notice the train or miss it blocking their view or beach access. Sincerely, Carsten Andersen
8501	May 28, 2025, 02:43 PM	Jane Howell	It is clear that a great deal of thought and work has gone into the various proposals being presented. It is clear that alignment #1 (first staff recommendation) makes the most sense of all the proposed alignments. It is also clear that an alignment that leaves tracks on the bluffs would only invite future problems as sea levels rise and the bluffs continue to erode. That said, the realignment proposals do not provide a clear future vision of how this train corridor can better benefit San Diegans--as would be created by developing a high-speed line from San Diego to Los Angeles, aligning freight tracks along the I-5 or the I-15, etc. SANDAG's chronic prioritization of highways and cars has created a lack investment in much more efficient and effective ways of moving people and freight around--ways that would decrease our dependence on cars, improve the environment as well as provide residents better modes of transportation.
8500	May 28, 2025, 12:37 PM	Leslie Sigesmund	You have spent countless amounts of money to shore up the bluffs. To then move the train is throwing good money after bad. The train should stay on the bluff. If you are hell bent on moving it, the train should go the 1-5 route. Eminent domain attempts will only be met with major lawsuits by so many players the project will be dead before it starts. Finally, so long as the disaster call the San Clemente corridor remains, there is no sense in doing anything on the San Diego side of things. Many of those houses are ready to fall off the bluff. The 12 foot containment wall is filled to capacity with debris. The CCC has not approved emergency action on zone 4 which means years before work on the San

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			Clemente corridor will be completed. Put simply, you don't start an expensive project at the end of a route before you know when the middle will be completed.
8498	May 28, 2025, 11:01 AM	Melissa Ellis	Most cost effective option and the one that would be least likely to impact people, would be the DM double track reinforced alternative alignment. This would be my first vote. My second option would be the Under Camino Del Mar alternative alignment. This option is shorter than under crest canyon and the San Dieguito Bridge to I-5. The San Dieguito bridge to I-5 alternative would disrupt lagoon animal habitats, is a significantly longer route and the sharp turn off the existing track would be problematic. This would be a horrible idea. This option costs significantly more than the other options. I am 100% against this option.
8497	May 28, 2025, 10:52 AM	Audrey Stratton	I think the best option is the yellow option, aligning the tracks with the I5. However, it's difficult to understand the alternatives without more information. Redo the maps or provide more maps that shows a satellite view with 3d. Show the residential on the map. It is mentioned in the article that tunneling under residential is involved in option, but you can't tell that from the map, which makes it difficult to understand and give thoughts. Show the setbacks clearly. How far are the tracks when they are near the I5. Provide views that zoom in at the critical junctures at a smaller scale so that you can see it. Have some section cuts of tracks next to other items so that you can see their relationship to the other items, their scale height and in space.
8496	May 28, 2025, 10:43 AM	Lane Stewart	Hello SANDAG: I am in favor of the reinforced Bluff. The Bluff could be extended by a few hundred feet from the river mouth at Los Peñasquitos Lagoon to 15th St. Public amenities could be added, such as, bike and walking trails and a green zone. Headlands and a sand retention system could be built in front of the Bluff, like the system being designed for the beaches in Oceanside. (RE:Beach www.rebeach.org) The technology is available, and this design would be the least expensive and provide the most public benefit. There would be no need for eminent domain, and since the tracks are exposed, the military could transport ordinance or other volatile chemicals without concern of a confined explosion in a tunnel. As we have learned in Oceanside, the Coastal Commission is open to the idea of Headlands and an artificial reef to retain sand on the beach to provide a defense against coastal erosion while allowing for a pleasant experience for beach enthusiasts. Thank you for considering this option.

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8494	May 28, 2025, 08:19 AM	Connor Bennett	Keeping the track on the bluffs doesn't make any sense in the long term. Under crest canyon or camino del mar make the most sense. Per the previous studies, alignments that allow for higher speeds are also preferrable. This is a once in a century investment, do it right the first time.
8493	May 28, 2025, 08:18 AM	Camilla Rang	To SANDAG: My name is Camilla Rang and I live in Del Mar. SANDAG needs to study a new rail route, the so called Northern Yellow Line, which meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches and canyons. SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible alternative with an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process." I am writing this letter in support of the route residents are calling the "Northern Yellow Line" (NYL). The NYL route is described briefly, going southward, as follows: From the southern edge of the special events platform, the Northern Yellow Line bridge turns east and runs along the southern edge of the Fairgrounds property, taking advantage of the Easement that runs around the Fairgrounds, and taking into consideration the Living Levee that will be built along the edge of the river, rising in elevation until it reaches Jimmy Durante Blvd. It then crosses over Jimmy Durante Blvd on an elevated bridge which continues eastward across the southern edge of the Del Mar Golf Driving Range which is part of the State-owned Fairgrounds property (north of the San Dieguito Lagoon) until it heads south and crosses the lagoon just west of the I-5. The line would then continues south under the I-5, emerging at the knoll south of Carmel Valley Road. The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" as well as the other three alignments do not satisfy a key project objective to "Minimize impacts in the surrounding communities to existing homes (and) businesses…" SANDAG's yellow route shown on the NOP would have severe adverse impacts on 35-60 plus homes and businesses along San Dieguito Drive and Racetrack View

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			Drive. The Crest Canyon Route and Camino Del Mar routes utilize a North Portal located at the intersection of Jimmy Durante and Camino Del Mar would require extensive eminent domain taking of approximately 35-50 homes and businesses, lower property values and livability for residents and stability of homes not taken, destroy businesses and place air-polluting portals near the coast, homes and Fairgrounds. The South Portal for the Camino Del Mar Option at the southern end of Del Mar will also take homes by eminent domain and put a portal near homes and the tunnel under homes. The Camino Del Mar option will virtually cut off the access into and out of Del Mar North and South for over a decade. The Crest Canyon Route will virtually seal off the northern access into and out of Del Mar for over a decade as well. These routes impact the Evacuation route out of Del Mar, which utilizes Jimmy Durante. Double Tracking the fragile bluff is out of the question and against Coastal Commission rules. In fact, this route already went through an EIR and was strongly rejected due to environmental impact. Nothing has changed to the better since. To install 20 foot tall beach walls all along Del Mar's beaches will destroy the whole area and the beaches will disappear completely within 1-2 decades. Homes also will have to be taken between 14-9th street due to the required construction of a second rail east of the existing rail. The train is already pretty much going by right outside people's yards. However, SANDAG Staff's recommendation to study a route that turns as it heads east to the I-5 opens the door for consideration and analysis of less expensive and less destructive possible northerly routes. The Northern Yellow Line has many advantages that the SANDAG "yellow line" and the other study routes lack. It also could cost a billion dollars less than the other study routes because less eminent domain and fewer easements would have to be obtained and there would be less boring and tunneling. The proposed Northern Yellow Line route offers the following advantages. It: 1) Has no negative impact on ANY homes or businesses in Del Mar, or any other community 2) Preserves the San Dieguito Lagoon and allows restoration of the Penasquitos Lagoon and avoids construction of a second set of rails on an additional berm right through the sensitive lagoon. 3) Has no negative impact on the City of Solana Beach

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			4) Places no Portals near homes, near the coast or near the Fairgrounds; no tunnels under or near homes 5) Runs entirely along the edge of state-owned property and minimally impacts the Fairgrounds for which compensation can be paid without displacing families. 6) Eliminates expensive tunnels under private property and below sea level 7) Assumes the Fairgrounds will have their special events platform as planned 8) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon I hope that SANDAG will fulfill their commitment to study the NYL. It is clearly possible to choose a route for the realignment that protects people, homes and businesses and our unique, rare and beautiful coastal environment. Sincerely, Camilla Rang
8492	May 28, 2025, 08:17 AM	Carl Casale	The only practical route is under Camino Del Mar. Other options cost too much and will inconvenience too many people.
8491	May 28, 2025, 08:15 AM	Camilla Rang	To SANDAG: My name is Camilla Rang and I live in Del Mar. SANDAG needs to study a new rail route, the so called Northern Yellow Line, which meets the needs of Del Mar, Solana Beach and the Fairgrounds and does not take homes from residents or destroy businesses or cause further damage to beaches and canyons. SANDAG released the NOP on May 15th and it shows four routes to be studied in the EIR. All of these routes are extremely unsatisfactory for numerous reasons including the destruction of homes, businesses, beaches and canyons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible alternative with an asterisk on their drawing – “A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process.” I am writing this letter in support of the route residents are calling the “Northern Yellow

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			Sincerely, Camilla Rang
8489	May 28, 2025, 04:57 AM	Tad Calcara	Keep the existing rail route / right of way. The Los Angeles to San Diego rail line is a vital transport link for our economy, commerce and national security. Appeasing real estate investors should not be a priority here. With today's advanced technology and resources there are ways to stabilize the existing rail line along the Del Mar bluffs. Just imagine the amount of tax payer funds that would be used if they were trying to preserve a road or freeway here or a row of high end homes? Instead of wasting our tax dollars on an expensive reroute / keep the existing 1880s built rail route. They are currently stabilizing the rail line in San Clemente/ if they can do it there we can do the same in Del Mar. this rail line is vital for both travelers and freight. Stop appeasing the real estate and NIMBY special interests/ and do the logical thing and stabilize the existing rail route!
8488	May 27, 2025, 10:40 PM	Eric Wong	There are very good reasons for moving the train away from the Del Mar coast, and they have not changed. Leaving the train on the bluffs, even with reinforcement, just punts the problem a few years into the future, and wastes tons of money in the process. Put the train where it should go based on the transportation needs of the region. Obviously some homeowners will be unhappy, but so be it. The alignment under the I-5 is obviously a NIMBY route with sub-optimal routing, while the two middle routes, Camino Del Mar and Crest Canyon, seem the most practical and efficient.
8468	May 27, 2025, 10:01 AM	Gregory Alan Graff	Leave the tracks where they are! Secure the bluffs and save us time and money. Gregory Graff Solana Beach
8467	May 26, 2025, 11:21 AM	Riley OBrien	As a transportation planner, climate justice advocate, and resident of Orange and Los Angeles counties for over 25 years, I urge SANDAG to move forward with the Crest Canyon alternative with enough tunnel clearance for catenary wires and design speeds increased to 110 mph. SANDAG and LOSSAN cannot invest billions of dollars on outdated and unreliable fossil fueled, hydrogen, or battery-powered trains when overhead wires are proven as the most economically and environmentally beneficial technology for long-distance passenger rail. Overhead catenary wires are not in conflict with the Coastal Act and will enable Coaster and Surfliner to move four trains per hour through the tunnel. Why would SANDAG risk lives and spend millions upon millions in fueling and safety infrastructure for hydrogen trains? Why would SANDAG waste electricity on unproven battery technology when catenary wires have provided clear speed and reliability benefits for Caltrain and other commuter rail systems around the world? A 110 mph Crest Canyon tunnel, electrified with catenary, is the clear choice for this vital project.

