

Appendix E

Responses to Comments on Draft Mitigated Negative Declaration

The Draft Mitigated Negative Declaration (Draft MND) for the Downtown San Diego Bus Rapid Transit (BRT) Stations Project was distributed for public review on June 10, 2013, initiating a 30-day public review period ending on July 9, 2013. The document was made available online, at public libraries in the project area, and at SANDAG's office. A total of approximately 34 letters and emails were received before the close of the public comment period. After the close of the public comment period, approximately 2 more letters were submitted. Pursuant to California Environmental Quality Act (CEQA) Guidelines §15088(a), "the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response." All comment letters received on the Draft MND, including the letters received after the close of the public comment period, were evaluated for environmental issues, and written responses to comments on environmental issues were prepared.

Table 1 provides a list of the comment letters received, including details on the agency, organization, or individual that submitted the letter and the date of the letter. This appendix presents written responses to comments on environmental issues raised in these letters. The written responses describe the disposition of significant environmental issues raised, as required by CEQA Guidelines §15088(c).

Table 1
Comment Letters on Draft Mitigated Negative Declaration for the
Downtown San Diego Bus Rapid Transit Stations Project

Letter Number	Public Agency, Organization, or Individual	Date of Letter
1	California Public Utilities Commission	July 8, 2013
2	Native American Heritage Commission	June 14, 2013
3	State Clearinghouse	July 10, 2013
4	TREO Board of Directors	July 7, 2013
5	Anne MacMillan Eichman	July 3, 2013
6	Bahareh Feli	July 7, 2013
7	Betty Callan	July 9, 2013
8	Carol Spangenburg	June 24, 2013
9	Derek Hook	June 19, 2013
10	Hamid Bagheri	July 2, 2013
11	Jake Bommerin	July 2, 2013
12	Jim Gregg	June 17, 2013
13	Jim Gregg	July 7, 2013
14	Joan Van Der Hoeven	June 19, 2013
15	Kevin Lehman	June 19, 2013
16	Khoa Nguyen, on behalf of Sofia Hotel	July 9, 2013
17	Leilani Vigil	June 19, 2013
18	Leslie Henshaw	June 19, 2013
19	Mahbod Cyrus Rashidi	July 7, 2013
20	Mark Eichman	July 4, 2013
21	Michael Chua	June 19, 2013
22	Michael Herbert	June 12, 2013
23	Myron Newton	June 19, 2013
24	Nancy Coleman	June 19, 2013
25	Nazanine Espahbodi	July 4, 2013

Table 1
Comment Letters on Draft Mitigated Negative Declaration for the
Downtown San Diego Bus Rapid Transit Stations Project

Letter Number	Public Agency, Organization, or Individual	Date of Letter
26	Polly Gillette	June 19, 2013
27	Polly Gillette	June 19, 2013
28	Richard Pincus	July 2, 2013
29	Sharon Blasgen	July 6, 2013
30	Stacey Miller	July 19, 2013
31	Tanya Reid	June 19, 2013
32	Tim Hull	June 18, 2013
33	Veronica D'Annibale	June 19, 2013
34	Vicki Hoppenrath	June 19, 2013
35	Walter Scott Chambers III	June 17, 2013
36	Wendy Reuben	July 7, 2013

MASTER RESPONSES TO COMMENTS

Common themes were repeated throughout many of the comment letters listed in Table 1. Two Master Responses have been developed to respond to these common themes: Master Response 1 addresses comments related to the project description, and Master Response 2 addresses comments related to property values. For efficiency, the text for each Master Response is provided here for ease of reference instead of repeating text for each individual comment received. Individual comments that are addressed by these Master Responses are referred to by the numbered code (e.g., "Please refer to Master Response 1"). All references to section numbers in the Master Responses are from the *Guidelines for Implementation of the California Environmental Quality Act, Cal. Code Regs. tit. 14, §15000 et seq.* ("CEQA Guidelines") unless otherwise noted.

