



MID-COAST CORRIDOR
TRANSIT PROJECT

Chapter 8 Public Outreach, Scoping Process, and Scoping Comments



8.0 PUBLIC OUTREACH, SCOPING PROCESS, AND SCOPING COMMENTS

This chapter describes public outreach and agency coordination undertaken by the San Diego Association of Governments (SANDAG) prior to and during the California Environmental Quality Act (CEQA) scoping process and summary and analysis of the comments received from the public and agencies during scoping. Through the scoping process, SANDAG invited all interested individuals and organizations, public agencies, and Native American Tribes to comment on the scope of the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR), including the project's purpose and need, the alternatives to be studied, the impacts to be evaluated, and the evaluation methods to be used in preparation of the Draft SEIS/SEIR.

8.1 PUBLIC OUTREACH

Public outreach activities were conducted before and during the scoping process for the Mid-Coast Corridor Transit Project to ensure public awareness of opportunities to review and comment on the project. The activities included the following:

- Project briefings and presentations for key stakeholders and other interested parties in the corridor, including elected/agency officials, community groups, employers/institutions, environmental organizations, transportation advocates, and business/trade organizations;
- Developing and implementing the *Draft Mid-Coast Corridor Transit Project Public Involvement Plan (PIP)* and developing a stakeholder database;
- Establishing the Mid-Coast Corridor Transit Project Working Group (PWG) to provide input on the project purpose and need, alternatives for consideration in the environmental review process, the Draft SEIS/SEIR, and the Draft PIP;
- Placing scoping meeting notices in newspapers of general circulation;
- Providing key documents and public information materials in both English and Spanish;
- Posting up-to-date project information on the www.sandag.org/midcoast and www.keepsandiegomoving.com SANDAG Web sites, and publicizing via e-mail and telephone communications; and,
- Recording comments that were received at, and subsequent to, the scoping meetings through mail and email correspondence during the scoping period.

8.1.1 City of San Diego Planning Groups

Informational presentations providing a summary of the *Draft Comparative Evaluation of Alternatives Report* and findings for the Mid-Coast Corridor Transit Project were presented to community planning groups prior to and during the scoping period. The informational presentation included a review of alternatives considered, purpose and need, analysis and findings, a video of alternatives recommended for scoping, and information on the scoping period. This informational presentation was presented to University Community Planning Group on April 13, 2010. After hearing comments from the public at the meeting, the group

unanimously passed a motion to strongly support Light Rail Transit (LRT) Alternative 1 and to eliminate LRT Alternatives 3 and 6.

This informational presentation for the Mid-Coast Corridor Transit Project was presented to the Linda Vista Planning Group on April 26, 2010. After receiving the report on the project, the Linda Vista Planning Group heard comments from the public at the meeting, but took no action on the project.

During the scoping period, the informational presentation for the Mid-Coast Corridor Transit Project was presented to the Clairemont Community Planning Group on May 18, 2010 as an information item.

8.2 SCOPING PROCESS

SANDAG issued a Notice of Preparation (NOP) for a SEIR to 120 agencies and tribes on April 28, 2010. The NOP was posted with the State Clearinghouse and the San Diego County Office of the County Clerk. All business and residential addresses located within one-half mile of the alternative alignments under consideration were sent a postcard notification of the scoping meetings. The scoping meeting invitation postcard was mailed to a total of 24,959 addresses. The project team delivered scoping meeting invitation fliers to the offices of elected officials, cities, community planning groups, and other groups located within the corridor, to increase community awareness of the project and to promote participation at the scoping meetings. Meeting notices/advertisements were published in local newspapers to announce the scoping meetings.

Five scoping meetings were conducted in the Mid-Coast Corridor, in compliance with CEQA guidelines. In total, 215 people attended the scoping meetings.

The meetings were conducted in an open house style with several stations providing information about the project. The stations included: Check-In, Project and Process Overview, Draft Comparative Evaluation of Alternatives, Alternatives for Scoping, Public Involvement, and Comments. Project team members staffed the stations, making themselves available to answer questions about the project. A Spanish translator and materials in Spanish were also available (no attendees required translation).