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8466	May 25, 2025, 07:55 PM	Marge Michaelson	I would like to comment that consideration should be primary to the non disruption of residence homes and businesses. This may cost more but what do you loose in taxes and ill will and destruction of communities when there are other choices. I have concern for the entire project having hear from someone who works on these projects that 300 ft under ground will not prevent vibration being felt. That has not been addressed in the article I have read. I think the plan from the Coalition for Safer Trains needs to be seriously considered. Respectfully, Marge Michaelson
8465	May 24, 2025, 07:54 PM	Karen tipler	I prefer the proposal that goes under Camino Del Mar. I think it would have the least impact on the lagoon ecosystem, which is fragile at best. I also don't think maintaining bluff. Trafic is a long-term sustainable solution.
8464	May 24, 2025, 04:25 PM	Ilene J Klein	As a concerned member of the public, I strongly oppose Option C and any alternative that includes extending a new double track through the Los Peñasquitos Lagoon. This fragile estuarine ecosystem is already under considerable stress due to river mouth closures, altered hydrology, and sea level rise. Adding more rail infrastructure—particularly a second track—would increase environmental degradation, impede tidal flushing, and disrupt ongoing and future restoration efforts. One of the most promising aspects of the LOSSAN Realignment Project is the rare opportunity to remove rail infrastructure from the lagoon altogether. Options that move the tracks inland or underground could finally allow for full restoration of the lagoon's natural processes, which would dramatically benefit water quality, native vegetation, and habitat for sensitive and migratory species. Doubling down on infrastructure in the lagoon flies in the face of ecological science and contradicts regional goals for habitat conservation and climate resilience. Let's seize this opportunity to do what's right for future generations—prioritize long-term environmental health and move the tracks out of the lagoon.
8463	May 24, 2025, 07:39 AM	Tristen Miller	Please move forward with this project. 4000 people can't block a project that will improve lives for millions. I support either Crest Canyon or Camino Del Mar alignments. Please also ensure tunnel can support catenary in the future.
8462	May 23, 2025, 03:33 PM	Matthew "Matt" Jones	Hello SANDAG, I am very happy to see that you are realigning the railroad tracks between Del Mar and San

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			Diego because I think it's a good way to make the railroad route more safe and to avoid any accidents from occurring such as the trains falling off the tracks and down the 80 foot drop of the cliff onto the beach. And if you want to know which route option I choose, I choose the alignment that goes all the way through as well as under Crest Canyon since there are no obstacles and barriers in the way. I am a Southern California railfan myself and always like to film trains safely. Hopefully, I can ride the inaugural trip over the new route when it's finally completed and the first trains start operating over it. Anyways, I hope you appreciate my feedback and also be sure to keep working really hard on the project with no delays and no strikes. Matthew "Matt" Jones (MediaRailProductions) And I also have a link to my YouTube channel: https://www.youtube.com/@MediaRailProductions
8460	May 23, 2025, 10:38 AM	Adrian Dinescu	I believe that SANDAG should prioritize the tunneled options for the obvious (and reported) travel time and long-term viability benefits for the Del Mar bluff realignment. Between the proposed tunnel alignments, the "Crest Canyon" alignment appears to make the most sense, due to the directness of the tunneled route. Second preference would be for the "Camino Del Mar" alignment to better align with existing infrastructure and arterial ROW. However, the impact to the immediate properties may be greater during construction, and this alignment puts the tracks closer to the ocean, which strikes me as the wrong move for long-term viability. "Crest Canyon" alignment offers the route with the longest tunnel (expensive to construct), but also allows for more existing open space to remain accessible to the public. One improvement could be the introduction of a rail trail on the existing rail ROW through Penasquitos Lagoon. Overall, I understand the tradeoff is a delicate balance of cost, negotiation with existing land owners, construction complexity, and time to completion, but this realignment has already taken an enormous amount of time since it was first conceived, and I believe that SANDAG should prioritize doing what is best for the overall community (rather than one specific neighborhood or customer) to enable better transit through our county, while leaving room for growth for future scalability; e.g. CA HSR is expected to someday reach San Diego or enhanced commuter rail to Orange and Los Angeles counties.

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8459	May 22, 2025, 11:05 PM	Richard O'Connor	The Crest Canyon & Camino del Mar tunneled alternatives seem like the obvious winners here. No-build is not a viable solution here, as the erosion in this area & in other similar spots along the LOSSAN corridor has made Coaster, Pacific Surfliner & Metrolink service increasingly unreliable; and while reinforcements along the current ROW could mitigate SOME of this risk, they fail to move the tracks out of their current vulnerable location & offer minimal service improvements while still costing a substantial portion of what the tunneled options would need. Additionally, any tunnel design should include the necessary vertical clearances, mechanical spaces & mounting provisions to allow for an overhead catenary system (OCS) in future, to support electrification of the LOSSAN corridor. Changes to the tunnel after construction would likely be prohibitively expensive and disruptive to service, so future-proofing is key here, and the kinds of future-proofing provisions needed for other types of electrification (e.g. ventilation & firefighting for Hydrogen trains, or other safety measures needed for trains powered by large battery banks) are likely much less well-understood than a simple catenary system. Any comments which object to OCS provisions on grounds of aesthetics or habitat disruption should be treated as working in bad faith, because: - wires on this portion of the route would be in a tunnel - not visible to anyone except the train driver! - portions of the line north of this tunnel are trenched & adjacent to large multi-lane roads; any added visual impact is minimal compared to the current environment - future electrification would actually REDUCE the line's impact on coastal aesthetics & sensitive habitats, as there will no longer be locomotives emitting diesel fumes & generating noise impacts on the area - electrification would also allow trains to accelerate faster, meaning they spend less time near any given point along the line (again reducing impact)
8458	May 22, 2025, 01:56 PM	Douglas Barry	Ridership is way down, all stations in San Diego are car dependent, and it is clear there is no need to add more trains or tracks. Going under homes and businesses and spending all that money when our state is broke is just dumb. Venting diesel up above in neighborhoods. Dumb. We know you wish you lived in Del Mar, but this proposal is purely uneducated and will never be well received. You have tons of open space, and inexpensive space East of the 5 or under it. Yet you want to tunnel under some of the most expense real estate in the area? Dumb. I know that most of Del Mar will do whatever is needed in court to prevent having the next ten years of traffic, noise, shaking, pollution, and total destruction of property values. Fix the bluffs to save money, or spend the right amount of

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			money to go under the 5 and start south of the pump station. It won't impact homes or the health of those in them. Seems pretty easy, but evidently we are learning that common sense doesn't play into your plans.
8457	May 22, 2025, 11:20 AM	John Melchior	SANDAG has come to the realization that ANY tunnel under Del Mar will be fought by the residents, who have considerable resources. The goal will be to endlessly delay any tunnel decision and thus force either the double tracking or "no build" options on the bluffs. Just to keep LOSSAN open during this battle, continued bluff stabilization with be required. This is the "no build" option at its core and would have Del Mar's support since it also prevents any future "managed retreat" from the bluffs by residents closest to the ocean. Furthermore, staying on the bluffs probably does not require eminent domain (1 track only?) and can be done in phases as required, unlike any tunnel alignment. The Del Mar bluffs will be ruined visually, but bluffs north (Solana Beach) and south (Torrey Pines) are untouched as a solace. From an engineering perspective the Camino Del Mar tunnel may be best, followed by Crest Canyon. The Hwy 5 alignment appears to only have been proposed in a vain attempt to avoid Del Mar's wrath, but it's the worst from a engineering and operational perspective. SANDAG ultimately will decide to stay on the bluffs. Clearly that's why these late bluff options were added after so many tunnel alignments were floated. Then SANDAG only has to fight the Coastal Commission about expanding bluff stabilization efforts, and they have already approved the current work. So an easier fight.
8456	May 22, 2025, 10:34 AM	Kyle McNally	I live in LA and the Surfliner is a terrific way to travel to San Diego. I support the Crest Canyon alignment, to save the bluffs, preserve the speed of the line, and connect SoCal's two great cities.
8455	May 22, 2025, 10:11 AM	Elizabeth Cervantes	Please move forward with the Crest Canyon alignment. It is the best choice for the region.
8454	May 22, 2025, 09:10 AM	Ryan Rowekamp	I support the Crest Canyon and Camino Del Mar alternatives with space for future electrification. I oppose the no build and Del Mar Bluffs Reinforced Alternative options. This is a vital transportation connection for our region, and we need to prioritize speed and reliability to get the most use out of the infrastructure.
8453	May 22, 2025, 08:54 AM	Don Forbess	I believe the Under Crest Canyon alternative alignment would be best for the security of our rail system and ridership (faster travel time). Also, Del Mar is one of the most NIMBY and rich communities in San Diego and will fight this until the next century/or the current rail falls into the Pacific Ocean. Please do what's best for the majority, thank you.

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8452	May 21, 2025, 09:56 PM	John Jacobsen	Please move forward with the tunneled options that will increase the speed of the Surfliner (Under Crest Canyon Alternative Alignment/Under Camino Del Mar Alternative Alignment), ideally designed for speeds of up to 110mph and double tracked. Please also consider leaving room for electric catenary within these tunnels so that electrification remains a viable option in the future. Not studying the potential inclusion of space for catenary will lock-in the decision for future zero-emission power sources to either Hydrogen or Battery, both of which are untested and for the most part experimental when compared to catenary electrification which is standard around the world.
8451	May 21, 2025, 09:40 PM	David Shere	Hi, You absolutely, positively, MUST go with the Crest Canyon tunnel, with room for caternary, and speeds up to 110 MPH. It's important to ask as you're getting into this project - what is the point? What is the point of having all of this infrastructure if it's going to support subpar service? It's in the interest of existing train riders, future riders who will choose the train when service is improved, and current and future drivers in San Diego County who will have more space on the road. If we're going to spend all this money anyway, we really should spend it on infrastructure that supports the highest quality service. Thank you, David
8450	May 21, 2025, 07:50 PM	Kurt Canfield	I support the alignments in the following order from most desired to least desired: 1. Crest Canyon 2. Camino del Mar 3. I-5 Tunnel 4. Reinforce existing 5. No build And while we tunnel, please make sure that we bore large enough tunnels to support the hanging of catenary wires or rods. The eventual electrification of this line may come before any Phase 2 of CAHSR, and having a higher speed, reliable connection to/from Los Angeles and San Diego would be a huge benefit to the state. If we're going to spend billions, we need to make sure this project is future-proofed. Catenary is also exempted from CEQA along existing ROW, and poses fewer safety hazards than either diesel-electric or hydrogen trains within a tunnel environment.

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8449	May 21, 2025, 06:37 PM	James King	I am in favor of alts 2 and 3
8448	May 21, 2025, 06:12 PM	Vahan Hartooni	I support the alignments that allow the maximum speeds for the millions of riders who rely on the trains along the LOSSAN corridors, including myself. Those alignments will be the Crest Canyon (4) or Camino Del Mar (3) tunnels. They should allow for top speeds of 110 mph, be double tracked, and most importantly, should be future proofed for electrification. It's frustrating that progress for clean transportation, which we could have had for more than a century, is being compromised by a few high income residents, who spread FUD about a non-disruptive tunnel, and a Costal Commission board who care more about aesthetics rather than the environment. The Crest Canyon alignment will lead to the least disruption to sensitive habitats and leaving for catenaries will prepare us to switch to electrified trains like Caltrains did in the Bay Area. Our top priority should be to offer a carbon-neutral transportation option for millions of riders who travel between LA and SD. It's ridiculous that this is even up for debate under an "Environmental Quality" policy.
8447	May 21, 2025, 05:56 PM	Kyle Jenkins	I'm writing to express strong support for the Crest Canyon (Alternative 4) and Camino Del Mar (Alternative 3) tunnel alignments being considered as part of the LOSSAN corridor realignment through Del Mar. These options are essential for ensuring long-term capacity, safety, and environmental responsibility. As you refine the DEIR, I urge you to future-proof these tunnel designs for electrification by preserving sufficient clearance for catenary infrastructure. Given the projected long-term growth in rail demand – with both Surfliner and COASTER plans envisioning up to 4 trains per hour (TPH) – electrification becomes not only viable but economically essential. A tunnel project costing billions should not preclude the most efficient, scalable motive power solution. By excluding catenary from the DEIR, the agency risks segmentation of motive power decisions and a premature commitment to hydrogen or diesel alternatives. Hydrogen in particular poses unique challenges in tunnels – including fire risk, ventilation requirements, and hazardous materials protocols. Does SANDAG or NCTD have a clear plan for managing these risks, and has it been reviewed at a programmatic level? It's also clear that there is no legal or environmental basis for opposing catenary systems under the Coastal Act. Catenary enables electric rail—a cleaner, quieter, lower-emission technology—and excluding it undermines the very environmental goals the Act is meant to