Master Response 1 – Project Description

Several comments received on the Draft MND incorrectly ascribe features and characteristics to the proposed project that are not in fact a part of the proposed project as described in the Draft MND. There are comments that the proposed project would lead to increased bus operations in the project area, and lead to the construction and operation of a bus terminal or bus parking lot (also called a layover facility) in the project area. There are comments that these features and characteristics would lead to various adverse effects on the environment (e.g., traffic congestion, pedestrian safety, aesthetics).

As described in Section 2.0 Project Description of the Draft MND, SANDAG proposes to construct seven new bus rapid transit (BRT) stations and related physical improvements within public right-of-way in Downtown San Diego ("the proposed project"). The primary purpose of the proposed project is to enhance pedestrian access to multiple approved BRT services, including South Bay BRT,¹ Mid-City Rapid,² and I-15 BRT.³

Independent of the proposed project, the seven station locations would be served by multiple approved BRT services. These BRT services, including the operation of buses in the area of the proposed project, will occur with or without implementation of the proposed project. The location at which buses stop for passenger pick-up and drop-off will not change with or without

¹ <http://www.sandag.org/index.asp?projectid=297&fuseaction=projects.detail>

² <http://www.sandag.org/index.asp?projectid=317&fuseaction=projects.detail>

³ <http://www.sandag.org/index.asp?projectid=393&fuseaction=projects.detail>

implementation of the proposed project. The potential environmental impacts of each of these services were identified in CEQA-compliant documents certified and adopted by SANDAG.

Also independent of the proposed project, SANDAG is exploring the possibility of developing a proposed layover facility, which could include the combination of a layover facility for MTS buses (including buses operating for the South Bay BRT, Mid-City Rapid, and I-15 BRT) with mixed-use development for SANDAG offices, potential retail, or potential residential development. As directed by a vote of the SANDAG Board of Directors at its June 28, 2013, meeting, SANDAG staff is currently studying the feasibility of a bus layover facility that includes mixed-use development. Before considering whether or not to construct a bus layover facility, the SANDAG Board of Directors would first be required to comply with CEQA. Basic information about a potential bus layover facility, such as its location and potential inclusion of mixed-use development, is not known at this time.

No features or characteristics of the proposed project would directly or indirectly lead to the operation of buses or to the construction and operation of a bus layover facility. The proposed project does not meet the criteria for piecemealing established by the California Supreme Court: (1) neither the operation of buses nor the construction and operation of a bus layover facility would be a reasonably foreseeable consequence of the proposed project; and (2) potential future construction of a bus layover facility would not change the scope or nature of the proposed project or its environmental effects.⁴ The approved BRT services, the proposed project, and a potential future bus layover facility are stand-alone projects that could each be implemented independently.

The Draft MND analyzes the potential environmental effects of the proposed project as required by CEQA, and is not required to identify the environmental effects of independent projects that have already been approved or independent projects that may or may not occur in the future.

Master Response 2 – Property Values

As required by CEQA, the focus of the Draft MND analysis is on the physical changes to the environment as a result of the proposed project (§15131[a]). Under CEQA, purely economic and social effects of a project, such as the impact of a project on adjacent or nearby property values, without a physical change in the environment, shall not be treated as significant effects on the environment (§15131[a]). None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e])⁵ that there will be physical impacts to the environment as a result of a decline in property values occurring as a result of the project.

In addition to not being required by CEQA, any attempt by SANDAG to estimate the impact of the proposed project on property values would be speculation. In light of the numerous factors affecting real estate prices, it is not possible for SANDAG to provide a realistic and reliable prediction of changes in future property values in the project area based on their proximity to the proposed project. However, comments expressing concern with the potential for the project to decrease property values will be included in public record for the project, and along with other economic, social, technological and environmental factors, will be considered by SANDAG in making a decision on the project.

⁴ *Laurel Heights Improvement Association v. Regents of University of California* (1988) 47 Cal.3d 376

⁵ As used herein, “‘substantial evidence’ is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment” (Public Resources Code §21080[e]).