In addition to the staffed stations, a video presentation ran on a loop throughout the entire open house period. The video included information and graphics about the location and characteristics of the Mid-Coast Corridor, an animated map showing the three alternatives for scoping, and a “flyover” of each alternative using GoogleEarth satellite images of the corridor.

Following are the scoping meeting dates and locations, including the number of attendees at each meeting:

Downtown San Diego
Wednesday, May 5, 2010
SANDAG Board Room
401 B Street, 7th Floor
San Diego, CA 92101
Number of attendees: 13

Clairemont
Thursday, May 20, 2010
Clairemont High School Cafeteria
4150 Ute Drive
San Diego, CA 92117
Number of attendees: 35



University of California, San Diego (UCSD) Campus
Tuesday, May 11, 2010
Price Center East Ballroom
9500 Gilman Drive
La Jolla, CA 92093
Number of attendees: 101

Old Town
Tuesday, May 25, 2010
Caltrans District 11
Gallegos Conference Room
4050 Taylor Street
San Diego, CA 92110
Number of attendees: 23

University City
Wednesday, May 12, 2010
Lawrence Family Jewish Community Center
Garfield Theater
4126 Executive Drive
La Jolla, CA 92037
Number of attendees: 43

8.3 Scoping Comments

Comments on the Mid-Coast Corridor Transit Project were received during the scoping period through the following methods: verbal testimony or written comment cards at the scoping meetings; and via e-mail, postal mail, and telephone correspondence. The comments covered a variety of topics and were submitted by various parties, including: agencies, community organizations, elected officials, and members of the general public.

The 30-day scoping period began on May 3, 2010 and closed on June 1, 2010. Scoping comments were accepted for one week after the close of the scoping period to account for any comments that were in the mail. In all, 244 comment submissions were received. Comment submissions included any letters, e-mails, phone calls, comment forms, or verbal comments given by an individual or an organization. In most cases, each submission included multiple comments.

The Mid-Coast Corridor Transit Project *Scoping Report* (SANDAG 2010) includes all agency and public comments received during scoping. Comments were related to purpose and need, alternatives considered, the evaluation of the alternatives, costs and funding, and issues to be studied in the Draft SEIS/SEIR. Comments were categorized into six major categories and 21 sub-categories (or topics). A brief analysis of the comments by category, and their respective topics, is provided below.

8.3.1 General Comments

General comments identified an overall need for improved transit service, not limited to the Mid-Coast Corridor. Suggestions included expanding transit operating hours and developing a transit policy/system that would eliminate the need for individual automobiles in the San Diego area. Other comments suggested a need for transit system improvements/features, including bathrooms and increased public art.

Several general comments pertained to the Mid-Coast Corridor. Some comments advocated for enhanced transit services to areas within the Mid-Coast Corridor not served by the proposed alternatives, including: La Jolla, Miramar, Pacific Beach, Ocean Beach, Sorrento Mesa, Sorrento Valley, Torrey Pines, the San Diego International

Airport, Interstate 805 (I-805), I-8, and State Route 163 (SR 163). Other comments suggested serving entirely different corridors, such as I-15 or I-5 north of I-805. One comment suggested a connection between the Poway area and UCSD.

There were also several suggestions for other projects in the Mid-Coast Corridor, including: COASTER enhancements, such as double track, a tunnel, and additional stations; roadway improvements, such as a Regents Road bridge; and, pedestrian and bicycle projects at various locations. One suggestion was to add pricing to existing freeways rather than provide additional transit capacity. Another comment suggested following a systemwide approach to San Diego County's transportation problems rather than developing an individual project.

8.3.2 Comments Related to Purpose and Need

Five comments specifically were related to the project purpose and need. The comments focused on the need for connecting transit service to the project, on clarifying the nature of transit-supportive land uses identified in the purpose and need, expanding the definition of need to include additional travel markets, and clarifying what would constitute a competitive trip time. One comment questioned the need for the project and suggested the resources be directed to upgrade existing light rail transit (LRT) lines, including new elevators and the addition of restrooms.