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			protect. I strongly oppose the “No Build” and “Reinforce Existing ROW” options. These fail to address the fragility of the coastal bluffs and expose the region to continued service disruptions and erosion risks. They also unnecessarily impact the Los Peñasquitos Lagoon, while the I-5 alignment may affect the San Dieguito Lagoon. In contrast, the Crest Canyon tunnel offers the lowest habitat impact of all alignments under study. Finally, I urge you to design the tunnel alignments for 110 mph operations, not merely 90 mph. If we are going to invest in such transformational infrastructure, we should do so with performance, capacity, and long-term flexibility in mind. Thank you for your leadership and vision. Please continue advancing the Crest Canyon and Camino Del Mar options – and ensure they are built to serve the region’s mobility needs for decades to come. Sincerely, Kyle Jenkins
8446	May 21, 2025, 05:50 PM	Khalil Hoque	I urge SANDAG to do the right thing for southern California and move forward with expediency on the crest canyon tunneling project. This will future proof the second busiest rail line in america for overhead electrification and coastal erosion. Time is also of the essence; SANDAG needs to be more aggressive with this project to be in line with the states climate goals. I want fewer public hearings, meetings and studies done about this project and others like it. People will be fine with the government improving their lives.
8445	May 21, 2025, 05:35 PM	Jay Robinson-Duff	I highly recommend that we proceed with either the Crest Canyon or the Camino Del Mar alignments. Crest canyon is the preferred path for me out of these two due to avoiding sensitive habitats located along the Camino Del Mar alignment. The option of do nothing, or fix what we have are unacceptable to even be on the table. We need to proceed with this option now, before the costs balloon further, and additional damage to the existing ROW renders it irrepairable. With this project we need to envision and execute a plan that provides improvement to the San Diego region. I highly recommend that we upgrade the speed from 90 to 125 MPH tracks, and leave room for a catenary within the tunnel so we can better adapt to California's green future quickly and effectively. Catenary is a great option as it would help speed up the train service to be competitive if

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			not more efficient than driving based on previous NCTD investigation. We want to take this multi billion dollar project as a time to invest in a future that will not maintain what we have, but implement a future that is better for our region. Allowing the coaster to have the ability to go faster, and run on EMUs will provide a less congested 5, and less polluted air within our community. This is the time to implement the project that will help transform San Diego in to the future that we need to strive for to succeed in our climate goals as a city. The catenary is not at odds with the Coastal Act at all. It helps provide a meaningful benefit to the coastal area, as it reduces pollution and noise. We need to be implementing this technology to help improve our coastal area's climate as is the intention of the coastal act.
8444	May 21, 2025, 05:10 PM	Leo Carpenter	Options one, two, and 3 Are Way too controversial and expensive. That leaves options 4, which I support. I wonder if even that project could ever get funded? And, it seems pretty unnecessary given that SANDAG has already invested so much money in armoring the Bluff with an expected life at least until 2050. Seems like this is a waste of $300 million planning something that will never happen anyway. And, it doesn't need to! So, option 4 for now!
8443	May 21, 2025, 05:06 PM	Robin Houghd	I vote for option number four, double tracking on the bluffs. It's less expensive and disruptive, and the federal government will never find the $4 billion tunnel. By the way, the 110 mph goal of SANDAG is unrealistic and unnecessary. Cutting Travel time by a minute is not worth billions of dollars. And, the benefit/cost analysis won't even support option for compared with "no build". But at least selecting option for we'll get us closer to the right track, so to speak.
8442	May 21, 2025, 05:03 PM	Bill Carpenter	Building a tunnel is too controversial and too expensive to ever get funded. Only keeping the tracks on the Bluff makes sense. So, I support the double tracking option, expecting that when the benefit/cost analysis is done, people will realize that they increased speed and throughput that result is not worth the more than $1 billion cost as well as environmental and community disruptions. So, when the dust settles, I think we will end up just where we are today… Single track on the Bluff that has been already well armored to last until at least 2050.
8441	May 21, 2025, 04:33 PM	Jonathan Ahituv	To whom it may concern, As a frequent rider of the Pacific Surfliner into San Diego, I am grateful to see there is work being done on improving the corridor through Del Mar and San Diego. Given the extremely high ridership of this corridor (the second highest in the nation), this is essential work. For these reasons, I highly OPPOSE no build or reinforcing the existing right of way, which would not give this corridor the quality speeds and resilience it deserves. Furthermore, I highly SUPPORT the Crest Canyon and Camino Del Mar alternatives which would provide

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			double tracked, high speed tunnels. Beyond the essentially of this transit line, Crest Canyon also has the most minimal environmental impacts. However, I fear even these alternatives do not go far enough. Currently, these tunnels are set to be built without clearance for potential installation of overhead wires. This is a massive oversight which will hurt the quality of the route for decades to come. SANDAG's projections found that with electrification, development of a tunnel, and 110mph speed, a trip from Oceanside to San Diego would take under 30 minutes, a massive improvement which would take cars off the road and give the San Diego area the transportation it deserves. Additionally, I find the omission of this catenary to be highly concerning, as without electrification, the goal of 4 trains per hour through this tunnel will be impossible to achieve: does this mean this frequency is being abandoned on such a high ridership route? Secondly, alternate fuels, such as hydrogen (which will provide worse service than electrification), may pose a significant fire risk within a tunnel: are there plans to mitigate this? Finally, I find SANDAG's concern about the Coastal Act in reference to catenary wires unfounded, as catenary is absolutely not in conflict with the Coastal Act. Thank you for your time and consideration, Jonathan Ahituv UCLA
8440	May 21, 2025, 04:31 PM	Jairo Avalos	Dear SANDAG, I strongly encourage you to move ahead with a high-speed, double-tracked rail tunnel between Oceanside and San Diego—particularly the Crest Canyon (Alternative 4) or Camino Del Mar (Alternative 3) options. These projects are vital for the future of the busy Surfliner corridor, currently the second-most traveled rail route in the country. Given the repeated disruptions caused by erosion on the Del Mar Bluffs, shifting the tracks inland into modern, future-ready tunnels is absolutely essential. However, it's concerning that current proposals might not provide enough clearance for future electrification via overhead wires. Considering the scale and cost of these tunnels, we must ensure they deliver maximum long-term value. Leaving electrification out of the DEIR scope would limit future service enhancements and prevent us from achieving higher train frequencies. Electrification using overhead catenary is widely recognized as the safest, most efficient power source for trains, especially in tunnels. Hydrogen-powered trains, on the other hand, require significant fueling infrastructure and pose serious fire and safety risks—particularly in enclosed tunnel environments. Has there been a clear and comprehensive

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			safety plan established to mitigate these inherent risks? Also, the Coastal Commission's concerns over the aesthetic impacts of overhead wires are misguided. There's no inherent conflict between rail electrification and the Coastal Act, and this point should be clarified explicitly. I ask SANDAG to: * Include tunnel clearances and designs that support future electrification with overhead wires. * Clearly address the significant fueling infrastructure needs and substantial safety hazards associated with hydrogen propulsion in tunnels. * Reject the "No Build" and "Reinforce Existing ROW" options, as these do not adequately address operational and environmental issues. * Increase planned speeds to 110 mph, maximizing travel efficiency and ridership benefits. * Prioritize the Crest Canyon alignment for its reduced impact on environmentally sensitive habitats compared to other alternatives. Please focus on long-term benefits and strategic planning rather than short-term pressures. This infrastructure project is crucial for improving regional connectivity, sustainability, and our overall quality of life for many years ahead. Thanks for considering these important points.
8439	May 21, 2025, 04:25 PM	Andrew Cobb	I think the tunnel options are great, when I travel to San Diego from LA I prefer to use the surfliner and protecting the tracks is a no brainer. It’s the third most used rail line in the country, it should be heavily invested in.
8438	May 21, 2025, 04:15 PM	Sricharan Samudrala	I would like to express my support for mainly the Crest Canyon Tunnel alternative, with the Camino Del Mar alternative as a second choice. I believe this alignment strikes a good balance of being able to support higher-speed future operations and not impacting the local environment as much as the other tunnels. I also believe that the design speeds should be studied for 110 mph - not just 90 mph, the tunnels should be double tracked, and CONTAIN ROOM FOR OVERHEAD CATENARY AND ELECTRIFICATION OF TRAINS. This tunnel is a vital link between LA and San Diego, and we should hold its construction to a high standard. Since we are already spending billions on this project, including overhead catenary will extract the most value from our investment, allowing for Coaster and Surfliner's goal of four trains per hours through this section of track. The State of California has without question answered the question of whether or not electrification is in conflict

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			with the Coastal Act, and the answer is a resounding NO! There is no excuse not to allow for the electrification of this section of track. The other "zero-emission" alternative of hydrogen trains have been tried and failed, just look towards Germany. These hydrogen trains are expensive to fuel, have worse range than any alternative, and are fire hazards, which would not bode well in a tunnel. We also need these tunnels, therefore I oppose the No Build and Reinforce ROW options. This is a crucial investment to mitigate the impacts of climate change, not tunneling will only kick the can down the road. So in summary, YES to future-proofing through leaving room for electrification, 110 mph operations, mitigating impact to sensitive environments, and tunneling. NO to lying about overhead catenary, letting our important rail infrastructure crumble, and hydrogen trains. Thank you.
8437	May 21, 2025, 04:10 PM	Thomas Mackey	Please choose the Crest Canyon alignment. We need fast, reliable, electrifed transit in the San Diego area, especially in north San Diego County. Living and growing up in North SD County showed how important this project is.
8436	May 21, 2025, 04:04 PM	tommilynn travis	My boys regularly ride those rails from L.A. to San Diego and one of them also hops off for the Marines base for duty. I honestly believe the Crest Canyon tunnel alignment would provide the fastest route, the easiest to electrify the line "take note of JR Rail's Shinkansen lines", and it would satisfy the concerns of YIMBYs, NIMBYs, and the coastal commission. If our state is going to announce having an economy larger than Japan I believe we should take lessons from Japan when it comes to improving our rail service state wide.
8435	May 21, 2025, 03:18 PM	Alex Buysse	I support the Crest Canyon alternative. This is a crucial rail corridor and more than worth the costs, and the possibility of higher speed would greatly improve the ridership experience. It’s also crucial to leave room for overhead electrical wires to future proof for the possibility of electrification down the road, and this alternative best suits that.
8434	May 21, 2025, 03:14 PM	Andrew Terenzio	I’m writing in strong support of SANDAG’s plan to underground the railroad through Del Mar and future-proof it for the fastest, cleanest, most reliable train service possible. California and the U.S. have a woeful train network compared to other countries. While it’s hard to start from scratch and build something better, this project gives us a real shot at meaningful, incremental progress. Let’s not miss the moment. This stretch of rail between LA and San Diego is already the second busiest in the country, but service constantly gets disrupted due to erosion on the Del Mar bluffs. Relocating the line inland into a tunnel is essential just to keep the corridor alive, but we shouldn’t stop there. We should seize this opportunity to go big; to make this the best rail corridor in the nation, not just the most stabilized. That means we need to support tunnel designs that allow for faster service and electrification. Right now, there’s a real risk that short-sighted decisions will bake in future

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			limitations. Some proposals don't leave enough clearance for overhead wires, and there's talk of hydrogen, which is a safety hazard in tunnels and doesn't make economic or environmental sense for frequent service. Electrification is the gold standard for clean, reliable, high-capacity rail. We need to leave room for catenary and design these tunnels with speed and ridership in mind, not aesthetics. Let's be real, the Coastal Act does not inherently conflict with overhead wires. We already allow utility poles and transmission lines in scenic areas. The argument that catenary infrastructure is too ugly to permit is just another example of delay tactics disguised as environmentalism. And speaking of outdated policy, CEQA isn't cutting it anymore. It was written for a world before climate change, and its obsession with preserving the status quo, even when the status quo is failing, has become a roadblock to real environmental progress. Doing nothing is not environmentally neutral. If we don't move this line inland, it will keep falling into the ocean, cars will stay on the road, and emissions will keep rising. That's not acceptable. We need to act like the climate crisis is real, because it is. That means building infrastructure that supports mode shift, long-term sustainability, and resilience. High-speed, electrified rail is part of that solution. Let's make sure this tunnel supports 110 mph trains, not just 90. Let's choose alignments like Crest Canyon or Camino Del Mar that avoid the most sensitive habitats and deliver the biggest rider benefits. And let's not preclude future frequency and growth by locking ourselves into a design that can't evolve. This is an easy win for the region. It's the kind of project that will pay off for decades, and all it takes is a little ambition and a refusal to settle for business as usual. Please move forward with bold, future-proofed plans. No build is not an option, and bandaid repairs just kick the can down the road. Let's do this right.
8433	May 21, 2025, 03:08 PM	Valentino L. Lendaro, Ret. Col	We recommend the I-5 Knoll Portal option for the following reasons. KEY ENVIRONMENTAL CONCERNS 1. Groundwater Disruption • Tunnel construction can alter the local hydrogeological balance. Tunnels may act as drains, potentially lowering the groundwater table and impacting nearby vegetation and water-dependent habitats. • While modern tunnel linings can minimize groundwater drawdown, temporary changes during construction may still occur, especially if tunneling passes