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

EDMUND G. BROWN JR., Governor



Letter 1
California Public Utilities Commission

July 8, 2013

Andrew Martin
401 B Street, Suite 800
San Diego, CA 92101

SENT VIA EMAIL ON JULY 8, 2013 TO andrew.martin@sandag.org

Dear Mr. Martin:

SUBJECT: SCH# 2013061017; Downtown San Diego Bus Rapid Transit Stations

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) and rail transit projects in California. The California Public Utilities Code requires Commission approval for construction or alteration of crossings and grants the Commission exclusive power on design, alteration, and/or closure of crossings in California. The Commission's Rail Crossings Engineering Section (RCES) reviews crossing matters. The Commission has received a copy of the *Initial Study / Mitigated Negative Declaration (MND)* from the State Clearinghouse for the proposed Downtown San Diego Bus Rapid Transit Stations in City of San Diego. SANDAG is the lead agency.

1-1

According to the MND and supporting documentation, the project to support Bus Rapid Transit (BRT) would include construction of \$24 million in upgrades to the streetscape, including widening sidewalks for pedestrians and constructing BRT stations at a number of locations in the vicinity of Broadway between Kettner Blvd. and Park Blvd.

Potential impacts to the safety of rail crossings should be closely reviewed. There appear to be proposed changes to markings, paving and sidewalks in the vicinity of 3 existing light-rail transit crossings:

- Kettner Blvd. north of Broadway
- India St. north of Broadway
- Park Blvd. at Broadway

1-2

The IS/MND section for "Other Agency Permits and Approvals" does not list CPUC as a permitting authority regarding changes at rail crossings. The project should ensure that changes at or in the immediate vicinity of rail crossings are reviewed with CPUC and SDTI staff regarding potential safety issues. Significant modification of existing rail crossings would typically be authorized through the CPUC's GO 88-B process.

1-1

These introductory comments and description of the project are noted. No further response is required.

1-2

SANDAG acknowledges that the proposed project would occur in the vicinity of the three existing light-rail crossings identified in this comment. However, the proposed project would not involve significant modification of existing rail crossings and therefore authorization through the CPUC GO 88-B process is not anticipated to be required for the proposed project.

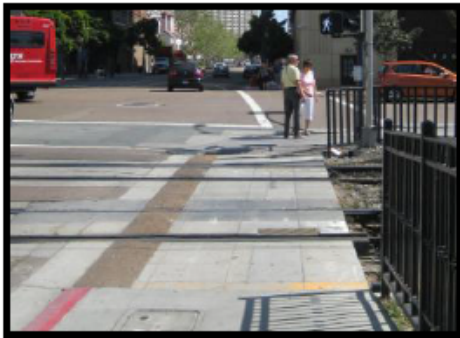
Andrew Martin, SANDAG
CPUC Comments on Downtown San Diego Bus Rapid Transit Stations
Page 2 of 3
July 8, 2013

The IS/MND includes a number of references to lane closures and detours during construction. The Temporary Traffic Control plans should be reviewed for potential safety impacts to both light rail transit and railroad crossings. A recent inspection at the mainline railroad tracks on Broadway showed that Temporary Traffic Control (TTC) was improperly placed resulting in a merge within the track area and vehicles stopping on the tracks. Refer to 2012 CA MUTCD Figure 6H-46 for appropriate TTC in the vicinity of rail crossings.



Improper TTC at Broadway railroad crossing, May 9, 2013

The IS/MND indicates that sidewalks may be modified in a number of locations. Where this occurs in the vicinity of a rail crossing, detectable warning should be installed on each approach to the tracks.



Detectable warning needed on sidewalk approaches to tracks at Kettner near Broadway

1-3

This comment is noted. Temporary traffic control plans prepared for construction of the proposed project will comply with applicable requirements for Temporary Traffic Control in the vicinity of rail crossings.