8.3.3 Comments Related to Alternatives

Comments related to the alternatives were analyzed by each of the individual topics listed below. Of the 244 comment submissions received, 177 (over 70 percent) included comments related to the technology of the alternatives. In addition to the topics listed below, there were questions about the type and location of supporting facilities and other project features, such as station parking, and the interface of the project with shuttles and other transit services. One comment noted that any alternative must meet the Americans with Disabilities Act (ADA) requirements. Other comments questioned using LRT in favor of heavy rail transit (powered by an electrified third-rail) or diesel single-unit vehicles.

8.3.3.1 Bus Rapid Transit

Three comment submissions by one organization requested the inclusion of a bus rapid transit (BRT) alternative in the SEIS/SEIR.

8.3.3.2 Light Rail Transit Alignments/Routes

Most of the comments received for alignments/routes were supportive of LRT Alternative 1. A total of 97 comment submissions specifically supported LRT Alternative 1, while 12 comment submissions were supportive of any LRT alternative, three comment submissions supported LRT Alternative 1 or 6, and two comment submissions supported LRT Alternative 3. One-hundred and seven comment submissions were opposed to LRT Alternative 3, three were opposed to LRT Alternative 6, and two were opposed to LRT Alternative 1.

Concerns with LRT Alternative 1 were related to looping back to the south, complicating a potential future extension north. The comments that objected to LRT Alternative 3 cited the proximity to Rose Canyon Open Space Park, potential environmental effects of



the project on Rose Canyon Open Space Park and adjacent areas, and concerns with tunnel construction. The limited support for LRT Alternative 3 identified advantages associated with a potential future extension north. Other comments opposed LRT Alternative 6 because of its design or potential environmental and transportation impacts on the Lawrence Family Jewish Community Center.

Several alternative alignments or project configurations were suggested, including:

- A design option to LRT Alternative 1 that would replace the UCSD West Station with a Veterans Administration (VA) Medical Center Station, crossing I-5 south of Voigt Drive.
- An alignment following LRT Alternative 1, but terminating in the vicinity of the Gilman Drive/Voigt Drive intersection, along with the construction of a separate dedicated right-of way loop for rubber-tired transit that would connect UCSD, University Towne Centre (UTC), and the COASTER Sorrento Valley Station.
- An alignment following LRT Alternative 1, but extending north from the UCSD West Station through the UCSD Park north of Voigt Drive to Genesee Avenue.
- An alignment serving Pacific Beach by crossing Mission Bay on Ingram Street, rather than using the existing Metropolitan Transit System (MTS)/San Diego Northern Railway (SDNR) right-of-way.

8.3.3.3 Light Rail Transit Stations

Thirty-four of the comment submissions discussed stations. Many supported proposed station locations. Others suggested either eliminating or adding stations. The Executive Drive, UCSD West, and Clairemont Drive Stations were suggested for elimination. Additional stations were suggested for State Route 52 (SR 52), Gilman Drive, Jutland Drive, and the VA Medical Center. Seven comment submissions supported a station at the VA Medical Center and the SR 52, Gilman Drive, and Jutland Drive locations were each identified as potential station locations in two submissions.

Other comments related to stations included providing good non-motorized transportation access, good bus connections, park-and-ride facilities, secure bike parking, and a design that supports redevelopment in station vicinities. One comment suggested a major roadway grade-separated connection from Grand Avenue to Morena Boulevard near the Balboa Avenue Station. Increased crime and public safety near stations also was identified as a concern.

8.3.4 Comments Related to Evaluation

Five comments related to the evaluation of the alternatives. The comments requested additional details on how the preliminary analysis was completed and the process used by the Federal Transit Administration (FTA) to evaluate New Starts projects. There were requests to change the presentation of findings, including using highly detailed maps for planning-level analysis. One comment requested that the SEIS/SEIR evaluate the competitiveness of transit travel times to drive times, another indicated concern that standard FTA user benefit calculations over-estimate the effect of transfers. One comment noted the need for complete documentation of travel forecasting methods and assumptions.