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			beneath or near water bodies. 2. Soil Stability and Ground Movement • The use of tunnel boring machines (TBMs) and excavation can cause soil disturbance, leading to ground movement, settlement, or even subsidence above the tunnel route. This can threaten the stability of nearby homes and infrastructure, particularly in areas with older or fragile buildings. • Soil stiffness degradation from tunneling may increase ground-borne vibrations during future train operations, potentially by up to 10 decibels, which can be disruptive to residents and damaging to structures. 3. Vibration and Noise • Both the construction phase and subsequent train operations generate vibrations and noise that can propagate to nearby buildings, disturbing residents and potentially affecting the usability of sensitive buildings (e.g., schools, hospitals). • These effects are most pronounced directly above or near the tunnel alignment. 4. Air Quality • Underground tunnels can accumulate particulate matter and other pollutants due to limited ventilation. Studies in other cities have shown that stations and tunnels, especially those near water bodies, can have significantly higher concentrations of harmful particles. • These pollutants include iron, manganese, and other metals from train operations, which may pose health risks if not properly managed. 5. Construction Impacts • Construction activities will bring increased noise, dust, and heavy vehicle traffic to the area, potentially for several years. • There is a risk of accidental damage to adjacent properties, including cracking or collapse, especially if controlled explosives are used or if the soil is unstable. 6. Habitat and Ecosystem Disruption • While tunneling generally has less surface impact than above-ground rail, there may still be disruption to local habitats during construction, particularly if staging areas or ventilation shafts are placed in sensitive locations. • If not carefully managed, changes in groundwater flow could affect local

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			flora and fauna. COMMUNITY CONCERNS FOR ADJACENT CITIZENS - Structural Damage: Residents should be concerned about the risk of settlement, cracking, or other structural impacts to their homes and businesses from ground movement during tunneling. - Noise and Vibration: Both during construction and after the tunnel opens, increased noise and vibration could affect quality of life and property values. - Air Quality: Poor ventilation in tunnels can lead to higher concentrations of airborne pollutants, which may be released into nearby stations or ventilation shafts, impacting respiratory health. - Water Table Changes: Lowering of the groundwater table could affect landscaping, trees, and possibly the foundations of some buildings. - Construction Nuisance: Expect years of construction-related disruptions, including dust, noise, increased traffic, and potential road closures. - Emergency Preparedness: Tunnels introduce new risks, such as fire, hazardous material spills, or derailments underground, which require robust emergency response . As citizens, since 1978, living adjacent to the proposed Del Mar rail tunnel realignment we will be vigilant about the risks of ground movement, noise, air quality, and water table changes. While modern engineering can mitigate many impacts, careful planning, transparent communication, and robust monitoring are essential to protect community health and property throughout the project lifecycle. Final thought- living here for 47+ years, we remember vividly the rebuilds of both bridges on Camino Del Mar/ Torrey Pines Road (one opening to the lagoon, the other over the railroad tracks). The all night long pounding of the pile drivers was but one, albeit huge, disruption to wildlife and citizens alike. It is for all the reasons listed above that we urge choosing the 1-5 Knoll Portal alternative. Concerned citizens, Nancy MacIsaac Lendaro &

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			Valentino L. Lendaro, Ret. Col, USMC [redacted] Del Mar, CA 92014 Cell-[redacted] Cell-[redacted]
8432	May 21, 2025, 03:05 PM	Jordan Snodgrass	This is the 2nd business rail corridor in the country and serves major populations centers of millions of people. The construction of these tunnels are important for multiple reasons -- climate, commerce, tourism, military security & preparedness, etc. Frankly it is embarrassing that this is even up for debate. Do we want to be a prosperous modern region or a deteriorating backwater? A population of a couple thousand should not have veto power over the benefit of millions. I believe that the fastest route (Crest Canyon) should be chosen, and it should be done in a way that considers future improvements such as electrification. And it should be done quickly. Shovels should be in the ground already! Thanks for your consideration.
8431	May 21, 2025, 03:04 PM	Nancy MacIsaac Lendaro	We recommend the I-5 Knoll Portal option for the following reasons. KEY ENVIRONMENTAL CONCERNS 1. Groundwater Disruption • Tunnel construction can alter the local hydrogeological balance. Tunnels may act as drains, potentially lowering the groundwater table and impacting nearby vegetation and water-dependent habitats. • While modern tunnel linings can minimize groundwater drawdown, temporary changes during construction may still occur, especially if tunneling passes beneath or near water bodies. 2. Soil Stability and Ground Movement • The use of tunnel boring machines (TBMs) and excavation can cause soil disturbance, leading to ground movement, settlement, or even subsidence above the tunnel route. This can threaten the stability of nearby homes and infrastructure, particularly in areas with older or fragile buildings. • Soil stiffness degradation from tunneling may increase ground-borne vibrations during future train operations, potentially by up to 10 decibels, which can be disruptive to residents and damaging to structures.

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			3. Vibration and Noise • Both the construction phase and subsequent train operations generate vibrations and noise that can propagate to nearby buildings, disturbing residents and potentially affecting the usability of sensitive buildings (e.g., schools, hospitals). • These effects are most pronounced directly above or near the tunnel alignment. 4. Air Quality • Underground tunnels can accumulate particulate matter and other pollutants due to limited ventilation. Studies in other cities have shown that stations and tunnels, especially those near water bodies, can have significantly higher concentrations of harmful particles. • These pollutants include iron, manganese, and other metals from train operations, which may pose health risks if not properly managed. 5. Construction Impacts • Construction activities will bring increased noise, dust, and heavy vehicle traffic to the area, potentially for several years. • There is a risk of accidental damage to adjacent properties, including cracking or collapse, especially if controlled explosives are used or if the soil is unstable. 6. Habitat and Ecosystem Disruption • While tunneling generally has less surface impact than above-ground rail, there may still be disruption to local habitats during construction, particularly if staging areas or ventilation shafts are placed in sensitive locations. • If not carefully managed, changes in groundwater flow could affect local flora and fauna. COMMUNITY CONCERNS FOR ADJACENT CITIZENS - Structural Damage: Residents should be concerned about the risk of settlement, cracking, or other structural impacts to their homes and businesses from ground movement during tunneling. - Noise and Vibration: Both during construction and after the tunnel opens, increased noise and vibration could affect quality of life and property values. - Air Quality: Poor ventilation in tunnels can lead to higher concentrations of airborne

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			pollutants, which may be released into nearby stations or ventilation shafts, impacting respiratory health. - Water Table Changes: Lowering of the groundwater table could affect landscaping, trees, and possibly the foundations of some buildings. - Construction Nuisance: Expect years of construction-related disruptions, including dust, noise, increased traffic, and potential road closures. - Emergency Preparedness: Tunnels introduce new risks, such as fire, hazardous material spills, or derailments underground, which require robust emergency response . As citizens, since 1978, living adjacent to the proposed Del Mar rail tunnel realignment we will be vigilant about the risks of ground movement, noise, air quality, and water table changes. While modern engineering can mitigate many impacts, careful planning, transparent communication, and robust monitoring are essential to protect community health and property throughout the project lifecycle. Final thought- living here for 47+ years, we remember vividly the rebuilds of both bridges on Camino Del Mar/ Torrey Pines Road (one opening to the lagoon, the other over the railroad tracks). The all night long pounding of the pile drivers was but one, albeit huge, disruption to wildlife and citizens alike. It is for all the reasons listed above that we urge choosing the 1-5 Knoll Portal alternative. Concerned citizens, Nancy MacIsaac Lendaro & Valentino L. Lendaro, Ret. Col, USMC [redacted] Del Mar, CA 92014 Cell-[redacted] Cell-[redacted]
8430	May 21, 2025, 02:57 PM	Brad Walters	I support the Crest Canyon alignment for being fastest. Transit users deserve the best possible alignment. Del Mar resident, if it matters. Thank you!

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8429	May 21, 2025, 02:51 PM	Jeremy Lake	I support the Crest Canyon alignment, and would like to see the state of CA High Speed rail improve as we move forward.
8428	May 21, 2025, 02:50 PM	Drs. MaryRose Consiglio and Thomas J. Sherman	We oppose tunneling of any kind given that we live in earthquake zones. We especially oppose tunneling under Crest Canyon given the impact of tunneling under the houses located there. SANDAG should consider taking the train tracks inland NORTH of ALL the Coastal Communities so no tunneling is needed and would minimize impacts to any Coastal Communities. Alternatively, there are many lagoon areas where the tracks could be brought inland before the train gets to Del Mar. Thanks for your consideration. Sincerely, Dr. MaryRose Consiglio Dr. Thomas J. Sherman Del Mar Heights
8427	May 21, 2025, 02:32 PM	Carmen Mitchell	I am writing in support of the high speed, double track options for realigning the trains either through Crest Canyon or Camino Del Mar. I live in Encinitas and enjoy taking the train either up to Santa Barbara or LA or down to downtown Dan Diego. It is imperative that the trains keep moving! We already have far too much traffic on the 5. It looks to me that the Crest Canyon alignment has the least impact on sensitive habitat. I strongly OPPOSE the No build and Reinforce ROW options. We need these tunnels! Thank you, Carmen Mitchell
8426	May 21, 2025, 02:30 PM	Alex Patton	Hello! I want to voice my concerns about the viability of the line long term if we don't invest in proper higher speed track and electrification for this route. While other technologies are absolutely emerging regarding locomotives, none of them actually compete with standard catenary electrification in the longer term. Hydrogen and battery are expensive, wasteful, heavy, and dangerous. Fossil fuel trains are ugly, polluting, and likely not economically sustainable.