1-3

1-4

Detectable warning (truncated domes) are proposed at the north sidewalk on Kettner Boulevard and the railroad tracks. Existing truncated domes will be perpetuated at the south sidewalk of India Street and the railroad tracks. Existing curb ramp truncated domes will be perpetuated at Broadway and the railroad tracks.

1-4

Andrew Martin, SANDAG
CPUC Comments on Downtown San Diego Bus Rapid Transit Stations
Page 3 of 3
July 8, 2013

The following link provides more information on the Commission's rules and regulations regard to rail crossing safety:

<http://www.cpuc.ca.gov/crossings/>

Please feel free to contact me at kevin.schumacher@cpuc.ca.gov or (415) 310-9807.

Sincerely,

Kevin Schumacher

Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division

cc: State Clearinghouse

I-5

This comment is noted. No further response is required.

1-5

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

June 14, 2013

Mr. Andrew Martin, Project Planner

San Diego Association of Governments (SANDAG)

401 B Street, Suite 800
San Diego, CA 9210-1

RE: SCH# 2013061017 CEQA Notice of Completion; proposed Mitigated Negative Declaration for the **Downtown San Diego Bus Rapid Transit Stations Project**; located in Downtown San Diego; San Diego County, California.

Dear Mr. Martin:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine if a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s). The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR). This area is known to the NAHC to be very culturally sensitive.

If an additional 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. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers 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 pursuant to California Government Code Section 6254.10. Contact has been made to the Native American Heritage Commission for a Sacred Lands File Check. A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine

**Letter 2
Native American Heritage Commission**

2-1

As discussed in Section 7.5 of the Draft MND, SANDAG commissioned a records and literature search of the California Historical Resources Information System at the South Coastal Information Center at San Diego State University (provided in Appendix B of the Draft MND). The search identified four historical resources in the project area, and the Draft MND explains that the proposed project would not cause a substantial adverse change in the significance of any of the identified historical resources.

The search also indicated that there is a low likelihood of encountering unknown buried resources during construction of the proposed project because the depth of below grade disturbance associated with the proposed project would not be expected to exceed the depth of previous disturbance associated with past construction activities, such as roadway construction and utility installation. As-built construction documents show existing below grade utilities in the project area. Installation of utilities and other past construction activities would have required excavation of earthen materials, and as a result, likely would have removed or destroyed any undiscovered buried resources.

2-1

However, SANDAG acknowledges the possibility that unknown buried archaeological resources could be present in the Gaslamp Quarter Historic District and within the sidewalk along the west side of Kettner Boulevard adjacent to Santa Fe Depot. To ensure the project would not cause a substantial adverse change in the significance of an archaeological resource that could be encountered during construction, the Draft MND requires implementation of mitigation measures CULTURAL-1, which mandates archaeological monitoring of any trenching, excavation, or grading within the boundaries of the Gaslamp Quarter Historic District and within the existing sidewalk along the west side of Kettner Boulevard adjacent to the Santa Fe Depot property.

if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst
(916) 653-6251

CC: State Clearinghouse

Attachment: Native American Contacts list

2-1
(cont.)

Section 7.5 (d) of the Draft MND explains that SANDAG shall follow the procedures required by state law for the accidental discovery of human remains, including those set forth in Public Resources Code §5097.98 and Health and Safety Code §7050.5).

**Native American Contacts
San Diego County
June 14, 2013**

Barona Group of the Capitan Grande
Clifford LaChappa, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612
619-443-0681

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
ssilva@sycuan-nsn.gov
619 445-2613
619 445-1927 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
619-478-2125

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
PO Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
PO Box 1302 Diegueno/Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center, CA 92082
allenl@sanpasqualband.com
(760) 749-3200
(760) 749-3876 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013061017; CEQA Notice of Completion; proposed Mitigated Negative Declaration for the Downtown San Diego Bus Rapid Transit Stations Project; located in Downtown San Diego; San Diego County, California.