8.3.5 Costs and Funding

Twenty-four submissions included comments related to costs and funding. Several comments observed cost differences between the alternatives evaluated. Multiple comments suggested reduced-rate or free fares. Highway and other funds were suggested to be redirected to transit. Other comments requested that no University of California funds be used to support the project and that the dedicated *TransNet* funds be redirected to other transit improvements. Other comments were concerned with the long-term project costs, considering the current economic recession. One recommendation was to accelerate the project to seek Federal funds earlier.

8.3.6 Comments Related to the Environmental Impacts Analyses

Sixty-eight comment submissions included comments related to the topics listed below.

8.3.6.1 Traffic and Parking

Twenty-two comments were related to traffic and parking effects during construction and operation. Comments noted the need for park-and-ride facilities to serve local demand and to intercept southbound I-5 traffic. Some comments stated that students and workers already park in residential neighborhoods and take transit to their destinations; and they were concerned that the project would increase this occurrence. Several comments related to how the system will integrate with and affect the existing bus system.

Traffic concerns included increased general traffic and congestion, loss of travel lanes, the need for transit signal priority for transit, conflicts between transit and roadway traffic in the UCSD area, and increased traffic around stations. One comment noted that local street infrastructure needs should be determined prior to selection of alternatives. Also, the need for an interface with Caltrans and project coordination with other transportation projects was noted. Comments noted that mitigation needs to be considered to facilities where the project would result in an impact.

8.3.6.2 Non-motorized Transportation

Numerous comments were related to providing good pedestrian and bicycle access to the stations. Other comments requested recreational trail improvements near the project.

8.3.6.3 Land Use

Land use comments included concerns with density, if it would be sufficient to support the system, and recommendations to consider transit-oriented development (TOD) potential. One comment noted an “urban farm” at UCSD for consideration during evaluation. One comment stated that general plan and municipal code requirements should be reviewed and any planned smart-growth centers should be identified.

8.3.6.4 Neighborhoods

Neighborhood concerns included parking pressure from residents outside of the neighborhoods using the system, and an increase in neighborhood crime.



8.3.6.5 Safety and Security

One comment requested analyzing any correlation between transit and crime and noted the San Diego Police Department's large coverage area. Safety concerns about at-grade pedestrian track crossings, especially by students in the UCSD and University City areas also were noted.

8.3.6.6 Economic Development

Comments on economic development were related to redevelopment of areas around stations. One comment noted that the long-term economic benefits of transit should be presented.

8.3.6.7 Right-of-Way Acquisitions and Relocations

Opposition was voiced to the acquisition of parkland for the project.

8.3.6.8 Environmental Justice

Comments included the need to consider transit access for and impacts to low-income and minority populations. One comment noted that the SEIS/SEIR should identify whether the proposed alternatives may disproportionately and/or adversely affect low-income or minority populations and document the process for community involvement.

8.3.6.9 Visual

Comments included a request for renderings showing how the project will look in the UCSD area and lighting effects on surrounding uses, including wildlife. One comment related to visual effects of vehicles, guideway infrastructure, and stations and mitigation of effects on views from commercial and residential properties.

8.3.6.10 Air Quality

One comment noted that the project would help reduce greenhouse gas emissions. The project is located in an ozone nonattainment and a carbon monoxide maintenance area. One comment noted that mobile source air toxins should be addressed.

8.3.6.11 Geology

One comment was received on the need to study fault crossings near proposed major structures. An assessment of the potential for earthquakes and the extent of damage to structures also was requested. Another comment was received on what other hazards would be studied and what mitigation would be required.