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			I want to see the tunnels built large enough for electrification, and with curves for higher speeds!
8425	May 21, 2025, 02:21 PM	Amy Cheshire	My name is Amy Cheshire and I live in Del Mar. SANDAG needs to study a new rail route that meets the needs of Del Mar, Solana Beach and the Fairgrounds and doesn't take homes from residents or cause further damage to beaches, canyons and lagoons. SANDAG released the NOP on May 15th and it shows four routes to be studied. All of these routes are extremely unsatisfactory for various reasons including the destruction of homes, businesses, beaches, canyons and lagoons in Del Mar and adjacent neighborhoods. However, SANDAG has added one possible alternative as an asterisk on their drawing – "A more northerly design concept of the San Dieguito to I-5 alternative alignment will be explored during the environmental process." I am writing this letter in support of the route residents are calling the "Northern Yellow Line". The NYL route is described briefly as follows: From the southern edge of the special events platform, the Northern Yellow Line turns east and runs along the southern edge of the Fairgrounds property, rising in elevation until it reaches Jimmy Durante Blvd. It then crosses over Jimmy Durante Blvd on an elevated bridge and continues eastward across the southern edge of the Fairgrounds property (north of the San Dieguito Lagoon) until it crosses the lagoon on a bridge just west of the I-5. It then heads south under the I-5, emerging at the knoll south of Carmel Valley Road. The SANDAG "yellow line" shown in the NOP that is labelled "San Dieguito Bridge to I-5 Alternative Alignment" is not a viable alternative because it does not satisfy the project objectives. This alignment concept was rejected after 2017 environmental studies revealed that this route would destroy Tier 1 protected habitat in the San Dieguito Lagoon. It would also destroy the planned Riverpath Del Mar connection between the Coast to Crest trail and the Crest Canyon trail. One of the stated project objectives is to "Avoid and/or minimize negative effects …(on)… publicly owned parks, recreational trails, beaches, wetlands, ecological reserves, wildlife or waterfowl refuges…." The SANDAG "yellow line" route fails to meet this goal. Another project objective is to "Minimize impacts in the surrounding communities to

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			existing homes (and) businesses…" This route would have severe adverse impacts on 60 plus homes and businesses along San Dieguito Drive and Racetrack View Drive. The SANDAG "yellow line" route fails to meet this goal. However, SANDAG Staff's recommendation of a route with a sharp turn as it heads east to the I-5 does open the door for consideration and analysis of less expensive and less destructive routes. The "Northern Yellow Line" (NYL) has many advantages that the SANDAG "yellow line" lacks. It also might cost a billion dollars less than the other recommended routes. The proposed "Northern Yellow Line" route: 1) Preserves the San Dieguito Lagoon and restores the Penasquitos Lagoon 2) Has no negative impact on the City of Solana Beach 3) Has no negative impact on ANY homes or businesses in Del Mar 4) Runs entirely along the edge of state-owned property so there is no eminent domain 5) Eliminates expensive tunnels under private property and below sea level 6) Allows the Fairgrounds to build their special events platform as planned 7) Allows Riverpath Del Mar to be completed as planned which will finally link the Coast to Crest Trail and the Crest Canyon trail with a serene and safe trail along the edge of the lagoon One of the stated benefits of the Fairgrounds Special Events Platform is the improvement of traffic and emissions. Less traffic means fewer parking spaces will be needed in the Fairgrounds parking lot. This extra space can be used for the railroad. What is more important – protecting people's homes and businesses and our coastal environment or protecting a parking lot? I hope that SANDAG will fulfill their commitment to study the NYL. My hope is that it is still possible to choose a route for the railroad that protects people, homes and businesses and our unique and rare and beautiful coastal environment. Sincerely, Amy Cheshire [redacted]

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8424	May 21, 2025, 02:20 PM	Cheryl Waggoner	Please do not run the train tracks under the San Dieguito Lagoon. It will disturb the wildlife for generations to come.
8423	May 21, 2025, 02:18 PM	Chase Cohen	I support the crest canyon alignment! Build the tunnel with room for electrification down the road. This is a no brainer decision. Build crest canyon!
8422	May 21, 2025, 02:14 PM	Jason Bryslawskyj	Dear SANDAG, Myself as well as my friends and family rely on both the Amtrak surfliner to get between LA and SD as well as the Coaster to get to Oceanside. Please choose the realignment which will result in the most reliable service and future proof the rail line. I believe those are the tunnel options under canyon crest or Camino Del Mar. Please plan for the future by electrifying the trains and having double track. Thank you, Jason
8421	May 21, 2025, 11:48 AM	Vicki Yourczek	Please move the train off the Bluffs. Please use the Crest Canyon Alignment.
8420	May 21, 2025, 11:01 AM	(MR.) Kim Yourczek	Please take the train off the bluff. The daily detioration of the bluffs is obvious. Please use the Crest Canyon Alignment. Remove the train from the bluffs and wetlands.
8419	May 20, 2025, 09:51 PM	Timothy Hoang	After reviewing the alternatives, I am most in support of Alternatives 2 and 3, the Under Crest Canyon and Under Camino del Mar tunnels, because they would provide the most direct and efficient routes. Any tunnels selected must be wide enough for future electrification.
8418	May 20, 2025, 08:11 PM	Max VerKuilen	Please support the Under Crest Canyon Alternative, or secondarily the Under Camino Del Mar Alternative. With sea level rise, it is important to ensure the long-term preservation of this key rail link between California's two largest cities. These two alternatives above maintain speeds of at least 90 mph, which is lacking in the other 2 alternatives, while also relocating the rail line inland to maximally reduce future service disruptions. For a project this expensive, the benefits should be maximized in terms of speed, service, and reliability, something only the Under Crest Canyon and Under Camino Del Mar alternatives accomplish. Also, the tunnel should also be built with sufficient clearance to allow for potential future electrification of the busiest Amtrak line outside the Northeast. Caltrain electrification has been a huge success in terms of ridership, and it would be a shame for this project to not be future-proof and cost taxpayers millions of extra dollars down the line.
8417	May 20, 2025, 05:14 PM	Jake Rosen	I heavily support either the Crest Canyon (blue) and Camino Del Mar (pink) alignments as the best proposed alternatives. Please do not let this small, affluent community continue to obstruct progress on this critically needed regional infrastructure, and please do not select the mostly at-grade San Dieguito alignment.

Contribution ID	Date Submitted	First and Last Name	Let us know your thoughts in the comment box below.
			Thank you, Jake
8416	May 20, 2025, 04:46 PM	David Tran	I am strongly in support of Alts 2 (Under Crest Canyon) or 3 (Under Camino del Mar). Whichever of the tunneled alternatives is selected, I urge LOSSAN to please bore a tunnel with sufficient clearance to fit overhead catenary wires and keep future efficiency-enhancing upgrades in mind. As a regular user of the LOSSAN Corridor, this corridor could truly transform travel in the Southern California region if it were (a) more frequent (double tracking, more service, rail relocation), (b) more reliable (regular maintenance and electric trainsets), and (c) quicker (goes hand-in-hand with point a). I have never been on a Pacific Surfliner train that was not crowded to the peak. The public demands the fastest, most efficient route. If California is to meet its ambitious climate goals, selecting either of the aforementioned bored tunnel options is an absolute must. This is a once-in-a-lifetime opportunity to get it right. As an additional comment, I find it concerning that this is even being brought up for public comment. The public simply has too little technical information and background to fully comprehend and weight the pros and cons of each alternative. These decisions should only be made by an engineering team under LOSSAN's authority not the public. If public input is sought, more concrete numbers and benefits must be listed for the alternatives.
8400	May 20, 2025, 09:47 AM	Zach Thompson	Rich Del Mar residents should not be allowed to block the fiscally responsible decision to move the tracks into the most efficient route, both in time, money and future efficiency of this incredibly important route. We have wasted enough time considering alternatives over and over, meanwhile the entire corridor becomes more at risk and needs so much more help than just this one fix. as big and important as it is. please demonstrate that regional governance can work and pass the crest canyon alternative. under no circumstances should we waste any money considering maintaining the status quo of a bluff route that would subject the railroad to the same constant drumbeat of shutdowns and delays that we have been experiencing for years. our regional economy depends on us making the right choice for all of the San Diego region and not cater to the selfish requests of a small rich, white and exclusionary community like Del Mar.
8399	May 19, 2025, 09:05 PM	Jackson Piper	It will be great to have a safe rail route away from the crumbling shoreline. Please support either the Crest Canyon Alternative Alignment or the Camino Del Mar Alternative Alignment, and please ensure that the tunnel has enough height to support future overhead electrification.
8398	May 19, 2025, 08:02 PM	Sara Gersen	Of these options, Under Crest Canyon or Under Camino del Mar would be best. Any option must leave room for electrification. I live in LA and use the Pacific Surfliner if I ever travel to

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			San Diego and want to enjoy the same speed and service improvements on this route that Bay Area residents experienced with the electrification of Caltrain.
8397	May 19, 2025, 07:59 PM	Anne Wenninger	Tracks need to be inland. Climate change will never cease. Invest in the railroad inland. Do not keep patching the cliffs. Update the trains along with the route. You will make it more appealing if you invest in it properly. Why it can't go above ground? If under ground, make sure structure is stable. If this is the busiest corridor, then make it work. Emminent domain?
8396	May 19, 2025, 06:54 PM	CATHY CARRUTHERS	MOVE TRAIN FROM CLIFF!!! I have walked the cliff all my life. It is the prettiest place in the world!!!!!! (not exaggerating!) You have already DESTROYED much of the Perezii (purple coast)flowers It's heartbreaking to see how you are destroying the cliff. You are putting in walls but that is NOT going to help. If you were to take a good look at the cliff from the beach you will CLEARLY see where the water line is, which is about 15 feet below the top. The cliff falls away from there! Not the top. The water that soaks through the cliff will still happen. You are NOT solving the big problem. It's a sandstone cliff. It will always fall away and you can't stop it. MOVE THE TRAIN off the cliff.
8394	May 19, 2025, 06:02 PM	Zaccary Bradt	SANDAG should continue with the Crest Canyon or Camino del Mar alignments. The I-5 alignment has already been ruled slower for travel and more expensive to construct and it should not be pursued further. The reinforced bluffs alternative is not viable as it leaves the rail exposed to the exact environmental issues that are causing this problem in the first place. It also would likely still require slower train speeds around that section. Don't let a few dozen loud homeowners from Del Mar derail this critical project! The Crest Canyon and Camino del Mar alignments remain the best options and SANDAG should advance one of them to design and construction as soon as possible. The most emphasis should be on how quickly the alternative can be built, the cost of the construction, and the future performance of the rail line when open for service, prioritizing passenger capacity and speed. The Camino del Mar may even be able to be constructed partially with cut-and-cover construction, even if there is local opposition from Del Mar. Most importantly, the new rail runnel MUST be electrified with overhead catenary. This is the only feasible way to run consistent, high-quality transit service, including commuter rail to Oceanside and intercity rail to Los Angeles and beyond. Just look at Caltrain's success with electrified rail in the Bay Area; it is already paying dividends. Don't let BNSF bully SANDAG into not building catenary!
8393	May 19, 2025, 04:42 PM	Tracey Franks	What makes the most sense is the route that follows I-5 and drops down by the fairgrounds. Get the train as far away from the cliffs as possible. You don't want to be moving tracks again in the future.

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8392	May 19, 2025, 01:49 PM	Frank Stonebanks	Option 5: NO BUILD. We do not need to spend $20b over 10 years. The feds, state are broke. COASTER is not used. Freight can manage with fortified single or double track worst case.
8390	May 19, 2025, 12:56 PM	Eliot Foss	Under crest canyon seems the most straightforward and hopefully the best long term solution. If the tunnels have enough clearance for electrical catenary cables that is ideal
8389	May 19, 2025, 09:00 AM	James Walton	What about under the ocean tunnel ask China bring them here there awesome trolley going down I 5 to Los Angeles
8388	May 19, 2025, 08:24 AM	gabriela fernandez	Del mar double reinforcement alignment
8387	May 19, 2025, 08:23 AM	Montserrat Fernandez	Del mar bluffs reinforcement alignment
8386	May 19, 2025, 07:40 AM	Andrew Lombardi	Please think bigger Any project that does not include tunneling the area south of sorrento valley to avoid the slow canyon pass is not big enough. if we want people using rail more we need to get the travel times down and we can reduce it by 10+ minutes by getting rid of the inland canyon pass jog south of sorrento.
8385	May 19, 2025, 06:35 AM	Brian Warwick	I support the Crest Canyon or Camino Del Mar alignment options. I also support providing enough clearance for future electrification!
8384	May 19, 2025, 03:58 AM	Justin Brewer	I am in support of a tunnel under Crest Canyon as it is direct and future proof (so long as the tunnel specs are built to allow future electrification of the corridor).
8383	May 18, 2025, 11:22 PM	Andrew Graves	Hello, I am supporting the Crest Canyon and Camino Del Mar alternatives. Also, please make sure to boar the tunnels tall enough to support future overhead electrification of the corridor. This is a straightforward thing to accommodate now while still in the planning process, and would be a very short-sighted move if we seek to electrify in the future to support service frequency increases.
8382	May 18, 2025, 11:17 PM	John Kerr	I support the crest canyon alignment. It should provide the best service for riders. Please ensure that the tunnel is built with enough clearance for electric wiring for future electrification of this line!
8381	May 18, 2025, 11:11 PM	Severin Martinez	Please pursue Crest Canyon or Camino Del Mar alignments with enough space for future electrification. As an actual rider, I want a safe, fast, and reliable route that will hopefully be future proofed so that it can be electrified at a later date (and further improve service while reducing by emissions).
8380	May 18, 2025, 11:10 PM	Ed Salisbury	Support the green path (Del Mar Bluffs Double Track Reinforced Alternative Alignment). It is the most cost-efficient in the short-term.

