



**February 27, 2025**

Delivered via email

To: SANDAG Board of Directors - [clerkoftheboard@sandag.org](mailto:clerkoftheboard@sandag.org)

401 B Street, Suite 800

San Diego, CA 92101

Attn: Clerk of the Board, Maria Rodriguez Molina, Keith Greer, Danny Veeh, SANDAG Board of Directors

**Re: Agenda Item 9 San Diego LOSSAN Rail Realignment Project Objectives and Alternative Alignments**

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 we submitted appended to Surfrider San Diego County Chapter's July 19, 2024: Comments : 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 along with letter itself:

- 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<sup>1</sup>

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<sup>1</sup> Appendix A, incorporated by reference in Surfrider's July 19, 2024 NOP comments.

- June 2, 2021: Comments to the California Coastal Commission regarding City of Del Mar Major Amendment LCP-6-DMR-20-0005-1<sup>2</sup>
- 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<sup>3</sup>
- 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<sup>4</sup>
- 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<sup>5</sup>
- July 19, 2024: Comments : 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<sup>6</sup>

We have reviewed the Value Analysis Report, the previous Notice of Preparation and the Agenda Packet for the February 28, 2025 SANDAG Board Of Directors Meeting<sup>7</sup>. The Value Analysis participants developed 16 alternative concepts, and of those 16 alternatives, SANDAG's Agenda Packet identifies 5 recommended Alternatives for analysis in the Draft EIR:

1. San Dieguito Bridge to I-5 Knoll - derived from VA study alternative 14.
2. Under Crest Canyon (Under Jimmy Durante to I-5 Knoll) - VA study alternative 6.
3. Under Camino Del Mar (Under Jimmy Durante to Torrey Pines Road West - VA study alternative 8.
4. Del Mar Bluffs Double Track Reinforced - VA study alternative 12.
5. No Build.

We commend SANDAG for making the effort to refine alternatives after the initial NOP and Alternative Analysis. For the reasons outlined below, we can support further study of all of the alternatives listed above with the exception of number 4: Del Mar Bluffs Double Track Reinforced (VA study alternative 12). We do not believe that this

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<sup>2</sup> Appendix B, incorporated by reference in Surfrider's July 19, 2024 NOP comments.

<sup>3</sup> Appendix C, incorporated by reference in Surfrider's July 19, 2024 NOP comments.

<sup>4</sup> Appendix D, incorporated by reference in Surfrider's July 19, 2024 NOP comments.

<sup>5</sup> Appendix E, incorporated by reference in Surfrider's July 19, 2024 NOP comments.

<sup>6</sup> Appendix F, incorporated by reference as Surfrider's July 19, 2024 NOP comments.

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[https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/3163480/Item\\_9\\_-\\_SDLRR\\_Project\\_Objectives\\_and\\_Alt\\_Alignments.pdf](https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/3163480/Item_9_-_SDLRR_Project_Objectives_and_Alt_Alignments.pdf)

alternative is viable or consistent with previous Federal Consistency approvals requiring plans to relocate the tracks away from the bluff. Maintaining the tracks in place would be both risky and have significant continued impacts on coastal access and recreation inconsistent with CEQA and the Coastal Act. We also feel that the No Build Alternative would create similar impacts and risks but must be studied under CEQA guidelines. The No Build Alternative must be abandoned for alternatives that preserve the integrity of rail travel and eliminate the impacts to coastal access and geology caused by previous stabilization projects. These previous projects were considered temporary.

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) as well as further Alternative Refinement include:

1. The tracks should not remain in place indefinitely
2. The new platform at the racetrack should be maintained
3. Moving the entire rail corridor inland would result in a significant loss of coastal access and be inconsistent with the Coastal Act.
4. Alternatives that require coastal armoring are the least desirable and would require significant mitigation and environmental review
5. Timelines for improving coastal access and removing coastal armoring should be developed
6. Additional impacts should be evaluated

**1. The tracks should not remain in place indefinitely**

Both the No Build alternative and Double Track Reinforced alternatives keep the existing tracks in place where they will continue to be threatened by sea level rise, wave erosion and subaerial processes. These two options are not consistent with the stated project objectives in the Agenda report attachment:

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

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

The No Build and Double Track Reinforced alternatives are also not consistent with previous CCC approvals for DMB5 projects that made clear the seawalls were temporary as was the track. SANDAG is required to remove the tracks from the bluff. In addition, building a new double track on the bluff with seawalls is a new development and not consistent with the Coastal Act<sup>8</sup>. Section 30253 requires that new development not in any way require a seawall.