8.3.6.12 Noise and Vibration

Several comments were related to the noise and vibration analyses. An explanation of acoustics science was requested. Other requests included measuring existing levels, and evaluating construction and future project noise generation to interior and exterior areas, including wheel squeal, track maintenance effects, and cumulative effects for at-grade and elevated guideway sections and for supporting facilities. The Balboa/Morena, La Jolla Colony, La Jolla Village Square, and University City areas were areas of concern and noise effects on wildlife in open-space areas was also a concern. Other comments were related to bus and road noise from other projects.

8.3.6.13 Solid Waste and Hazardous Materials

An analysis of solid waste impacts was requested. One comment asked that the project consider green infrastructure and material reuse and recycling. One comment requested evaluating toxins and human health impacts.

8.3.6.14 Ecosystems

Comments noted a need to evaluate the project as a barrier to wildlife, especially if fencing is introduced. The evaluation of habitat loss, lighting, and noise effects on wildlife was requested. One comment noted a concern that invasive species could be introduced by Trolley operations. Potential mitigation sites were noted in the Rose Creek Watershed Opportunities Assessment, if the project would result in impacts that would require mitigation. The analysis of potential temporary and long-term impacts to Least Bell's Vireo was requested.

8.3.6.15 Water Resources

Comments identified concerns with flood control, hydrology, runoff from on-site contamination, water supply, and hydraulic modeling. A stormwater impacts analysis was requested. Comments stated that functional conditions of waters and riparian areas should be evaluated. One comment noted that Section 404 of the Clean Water Act will be applicable to the project and that measures to avoid, minimize, and mitigate impacts to waters should be incorporated into the project.

8.3.6.16 Parks

A total of 109 comment submissions, more than for any other environmental topic, were related to parks and parklands. The comments focused on protecting and analyzing potential effects on Mandell-Weiss Eastgate City Park, Marian Bear Memorial Park, and Rose Canyon Open Space Park. Comments noted a need to address project compatibility with relevant park plans, including the Marian Bear Memorial Park Natural Resources Management Plan, the San Diego River Master Plan, and the Rose Creek Watershed Opportunities Assessment. Several comments were related to existing uses of, and resources within, the parks, including the current frequent practice of accessing the parks by illegal trespass and crossing of the existing MTS/SDNR right-of-way. Opposition to the use of the parkland was noted. The potential to affect the Mission Valley Preserve was also noted.

8.3.6.17 Historic/Cultural Resources

The Native American Heritage Commission identified Native American cultural resources within the Area of Potential Effect (APE) for the project and commented that cultural landscapes should be considered along with other resources evaluated. Avoiding significant cultural resources, when discovered during project planning and implementation, also was suggested.

8.3.6.18 Construction Impacts

Several comments noted that construction effects related to traffic, noise, access, water quality, and jobs should be evaluated.

8.3.6.19 Indirect and Cumulative Effects

Comments identified a need to consider the cumulative effects of various planned projects, including the planned I-5 improvements, on the environmental topics discussed



above. One comment suggested that previous comments on the “UC North/South Transportation Corridor Project EIR” should be reviewed.

8.4 Analysis of Scoping Comments

All comments received during scoping were reviewed and considered. The comments related to the scope of the Draft SEIS/SEIR, including purpose and need, evaluation process, costs and funding, and environmental impacts will be addressed in the Draft SEIS/SEIR. The comments related to alternatives under consideration are addressed in this *Final Comparative Evaluation of Alternatives Report*. The comments included a request to evaluate a BRT alternative in the Draft SEIS/SEIR and comments on LRT alignments and station locations. Following are the responses to the comments related to alternatives.

8.4.1 Bus Rapid Transit

Comments were received on the need to include a BRT alternative in the Draft SEIS/SEIR. BRT was evaluated in the *Draft Comparative Evaluation of Alternatives Report* and the SANDAG Board eliminated it as an alternative for scoping at their April 23, 2010 meeting. The SANDAG Board decision was based on the SANDAG staff recommendation and findings that the BRT alternatives evaluated were less effective than the LRT alternatives in improving mobility and accessibility and are also less cost effective and financially feasible than the LRT alternatives. BRT also was evaluated in the *Mid-Coast Light Rail Transit Extension Locally Preferred Alternative Update Summary* (SANDAG 2004b), which concluded that LRT was more appropriate for the Mid-Coast Corridor. The *Draft Comparative Evaluation of Alternatives Report* findings support the prior decision and do not indicate that changed conditions would alter the prior decision. Thus, BRT has been eliminated from further consideration in the Draft SEIS/SEIR.