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			Long-term, consider creating a viaduct that goes into the surf, and so eliminates wave damage to land-based tracks.
8379	May 18, 2025, 10:59 PM	Taylor Cardenes-Moore	I grew up in San Diego and frequently take the surf liner to see my family in San Diego. This is a vital rail link for many and vital to our countries security as well. The best route forward would to be to tunnel under Camino Del Mar and avoid the bluffs. Countless projects have tunneled under massive skyscrapers and done no damage so this is not only efficient but safe. Also please leave room for future electrification of the tunnel for electric trains in the future. Thank you for your time
8378	May 18, 2025, 10:50 PM	Eric Sahr	I prefer the tunneled alignments who's straighter right of way will facilitate higher train speeds, and will make the route robust to coastal erosion (the other alignments do not achieve these goals). Whatever tunnel is built, it should permit future electrification of this key line.
8377	May 18, 2025, 09:59 PM	William Winn	Please take the tracks under Crest Canyon or under Camino Del Mar, and please create enough space for electrification of this line. More important, please stop taking public input and just build what benefits the greatest number of people! Let's get on with it!
8376	May 18, 2025, 09:48 PM	Josh Block	The Crest Canyon alignment should be prioritized and constructed as quickly as possible. With the Surfliner tracks crumbling into the sea and carbon emissions at crisis levels, the upgrade to rail infrastructure must ensure high speeds and future electrification. Southern California needs better transportation.
8375	May 18, 2025, 08:59 PM	Christopher Yeh	There have been multiple occasions in the past three years when I have wanted to take Amtrak / Metrolink from Los Angeles and Orange County down to San Diego, but because the LOSSAN rail corridor was out of service, I was unable to make that trip on public transit. I urge SANDAG to prioritize the Crest Canyon or Del Mar alignments. The DEIR should highlight both climate adaptation efforts (picking a new alignment to avoid costal erosion) as well as climate mitigation efforts (conversion from diesel to electric rail). In the case of building any tunnels, please ensure that the tunnels are built to allow for future train electrification.
8374	May 18, 2025, 07:37 PM	Justin Ramirez	I think it is essential to find a safe and reliable path to keeping the LOSSAN corridor operational and expand service. However beautiful it is to ride the train that close to the ocean it is long term not safe or sustainable. Building tunnels with space for more traffic and electrification is the best long term plan that will benefit the entire region and state. Anything short of this is a failure for California.
8373	May 18, 2025, 07:26 PM	Braeden Webb	I strongly support the San Diego LOSSAN Rail Realignment project, per the May 16, 2025 NOP, and commend SANDAG's leadership on this vital initiative.

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			The LOSSAN Corridor's current alignment along eroding coastal bluffs significantly risks its reliability and resiliency. The proposed realignment is a necessary, proactive measure to safeguard this essential transportation artery and ensure continued regional service. Beyond addressing coastal erosion, I applaud the project's provision for future rail electrification. This forward-thinking aspect is vital for our region's transportation future. A realigned route enabling future electrification addresses current vulnerabilities and lays groundwork for a sustainable, efficient, and eco-friendly rail system. An electrified LOSSAN corridor offers considerable benefits: substantially decreased air pollution, aiding climate goals and improving public health through better air quality. Moreover, electric trains are more energy-efficient, quieter (reducing noise pollution), and can improve service speed and frequency. Incorporating future electrification needs into this realignment demonstrates strategic, responsible planning. This project builds a better, modern rail infrastructure for future generations, not merely preserving the existing one. I strongly urge SANDAG to proceed with the San Diego LOSSAN Rail Realignment project, ensuring its design and construction fully support future electrification. This is a crucial investment in the long-term viability, sustainability, and modernization of our regional and state transportation network. Thank you for your commitment to this critical undertaking.
8372	May 18, 2025, 07:11 PM	Alex Portney	I am in favor of the Under Camino Del Mar alignment as it is the most straightforward, involves less tunneling and allows for fast train speeds. It is critical the tunnel be future proofed to include electrification for future train improvements (see Caltrain Electrification)
8371	May 18, 2025, 06:55 PM	Aaron Posternack	Hello, I would like to speak in support of the LOSSAN Corridor Realignment Project and its efforts to save the LOSSAN corridor from falling into the Pacific Ocean. I strongly support the Crest Canyon and Camino del Mar Alignments because these provide the highest speeds and cost the least compared to the Racetrack View Drive alignment. Continuing to use the Del Mar Bluffs will perpetuate the safety issues associated with the current rail line, limit access to the beaches at Del Mar, delay the inevitable need to move the tracks inland, and miss a critical opportunity to double-track the line in this section and create conditions for railway electrification. Speaking of electrification, the tunnels proposed in

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			the Crest Canyon and Camino del Mar Alignments should be tall enough to allow for overhead electric wires to accommodate faster, cleaner, and more reliable electric trains to operate on the LOSSAN corridor. Electrification is crucial for reducing our carbon emissions and building a better public transportation network. Therefore, ensuring the tunnels are tall enough for overhead wires is a must if this project is to fulfill its full potential, and going the extra mile to do so is very much worth it. Thank you for your time and patience.
8370	May 18, 2025, 06:38 PM	Alex Tahan	I live near Del Mar and have visited and have visited many times for recreation and shopping, and I've ridden the train through Del Mar several times. This project cannot be delayed any longer. SANDAG has spend years studying alignments, it's time to focus on getting the project started and completed as soon as possible. The goals of this project should prioritize the operations of the LOSSAN corridor and the millions of people who use it every year as well as cost effectiveness. For these reasons I support the crest canyon and Camino Del Mar alignments. Also, it is crucial that this project is studied with space for electrification within the tunnels, as specified by the Regional Plan. Doing so would allow for less noise and pollution for Del Mar residents, safer and cleaner trains, and faster speeds. I strongly support studying and prioritizing this future proofing issue.
8369	May 18, 2025, 06:36 PM	Kina Bramlette	Crest Canyon is the best alternative as it is the best environmentally speaking while still being cost effective. It is crucial that SANDAG makes the fastest and long-term investment from Oceanside to San Diego to meet the climate crisis and allow people in San Diego to travel without the need for a car.
8368	May 18, 2025, 05:18 PM	William Meehan	I am a transportation advocate based in the NY area, but I frequently visit California and ride Caltrain, which just electrified with great time and reliability benefits for riders. SANDAG should prefer alignments that will offer better travel time and space for future electrification via overhead catenary (the ONLY worthwhile option for carbon-neutrality -- hydrogen is too experimental, unreliable, slow (relative to EMUs) and expensive). LOSSAN is critical to the California State Rail Plan, and any selected alternative should consider the possibility of hosting HSR trains at lower speeds on conventional tracks, like Caltrain. Similar projects can be found in Italy, where the national rail network has gradually replaced slow, diesel, coastal segments with electrified, inland tunnels. Electrification can also reduce the ventilation requirements of the tunnel. The Crest Canyon and Camino Del Mar options are clearly superior due to gentler curves, which would hypothetically allow for faster speeds once LOSSAN is electrified with catenary. The I-5 Alignment should be automatically disqualified due to sharp curves

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			leaving the current ROW near the fairgrounds, and the Bluffs alignment will not solve the resiliency problems as natural processes, worsened by climate change, continues to erode the bluffs beneath the tracks.
8367	May 18, 2025, 05:05 PM	Richard Salazar	both the Canyon Crest and Camino Del Mar alignments are good however the tunnels should leave extra space for overhead wire electrification
8366	May 18, 2025, 05:03 PM	Grace Peng	I want to move the route inland. Crest canyon is my first choice, Camino Del Mar is second. When you build the tunnels, be sure to leave overhead clearance for catenary electrification. While I understand the need to mitigate negative impacts for neighbors, they should not be able to veto a climate resilience and climate change mitigation project used by millions. This is a regional project
8365	May 18, 2025, 04:58 PM	Clem Tillier	Bored tunnel alternatives shall be of sufficient size for 25 kV overhead conductor rail, as used in Caltrain's San Francisco tunnels. This makes the tunnel design future proof for 25 kV overhead electrified trains, a worldwide standard technology.
8364	May 18, 2025, 04:19 PM	Scott Burger	Route should avoid the lagoon and leave room for future electrification of the corridor
8363	May 18, 2025, 04:14 PM	Kurt Watson	1. Please make sure that any alignment/tunnel chosen is done so with future electrification in mind. 2. I support Crest Canyon as an alignment 3. I support San Dieguito to I-5 alignment. Please do NOT try to reinforce the bluff. This is a waste of money.
8362	May 18, 2025, 03:56 PM	Kevin Burke	Please build the tunnel with enough room to run catenary wire. This is the best way to get faster all day service like Caltrain just did.
8361	May 18, 2025, 03:55 PM	Grace Peng	Please leave sufficient height clearance in the tunnel to allow future electrification
8360	May 18, 2025, 03:50 PM	Sharon Commins	Please keep the existing route alignment. Keep it reinforced, in repair, and double track it. The stunning beach views encourage travel. Tunneling is an enormous waste of resources.
8359	May 18, 2025, 03:42 PM	Suzanne Bevash	I have been a resident of Del Mar more than 20 years. My family and extended family have homes and office space in Del Mar. We love it here. I am writing on behalf of my family to strenuously object to the "Purple" and "Green" Project Alternatives. The Purple alternative should be rejected because it requires the demolition and rebuilding of the main thoroughfare through Del Mar, and as such, would destroy the functioning and enjoyment of our downtown for a very long time.

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			The Green alternative should be rejected because it is a huge step backward from the imperative that we move the tracks off the fragile cliffs because of sea level rise. We are opposed to eighteen-foot-tall seawalls, the destruction of natural bluffs, loss of beach access, long-term construction equipment on the beach, and permanent sand replenishment obligations. These impacts are not acceptable in the coastal zone, as the Coastal Commission has previously made clear. Furthermore, this option would extend by many years the current noise impacts being suffered by nearby residents as a result of the construction work being done to secure the safety of the current tracks. The current work is a nuisance, and the additional years of construction disruptions and noise will constitute an even worse nuisance for all the homeowners along the tracks. We have lost our sleep, enjoyment, and substantial rental income because of the current construction noise that continues into the night hours. Prolonging this nuisance is unacceptable. Thank you.
8358	May 18, 2025, 03:39 PM	Leslie Ridings	TWIMC, Please select either the Under Crest Canyon or Under Camino Del Mar option and please leave room in the tunnels for space for electrified catenary wires conducive to faster, more efficient and potentially zero emission electric trains. Thank you! Leslie
8357	May 18, 2025, 03:34 PM	Emmy Garnica	The yellow alternative would cause major disturbance to precious bird and wildlife habitat around the San Dieguito Lagoon. The importance of our few remaining wetlands for the survival of birdlife cannot be overestimated. Please choose a different option. Thank you.
8356	May 18, 2025, 03:28 PM	Kevin Ham	Dear SANDAG Board, With decades of successful award winning experience in transportation and economic development, I believe the best alignment for the LOSSAN corridor is to keep the current alignment along the bluffs through Del Mar. By way of background, I ran transportation organizations/prorgams from North San Diego County to South San Diego County, and also worked for CALTRANS. I served as the first full-term chair of SANDAG's rideshare program and was the co-creator of SANDAG's regional

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			vanpool, guaranteed ride home, and telecommute programs. Further, I was involved in and actively supported SANDAG's first two successful TransNet initiatives. Costs for transit projects typically go over budget, take longer than expected, and involve costly changes. Take for example the California High Speed Rail project and the recently revealed need for the early replacement of the Sprinter vehicles. This doesn't mean we should not pursue them, but it should mean that we take at least as much time to evaluate them as we do with our highway system expansions. No short cuts in evaluating their costs and impacts and receiving robust public input. The public is losing trust and patience when it comes to projects that take longer, cost more, aren't in keeping with community values, lack local input, and involve significant changes to original goals/plans. The current alignment takes advantage of unique and exceptional views that support customer traffic. Traffic on the Coaster/ Pacific Surfliner may be higher due to the exceptional views of the Coastline. Other alignments will reduce or eliminate these views and may reduce ridership and increase costs. This is not an exhaustive time list of reasons for keeping the current alignment, there are many more, but I wanted to start with my first comments on this important decision, as you consider how to move forward. Thank you. Kevin Ham
8355	May 18, 2025, 03:27 PM	Austin Moreau	Please select either the Under Crest Canyon or Under Camino Del Mar option and please leave room in the tunnels for space for electrified catenary wires conducive to faster, more efficient and potentially zero emission electric trains.
8354	May 18, 2025, 03:20 PM	Ron Rosano	A tunnel offers a long-term, climate-resilient solution for regional rail service that benefits thousands daily, including commuters, tourists, and freight movement across Southern California. The tunnel serves greater safety, environmental, and economic interests in the broader San Diego region. It avoids decades of recurring emergency repair and avoids service disruptions which greatly supports the train as a great model of transportation.