*"30253. 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."*

While CEQA requires a No Build (Project) Alternative to be studied<sup>9</sup>, it is unclear why a

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<sup>8</sup> The rail project is a Federal Consistency Finding and not reviewed by the local office. Therefore the standard of review is chapter 3 of the Coastal Act. See for example this footnote 13 at page 90 from one of the DMBS projects "13 Note that the City of Del Mar has a certified Local Coastal Program that constitutes the standard of review for development projects within the City. However, the standard of review for the Commission's federal consistency review is the enforceable policies of Chapter 3 of the Coastal Act. Because this process is how the Commission has historically reviewed SANDAG projects along this section of rail, this report focuses only on Coastal Act policies. "

<https://documents.coastal.ca.gov/reports/2022/6/W7b/W7b-6-2022-report.pdf>

<sup>9</sup> Section 15126.6 - Consideration and Discussion of Alternatives to the Proposed Project

(e) "No project" alternative.

(l) The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of

new project such as the Double Track Reinforced alternative is under consideration due to the significant impacts and infeasibility of maintaining the tracks in place. As mentioned in the agenda packet this alternative is not sustainable and contains numerous risks<sup>10</sup>.

*“While the stabilization projects and emergency repairs address safety and operational concerns with a 30-year design life, they 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 San Diego LOSSAN Rail Realignment Project is a long-term solution to ensure the rail corridor is safe, reliable, and resilient.”*

## **2. The new platform at the racetrack should be maintained**

The new platform at Del Mar racetrack must be maintained to ensure that rail oriented beach access is provided. The new platform is consistent with coastal act policies. Moving the platform underground or away from a short trail to the coast is inconsistent with access policies of Chapter 3 of the Coastal Act ARTICLE 2. Public Access [30210 - 30214] . Many alternatives from the Value Analysis Study, such as 10 (Relocate LOSSAN corridor along I-5 from Oceanside to Sorrento Valley) and 14 (Locate North Portal in Solana Beach Trench to South Portal at I-5 Knoll with bored tunnel under Fairgrounds and I-5 / , Proposed NOP Alternative A) would impede such access by eliminating or undergrounding the special events platform. It appears that the Alternative in the Agenda Packet titled “San Dieguito Bridge to I-5 Knoll” would maintain the new platform as would the other 4 proposed alternatives. No alternative that eliminates the platform should be pursued. See <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2004020/3329/360524012.pdf> at pages 41-42.

*“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*

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describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125).

<sup>10</sup> Page 1 of Agenda Packet

[https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/3163480/Item\\_9\\_-\\_SDLRR\\_Project\\_Objectives\\_and\\_Alt\\_Alignments.pdf](https://legistarweb-production.s3.amazonaws.com/uploads/attachment/pdf/3163480/Item_9_-_SDLRR_Project_Objectives_and_Alt_Alignments.pdf)

*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.”*

### **3. Moving the entire rail corridor inland would result in a significant loss of coastal access and be inconsistent with the Coastal Act.**

Alternative 10, Relocate LOSSAN corridor along I-5 from Oceanside to Sorrento Valley, would not only eliminate public transit access to the coast in Del Mar but would also eliminate coastal access in many other locations in Oceanside, Carlsbad, Encinitas and Solana Beach. Alternatives that jeopardize public transit coastal access and access to existing residential and business districts will need significant CEQA and NEPA review of impacts to recreation, traffic and greenhouse gasses.