8.4.2 Light Rail Transit Alignments

Several comments included new LRT alignment options for consideration. The alternatives, including recommendations to carry them forward or eliminate them from further consideration, are discussed below.

- **Proposed design option to LRT Alternative 1, with an I-5 crossing at Gilman Drive and a station at the VA Medical Center** – This proposed design option to LRT Alternative 1, with a station near the UCSD West Campus just east of the VA Medical Center, is the alignment adopted as the Locally Preferred Alternative (LPA) in 1995. Alternative alignments to the LPA and alternative station locations at the VA Medical Center and in Pepper Canyon on the UCSD West Campus were previously evaluated in the *Mid-Coast Corridor UCSD Alignment Evaluation* (MTDB 2000). The Metropolitan Transit Development Board concluded that the alignments with a station in Pepper Canyon on the UCSD West Campus should be advanced for further consideration and the alignments with a station at the VA Medical Center should be eliminated. In 2004, the SANDAG Board adopted an LPA that refined the 1995 LPA with an alignment along Voigt Drive and a station in Pepper Canyon. This station location is consistent with the UCSD *Long Range Development Plan* (UCSD 2004a) and is included in the *University Center/Six College Neighborhood Planning Study*

(UCSD 2004b) adopted by UCSD in 2004. LRT Alternative 1 includes the following design measures to minimize impacts to UCSD: a below-grade alignment at Gilman Drive, an at-grade or grade separated alignment in the vicinity of the Gilman Drive/Voigt Drive intersection, and an above-grade alignment or below-grade alignment to avoid possible impacts to existing and planned sports facilities east of I-5. As a result of these considerations, the proposed alignment option is recommended for elimination as an alternative for further consideration. The addition of a station at the VA Medical Center is addressed separately under the Light Rail Transit Stations section.

- **Proposed alternative to terminate the LRT line in the vicinity of the Gilman Drive/Voigt Drive intersection and construct a separate dedicated right-of way circulator loop for rubber-tired transit that would connect UCSD, UTC, and the COASTER Sorrento Valley Station** – This proposed alternative (referenced by the commenter as the Blue and Gold Alternatives) would provide LRT service to a terminus station on the UCSD West Campus. It would then use a rubber-tired transit circulator system to provide connecting service via an exclusive guideway instead of mixed-traffic operations to UTC and the COASTER Sorrento Valley Station. The proposed alternative does not meet the project purpose and need because it does not provide direct service to the UCSD East Campus or UTC. The alternative requires a transfer from the LRT system to the transit circulator system. The existing *SuperLoop* service, which is planned for upgrade and expansion, includes transit priority at intersections and provides some of the benefits of the proposed alternative for the area south of Voigt Drive. While the proposed exclusive right-of-way loop for local transit service would provide connectivity benefits in the UCSD and UTC communities, it would require using open space and constructing elevated structures through the UCSD campus, which would be larger and more extensive than those proposed as part of some of the LRT alternatives. Furthermore, the exclusive right-of-way loop would be considered a separate project outside the Mid-Coast Corridor Project purpose and need. As a result, the proposed alternative is recommended for elimination from further consideration.
- **Proposed alternative to follow LRT Alternative 1, but extend north from the UCSD West Station through UCSD Park to Genesee Avenue** – This alternative proposed a station and parking facility on Genesee Avenue west of I-5 to accommodate vehicles on southbound I-5. The alternative also proposed alignment variations branching off the main alignment for service to the Sorrento Valley COASTER Station. The LPA the SANDAG Board adopted in 2003 provides for improving transit service to University City. The analysis of changed conditions did not identify a need to extend the project limits to the north of University City because a future extension to the north of University City is included as a separate project in the Reasonably Expected Revenue Scenario of the *2030 San Diego Regional Transportation Plan: Pathways for the Future* (RTP) (SANDAG 2007). Furthermore, the project travel market analysis did not identify the area north of University City as a major travel market for the project. Extending the project north from the UCSD West Station to Genesee Avenue would require use of land from the UCSD Park. UCSD Park is identified in the *UCSD Long Range Development Plan* (UCSD 2004a) and is comprised of ecological reserve, grove reserve, and restoration land areas. The canyons north of Voigt Drive lie within an ecological reserve area. The UCSD