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8353	May 18, 2025, 03:14 PM	Kenneth Briggs	It seems logical to me to keep the current route and shore up the cliff. It will be the least disruptive, fastest and most cost effective. All of the other options will take to long and cost too much.
8352	May 18, 2025, 03:14 PM	Carter Rubin	I ride the Surfliner frequently from LA. I want a cost effective tunnel with room for overhead wires! We gotta electrify this train.
8351	May 18, 2025, 01:40 PM	Mark Bisaha	I am an occasional user of the Surfliner from LAX to SAN. The frequent shut-downs tell me the tracks have to move off the bluffs, so the reinforcement option is a non-starter. I like the Crest Canyon alternative because it has the highest design speed. Whatever you do, whichever option you choose, SPECIFY A TUNNEL SIZE THAT ALLOWS FOR CATENARY, whether or not electrification is in the plan today. It is a no-brainer to future-proof the line. In case I wasn't clear enough, I'll repeat: SPECIFY A TUNNEL SIZE THAT ALLOWS FOR CATENARY.
8350	May 18, 2025, 01:38 PM	Zennon Ulyate-Crow	Huge support for the replacement option that allows for the fastest train speeds! Also, please please do not miss out on the need to allow enough space for catenary in the tunnels. Without it, this project will single-handedly kill electric rail on the LOSSAN corridor. We’re not saying build it now, just make sure there’s enough space!
8349	May 18, 2025, 12:59 PM	Paul Wennberg	1. By removing infrastructure in Los Penasquitos Lagoon, either the I-5 alignment or the Crest Canyon alignment will be a major environmental improvement for Del Mar. Of these, Crest Canyon is far preferable given the higher speeds and lower price (and thus likelihood of being built). 2. It is insane not to provide sufficient vertical clearance for future electrification given the tunnel will see service for the next century.
8348	May 18, 2025, 12:34 PM	John Lacsamana	I am in support for either the San Dieguito Bridge to I-5 Alignment or the Under Crest Canyon Alignment tunnels. I believe that tunneling away from the coast is going to be more futureproof due to the coastal erosion. But it needs to be a dual track tunnel. A single track would cause way more slow downs and issues. Please design the tunnels for future high speed rail and possible electrification. It does not have to be the highest speed of 275mph, but something much higher than the average of 90mph. I know there are upgrades to 110mph. But if you can create a rail line that can be pushed to around 150mph, I think more people would use it. It's a more viable options than driving. This segment should have a much higher speed average and peak due to higher ridership.

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			Especially from Los Angeles to San Diego and back. I live in San Marcos. If I can take the Coaster from Carlsbad to Downtown San Diego in 40 minutes or less, I would do it a lot more often. But it's nearly the same time as driving a car. And with a car, I have more freedom to get to more places. Please design towards a more futureproof rail segment. One where we can upgrade rail stock, tracking, and even possibly electrify the entire segment. Working with Amtrack is very important as well.
8347	May 18, 2025, 11:04 AM	Stephen Pendergast	Public Comment on LOSSAN Rail Realignment Project I am writing to provide formal input on the San Diego LOSSAN Rail Realignment project in response to SANDAG's request for public comments on the Draft Environmental Impact Report (EIR) scoping process. After reviewing the available project materials and conducting an independent engineering analysis of the proposed alternatives, I respectfully submit the following comments for consideration. Preferred Alternative Recommendation Based on comprehensive analysis of seismic risk, cost considerations, environmental impacts, and disruption to residential and commercial activities (see https://stateofthiscity.blogspot.com/2025/05/community-feedback-on-lossan-rail.html), I strongly recommend that SANDAG prioritize detailed analysis of the Blue Line (Crest Canyon) tunnel option. While all alternatives present tradeoffs, this option offers the most balanced approach for this critical piece of infrastructure that will serve the region for a century or more. Key Considerations Supporting This Recommendation 1. Superior Seismic Safety - The Blue Line alternative presents the lowest seismic risk profile of all options, with its alignment running primarily through stable Torrey Sandstone formations. In a seismically active region like Southern California, this represents a significant advantage for critical transportation infrastructure with a 100+ year expected lifespan. 2. Environmental Protection - The Blue Line demonstrates superior environmental performance among the tunnel options, with lower potential impacts on sensitive wetland ecosystems. Its southern portal location in an undeveloped area minimizes disruption to established habitats, and the complete relocation away from the coastal bluffs supports long-term coastal preservation goals. 3. Community Impact Considerations - While all tunnel options present community

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			impacts, the Blue Line's routing through less densely populated areas and portal locations away from major residential concentrations represents a more balanced approach to minimizing direct impacts on Del Mar residents. 4. Long-term System Performance - This alternative delivers excellent operational benefits, accommodating speeds up to 110 mph while providing complete double-tracking. The resulting travel time improvements of 1.8-4.5 minutes support regional transportation goals of making rail a more competitive and viable alternative to highway travel. 5. Long-term Resilience - Unlike the Green Line option, the Blue Line completely addresses fundamental coastal erosion concerns by relocating tracks inland, providing a genuinely long-term solution rather than a continued mitigation approach. Cost-Benefit Analysis I acknowledge the significant cost of the Blue Line option ($3.7-5.0 billion) and understand the appeal of the less expensive Green Line alternative ($1.8-2.5 billion). However, I urge SANDAG to fully evaluate lifecycle costs in the EIR, including: • Long-term maintenance requirements • Potential future costs associated with continued bluff erosion • Economic impacts of service disruptions • Potential liability concerns of maintaining tracks in erosion-prone areas • Competitive grant funding opportunities specific to climate resilience projects When viewed through a 100-year infrastructure lens, the additional investment required for the Blue Line option is justified by its superior performance in safety, resilience, and environmental protection. Additional EIR Scoping Recommendations I respectfully request that the EIR include thorough analysis of the following: 1. Detailed geotechnical assessment of all alignment options with particular attention to fault crossing considerations 2. Comprehensive sea level rise modeling with projections extending through 2150 to account for the full infrastructure lifespan 3. Construction phasing plans that minimize disruption to existing rail operations 4. Quantitative assessment of travel time benefits for each alternative under various equipment scenarios including future zero-emission multiple units 5. Detailed evaluation of tunnel ventilation requirements and emergency response plans 6. Thorough analysis of community impacts during both construction and operation phases 7. Potential rail service expansion opportunities enabled by each alternative Conclusion The LOSSAN Rail Realignment project represents a once-in-a-generation opportunity to

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			address critical safety concerns while enhancing regional mobility. The Blue Line (Crest Canyon) alternative, despite its higher cost, offers the best balance of seismic safety, environmental protection, operational improvements, and community considerations. I appreciate the opportunity to provide these comments and look forward to SANDAG's continued engagement with the community throughout this important process. Respectfully submitted, Stephen L Pendergast [redacted] San Diego, CA 92129 [redacted] Cell: [redacted] cc: Del Mar City Council North County Transit District Board California Coastal Commission
8346	May 18, 2025, 11:01 AM	Alex Davis	Dear SANDAG, I urge you to select either the Camino Del Mar or Crest Canyon alignment. Choosing the I-5 alignment would condemn the Surfliner to slower speeds for the next century, while reenforcing the existing alignment would only buy us a couple decades. The only reason to choose either of these inferior options would be to appease a small number of obstructionists who, with all due respect, won't be around in 15 years. If choosing Camino Del Mar, please use robust sea level modeling to make sure the Los Peñasquitos bridge is not a vulnerability long term. Thank you for all your work to address this critical vulnerability in California's transportation system. Sincerely, Alex Davis
8345	May 18, 2025, 11:01 AM	Kristian Wittstock	The Under Crest Canyon alternative route and should be built with enough room overhead to support overhead wire electrification. The next best alternative is the Under Camino Del Mar
8344	May 18, 2025, 10:32 AM	Obadiah Valdez	Under Crest Canyon and Under Camino Del Mar are the best alternatives, and there should be sufficient clearance for future electrification. As a person who works in Carlsbad I believe this will provide the best service for those going from San Diego to North County.
8343	May 18, 2025, 10:05 AM	Barbara Shoemaker	Why a tunnel? Why not reroute a portion of the rail inland? Surely there are old rail lines that can be rebuilt? For example, There is a dead-end line between Oceanside and Escondido for the Sprinter. Freight trains also use that line. Could it be extended to 'skip' the eroding bluff and then be rerouted to Irvine? This would allow for inland light rail users

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			in San Diego and Riverside counties. More people live there than on the coast. Make the portions along the bluffs trolly lines for tourists.
8342	May 18, 2025, 08:45 AM	Nick Andert	Hello, as someone who exclusively uses the Surfliner when traveling to San Diego from LA, I strongly support finishing this necessary project as soon as possible. The under Crest Canyon and under Camino Del Mar options are best for riders, and it MUST be built with sufficient clearance for future electrification.
8341	May 18, 2025, 08:41 AM	Dominic Bendinelli	Please select a plan that makes sense for the long term future of the second busiest rail corridor in the United States and fits within the guidelines of the newly released 2050 State Rail Plan. Under Crest Canyon and Under Camino Del Mar both provide that opportunity to ensure a stable long term future, potential for double tracking and electrification. These things are needed to hit the 2050 state goals of frequent service on electrified rails. Please consider the needs of the entire region and transportation emissions of Southern CA when considering the impact this project could have toward our future. Thank you.
8340	May 18, 2025, 08:12 AM	Tracy Garber	I would vote for placing the track under Camino del Mar through the business district. Please do not disrupt the I-5 corridor, if possible. It's already a nightmare along there in the afternoons.
8339	May 18, 2025, 06:51 AM	Ellie Levy	Crest Canyon is the best of these alternatives by far. Even better if the tunnel could begin in Solana Beach to allow the bridge over the San Dieguito Lagoon to be removed
8338	May 17, 2025, 07:29 PM	Paul J. Macias	I really don't understand why you can't just keep the train iconically where it is and shore the bluffs. You're going to pay an astronomical amount regardless of what is decided, so the least impactful solution doesn't require tunnels or bridges or laying new track.
8337	May 17, 2025, 06:26 PM	Matthew Tommasino	It is my opinion that the line through Del Mar should be retained in its's original location as much as possible. That route has been San Diego's main rail link for more than 100 years and is a historic living relic of San Diego's rail history, I believe taking away the opportunity for riders of both the Amtrak Surfliner and Coaster would diminish the route's name of "the Surfline" that was givin to it by its original owner the Santa Fe railroad. Furthermore, the route predates large settlements in the Del Mar area and I feel it's unfair to make the railroad change its route due to modern day settlements. As much as I love history I also care about people. I think a much more affordable route is to add extra safety precautions near the bluff and reinforce the bluff with concrete barrier walls. This will be a much less expensive way to both secure the trackage and save money on the project. Add some extra safety equipment near the crossing as well Thanks for listening to my input. Matthew Tommasino
8336	May 17, 2025, 03:18 PM	PAUL HENKIN	So, despite management's pretense of openness to new routes for the LOSSAN tracks, that it had to choose and we could present new ideas at the community forums, FOX NEWS