Moving the entire rail corridor inland without mitigating existing coastal access is inconsistent with the access policies of Chapter 3 of the Coastal Act ARTICLE 2. Public Access [30210 - 30214].

### **4. Alternatives that require coastal armoring are the least desirable and would require significant mitigation and environmental review**

Options that are subject to sea level rise and require floodwalls or other protective devices must be an option of last resort and if utilized, appropriate mitigation and worst case modeling used in design and environmental review under CEQA and NEPA to ensure long term viability and protection of coastal resources and public safety.

### **5. Timelines for improving coastal access and removing coastal armoring should be developed**

SANDAG should proceed with developing a timeline and process for providing new horizontal and vertical coastal access on Del Mar's bluff, as well as removing 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 are project goals. In addition, the removal and access were mitigation measures in previous CEQA and/or Coastal Commission actions by SANDAG.

## **6. Additional impacts should be evaluated**

As mentioned in our previous comment letter, 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.

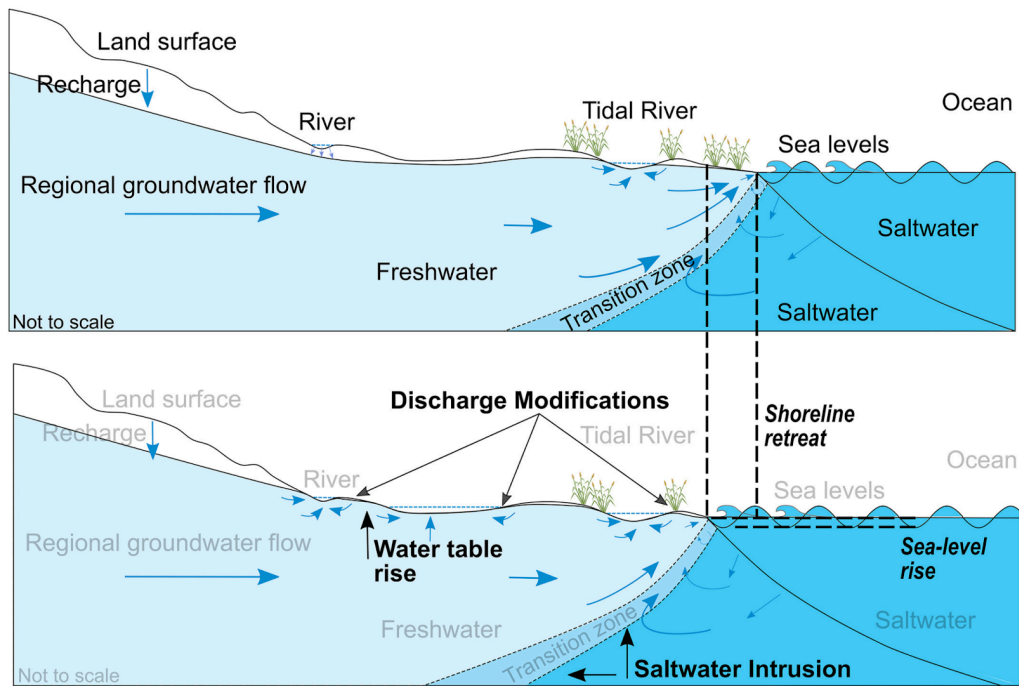


Figure 1: Comparison between current water levels (top) in the low-lying zone and potential changes (saltwater intrusion, levels/water table rise and discharge modifications) due to climate change induced sea-level rise (SLR) in coastal unconfined aquifers and shoreline retreat impacts on coastal shallow groundwater (bottom) with landward encroachment resulting in an eroded coastline, readjustment of the shoreline and bottom profile under SLR.<sup>11</sup>

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. Many alternatives including those with portals in the I5 Knoll and some alternatives with a Sorrento Valley Portal may impact coastal bicycle and pedestrian access in may impact these areas during and after 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.

<sup>11</sup> 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. [Groundwater Rise and Associated Flooding in Coastal Settlements Due To Sea-Level Rise: A Review of Processes and Methods](https://doi.org/10.1002/2021EF002580)





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.

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

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