Long Range Development Plan identifies the ecological reserve resources within the park as being biologically sensitive, further stating that no buildings, roads, or driveways are permitted in such areas of the park. As such, the alternative would require using a resource protected by Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966, Title 49 U.S. Code (now 23 CFR 774). Such use is only permitted if there is no feasible and prudent alternative to the use. Secondly, the proposed alternative would add almost a mile of alignment, including substantial tunnel sections and elevated structure. As a result, the proposed alternative is recommended for elimination from further consideration.

- **Proposed alternative to serve Pacific Beach by crossing Mission Bay on Ingram Street rather than using the existing MTS/SDNR right-of-way** – This alternative proposes an alternative alignment to using the existing MTS/SDNR right-of-way and service to Pacific Beach instead of Clairemont. Because there is no existing available right-of-way, the proposed LRT alignment would have to be constructed across Mission Bay on an elevated structure for approximately 3 miles. Compared to using the MTS/SDNR right-of-way under the LRT Alternatives 1, 3, and 6, this alternative would result in additional impacts to Mission Bay Park, the San Diego River, and the surrounding residential neighborhoods. The alternative would also increase the project cost. As a result, the proposed alternative is recommended for elimination from further consideration.

8.4.3 Light Rail Transit Stations

In addition to comments recommending LRT alignments for consideration, stations at SR 52, Gilman Drive, Jutland Drive, and the VA Medical Center were identified for consideration.

Adding a station at SR 52 was proposed; however, there would be no walk access to the station because all development within one-half mile of the station would have restricted access because of the area topography. Open space near SR 52 is parkland and any non *de minimis* use is precluded by Section 4(f), unless there is no feasible and prudent alternative. Therefore, it would not be possible to construct a park-and-ride in the area to serve auto commuters. Because of grade differences, it would be difficult to serve a station with buses at this location. Bus service would require widening the freeway ramp structures to provide bus stops that would be connected by elevators and stairs to a station below the ramps. Because the stops would be on freeway ramps, it would not be possible to turn-around bus service at the station. For these reasons, the proposed station location is not recommended for further consideration.

Stations at Jutland Drive and Gilman Drive were previously considered in the *Mid-Coast Corridor Alternatives Analysis/Draft Environmental Impact Statement/Draft Environmental Impact Report* (MTDB 1995). The SANDAG Board's adoption of the LPA in 2003 resulted in these stations being eliminated. Pages 20 to 22 of the *Mid-Coast Light Rail Transit Extension Locally Preferred Alternative Update Summary* identified the changed station locations between the 1995 and 2003 LPA decisions. Because there has been no change in land use or development that would change the conditions under which they were eliminated, the stations at Jutland Drive and Gilman Drive are not recommended for further consideration.



As identified above in the alternative alignments discussion, an alternative station location at VA Medical Center was identified for consideration. Although alternative alignments to the current LPA and an alternative station location at the VA Medical Center were previously evaluated in the *Mid-Coast Corridor UCSD Alignment Evaluation* (MTDB 2000) and eliminated in favor of a station location in Pepper Canyon on the UCSD West Campus, the VA Medical Center Station was not evaluated as an additional station with the UCSD West Station. Therefore, it is recommended that a station location at the VA Medical Center be considered during preparation of the Draft SEIS/SEIR.