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			reports that SANDAG has proposed four alternatives for relocating train tracks from the eroding cliffs of Del Mar, and public feedback will be open for nearly two months. Doesn't sound like openness to new ideas to me. I, and others I'm sure, feel doublecrossed. Many of us will not forget. Another thing, many of us are tired of SANDAG's distortions and obfuscations, This website says "The LOSSAN Rail Realignment project proposes to improve resiliency and reliability of the segment of the LOSSAN Corridor within the cities of Del Mar and San Diego, where the rail line currently runs along eroding coastal bluffs" when iIn fact, SANDAG was told to move the tracks off the bluffs. And it, too presents only the four options. One option is to leave the track in danger's path when SANDAG was told to get it off the bluffs which keep eroding anyway. And three options, all of which end up on the unstable, eroding beach below the Del Mar Fair. Basically transferring the erosion problem from the Del Mar bluffs to the Solana Beach. Who's next? The houses that will have to be demolished? Beach facilities? Other cities? After the April 5.2 magnitude earthquake near Julian, NCTD paused train service between Solana Beach and Sorrento Valley to ensure passenger safety and inspect the Del Mar Bluffs for any potential damage. Yet another commuter delay, besides all the weekend closures. Julian is 50 miles away. Tells a lot about SANDAG, concern for safety, and the sturdiness of its structures. Weak structures, unstable soil, SANDAG doesn't seem to have done a very good job of pre-planning. How long has this been in the works? We need a hundred year LOSSAN plan, not ten. My suggestion is a train route going up the I-5 corridor to Oceanside, then following the existing light rail corridor through South Oceanside, then through De Luz area (avoiding the homes,) with spur tracks to Camp Pen and all, not something that will be eroded or flooded in 10 years. We can connect to LA and the bullet trains better that way.
8335	May 17, 2025, 02:34 PM	James Twitchell	I think elevated tracks along the interstate would be the best way to go
8334	May 17, 2025, 02:26 PM	Sean Buchanan	The Del Mar public works and nearby seasonal pond with willows and other vegetation provides a rare and vital coastal habitat for birds migrating along the Southern California

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			coast to rest. The yellow route “San Dieguito Bridge to I-5 Alternative Alignment” would be devastating to this small area which is not only critical to migrants but also regularly enjoyed by joggers and birders. 198 bird species have been documented in ebird at this small site making it one of the most species-rich spots in all of Southern California. See https://ebird.org/hotspot/L1284797
8333	May 17, 2025, 02:08 PM	Sean Buchanan	I would like to register a major environmental concern with the “San Dieguito Bridge to I-5 Alternative Alignment”. Based on the SANDAG map, this rerouting would trace a path right along San Dieguito lagoon from the Del Mar Public Works area to the north end of crest canyon at the lagoon. This area of the lagoon, and nearby bushes and ponds, attract important migrating and resident birds. ebird records for Del Mar public works and this section of the lagoon document the numerous bird species that use these areas. For example, the endangered South western willow flycatcher (Empidonax traillii extimus), least Bell’s vireo (Vireo bellii pusillus), and California least tern (Sternula antillarum browni) are regularly noted in ebird reports from this area, and willow flycatchers are more commonly reported to ebird from these areas during spring migration than almost any other site in San Diego county. Furthermore, several bird species notable for being rare in Southern California frequently stop along this vital corridor on their migration along the coast where few comparable rest places now exist due to encroachment of human disturbance all along our coast. Rare species that have been noted here include Prairie and Canada warbler, painted bunting, least flycatcher, dickcissel, and orchard oriole. Of all the routes proposed, this alternative would surely have the most negative impact on local wildlife, not only further endangering these declining species but also destroying an area enjoyed by joggers, wildlife enthusiasts, photographers, and birders.
8332	May 17, 2025, 01:17 PM	Cynthia Jurado	The cliffs will continue to become increasingly dangerous shoring them u just push the issue forward and risks a catastrophic collapse at some stage. Reroute the tracks, align them with the least damage to the coast or marsh lands. Have we considered placing the tracks along over head rails rather under ground?
8331	May 17, 2025, 12:38 PM	Boris Dobrotin	Realignment has been discussed since we moved back to San Diego Co., 30 years ago. Please pick one and get to work. Any option will make some group unhappy.
8330	May 17, 2025, 12:23 PM	Christine Hurst	I support the proposal that realigns the tracks along I-5
8329	May 17, 2025, 11:49 AM	Teren Ellison	The Alternative Alignment makes the most sense moving forward. Why? 1) underground in our seismically active area is risky and 2) it is furthest from crumbling cliffs, that are unquestionably going to continue to erode and move eastward with time.

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8328	May 17, 2025, 10:50 AM	Jazmin Blais	I'd like to submit my comments on the LOSSAN rail realignment project in the Del Mar Corridor. I believe the only viable option is the proposed yellow line alternative for the following reasons: 1.) It avoids uprooting residential neighborhoods and long time residents who may not be able to afford repurchasing in Del Mar, 2.) it avoids the closure of the 101 which would strangle local, small businesses 3.) it would provide a conduit for people coming to the Del Mar Fairgrounds and relieve traffic congestion along the 5, the 101 and local surface streets. I resoundly reject the other possible rail alignments proposed. They are unhealthy for Olde Del Mar, its bluff, its people and its businesses. Thank you, Jazmin Blais
8327	May 17, 2025, 10:39 AM	Todd Gloria	Which of the options will BRING BACK a stop that will allow passengers to walk to both (a) beach and (b) race track/fair grounds? The closure of the Del Mar stop right next to the beach was and is criminal! Del Mar City and residents opinions should be ignored as they have already shown prejudice against everyone else for closing the Del Mar stop. What other neighborhood would be allowed to keep people out of public property by closing public transportation stops? And now trying to remove public transportation corridors? Please do everything to keep the VIEWS for the famous COASTER route. Tunneling will be disastrous --LOSS OF VIEWS for paying passengers, seismic movements, high water table, increased maintenance costs, animals getting into tunnel causing issues, inevitable ground movement ABOVE impacting existing structures and roads etc, AIR QUALITY issues for riders and workers inside tunnel, evacuation of limited mobility people from inside tunnel in emergency with stopped train
8326	May 17, 2025, 09:32 AM	Heather Pulaski-Curle	As a native of San Diego, I have enjoyed this railway many times over the decades I would like to see the stability of the railroad be as ecologically sound, structurally sound, and be able to also continue with the stunning views our wonderful state is known for I do not believe moving the track away from the ocean would be the best idea I believe with the

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			resources we have we can restructure and improve this vital transportation while improving the ecosystem, commerce, as well as be able to retain the beautiful views the passengers enjoy
8325	May 17, 2025, 08:26 AM	Tom Hennessy	I believe the Del Mar Bluffs Double Track Alignment is the only feasible option. It is the only way to preserve service without wasting another decade and billions on a tunnel.
8324	May 17, 2025, 06:21 AM	Judith Collier	Build it as far inland as possible. Look ahead to inevitable coastal erosion. Do not skimp; build it right the first time.
8323	May 16, 2025, 10:19 PM	Joe Torres	Please restore!!!
8322	May 16, 2025, 08:47 PM	Michael Davis	Fully support continuation of rail service on the corridor however relocation options are way too expensive and lack community support. Please find a way to maintain the service along the existing corridor. Support keeping rail on the bluff. Work with coastal commission to extend permits and continue investment to fortify the bluff.
8321	May 16, 2025, 07:35 PM	Del largent	Del Mar double tracks reinforced. The view of the ocean along the coast is part of the attraction to this rail route. It is why a lot of people take this rail. I'm local and love this route. Tourist take this as part of their visit to the California coast.
8320	May 16, 2025, 06:52 PM	Vicky James	I think it should be moved inland from its current location. If I had my way, I'd say it should run next to the 5 as far N as possible, but I realize that would be a multi trillion dollar project, and California is low on funds. Maybe you could tax more millionaires/billionaires and corporations to help solve some of our financial problems, but I realize that'll never happen.
8319	May 16, 2025, 05:53 PM	Susan Nikkel	There is a more reasonable solution than any that are being considered. Discontinue the train service along the bluffs. The train system is archaic and failing. That is why Amtrac receives millions every year to stay open. Half the time buses have been provided for transport down the coast. This is a better solution to this extravagent use of public money. NO MORE TAX MONEY FOR TRAINS!!
8300	May 16, 2025, 01:00 PM	Scott Ellis	The San Dieguito alignment does not make any sense to me. It's the most costly, has significant sharp turns (which was called out as unwanted in the documentation), would run right along where there is a walking path, and would disturb the lagoon (which recently underwent utility undergrounding to make it a more pristine habitat for the wildlife there). Under Camino Del Mar, or a Bluff Stabilization option seem more practical and direct.
8295	May 16, 2025, 12:03 PM	Sheila Krishna	This is a much needed project and I appreciate the thorough analysis and ability to comment. Please consider a route that does not tunnel underneath and disturb the Torrey

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			Pines State Reserve which would harm the environment and set a precedent for others to consider drilling in the Reserve in future for mineral extraction
8294	May 16, 2025, 11:12 AM	Sandip Patel	This is a needed project and I appreciate the thought placed into this NOP. I would like the focus to be on routes that don't disturb Torrey Pines State Reserve with a tunnel/route underneath and drilling that would disturb the Reserve. I am also concerned about setting a precedent that one can drill in Reserves and State Parks leading to drilling for other purposes such as resource extraction that will ruin our environment
8293	May 16, 2025, 11:02 AM	Raymond Collier	Build trussel's Below the cliffs in Del Mar, Out of site out of mind of the expensive homes, while leaving the original tracks in place for normal rail service till the new rail system is in service. The trussel's could be doubled tracked and the old ones removed. Or leave them in place for passing trains not that hard! It just depends who cries the most and who puts up the most money
8271	May 16, 2025, 08:29 AM	James Ravenel	Hello, I think the track should starting in Oceanside follow the 1-5 Corridor all the way to Sorrento Valley. It'll be safer and faster. I live on the track on N Vulcan Ave, Encinitas, CA 92024, so it will also improve my quality of life. Thank you for the public feedback opportunity.
8270	May 16, 2025, 08:27 AM	William Fijolek	This is a taxpayer funded project. The primary considerations should be safety and cost. The options through Del Mar offer the quickest, least expensive and best alternatives. I don't understand why more costly alternatives are even being considered. The only reason for this would seem to be political pressure of wealthy and powerful folks in Del Mar and elsewhere. Do the right thing and eliminate these more costly alternatives, in money and in time. so this project can move forward before a catastrophe happens.
8269	May 16, 2025, 08:13 AM	Zea Borok	I do NOT favor either of the underground alternatives which could have a negative impact on property values which Del mar does not want and will not benefit from. The most feasible seems to be the Racetrack View Drive.
8268	May 16, 2025, 06:42 AM	Ulla Camilla Rang	Thank you for your hard work. There is only one alignment that will work without dispersing people and force them out of their homes, and that is a northern version of the Yellow Line, as we have discussed over and over. A line that goes along the northern shore of the San Dieugito River over to I5, and from there tunneled through the hill, under or parallel to I5. To include double tracking the bluff is a enormous slap in the face on Mother Earth. 20 foot high seawalls?? Digging out - and take people's homes, the bluff east of the existing tracks?? Cement reinforcements?? The bluff will not hold. You will be risking the lives of everyone who lives there. I do not understand what you are thinking. How did this old, discarded, outdated idea make its way back?

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			A Northern Yellow line is the only line that makes any sense. I can reassure you that nobody, absolutely nobody, cares if they arrive to San Diego Santa Fe station 90 seconds later from Oceanside just because the train makes (yet another) curve. The whole speed thing is ridiculous. 90 seconds gain for 30-50 people having to leave their homes?? Any reasonable person would just say No. It's time you join that group.