**Native American Contacts
San Diego County
June 14, 2013**

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul, CA 91935
jamulrez@sctdv.net
(619) 669-4785
(619) 669-48178 - Fax

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside, CA 92040
sbanegas50@gmail.com
(619) 742-5587
(619) 443-0681 FAX

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270 Diegueno
Santa Ysabel, CA 92070
mesagrandeband@msn.com
(760) 782-3818
(760) 782-9092 Fax

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, cultural Resources
P.O. Box 908 Diegueno/Kumeyaay
Alpine, CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno -
Pine Valley, CA 91962
(619) 709-4207

Ewilaapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine, CA 91901
wmicklin@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Inaja Band of Mission Indians
Rebecca Osuna, Chairman
2005 S. Escondido Blvd. Diegueno
Escondido, CA 92025
(760) 737-7628
(760) 747-8568 Fax

Ipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
cjlinton73@aol.com
(760) 803-5694
cjlinton73@aol.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013061017; CEQA Notice of Completion; proposed Mitigated Negative Declaration for the Downtown San Diego Bus Rapid Transit Stations Project; located in Downtown San Diego; San Diego County, California.

**Native American Contacts
San Diego County
June 14, 2013**

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaypaay Court Diegueno/Kumeyaay
El Cajon , CA 91919
(619) 445-0238 - FAX
(619) 659-1008 - Office
kimbactad@gmail.com

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator; Viejas THPO
240 Brown Road Diegueno/Kumeyaay
Alpine , CA 91901
fbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
(619) 478-2113
(KCRC is a Coalitoun of 12
Kumeyaay Governments)
bp@lapostatribes.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013061017; CEQA Notice of Completion; proposed Mitigated Negative Declaration for the Downtown San Diego Bus Rapid Transit Stations Project; located in Downtown San Diego; San Diego County, California.

Letter 3
State Clearinghouse



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

July 10, 2013

Andrew Martin
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Subject: Downtown San Diego Bus Rapid Transit Stations
SCH#: 2013061017

Dear Andrew Martin:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 9, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

3-1
This comment is noted.

3-1

Document Details Report
State Clearinghouse Data Base

SCH# 2013061017
Project Title Downtown San Diego Bus Rapid Transit Stations
Lead Agency San Diego Association of Governments

Type MND Mitigated Negative Declaration
Description All bus shelters would be approximately 10 feet tall with a rectangular glass panel roof atop two columns, both two feet wide. Lighting would run vertically along column edges. All pylons would be approximately 15 feet tall and 3.5 feet wide. Pylons would be 11 inches wide and taper down to six inches. Lighting would run vertically along the pylon edge. Security cameras would be installed in pylons.

Lead Agency Contact
Name Andrew Martin
Agency San Diego Association of Governments
Phone 619 595 5375 **Fax**
email
Address 401 B-Street, Suite 800
City San Diego **State** CA **Zip** 92101

Project Location
County San Diego
City San Diego
Region
Lat / Long
Cross Streets Area bounded by Broadway (S), B St. (N), Park Blvd (E), Ketter Blvd (W)
Parcel No. primarily public rights-of-way
Township **Range** **Section** **Base**

Proximity to:
Highways SR 163, 94 & I-5
Airports San Diego International
Railways AT&SF (MTS)
Waterways San Diego Bay
Schools Multiple
Land Use Project occurs on public rights-of-way (e.g., sidewalks, roadways).

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Geologic/Seismic; Noise; Public Services; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission

Date Received 06/10/2013 **Start of Review** 06/10/2013 **End of Review** 07/09/2013

Letter 4
TREO Board of Directors

From: [Michele](#)
To: [Martin, Andrew](#)
Cc: treo92101@gmail.com
Subject: July 3, 2013 - Letter from TREO HOA re: Downtown San Diego BRT Transit Stations: Draft Mitigated Negative Declaration
Date: Sunday, July 07, 2013 12:18:19 PM
Attachments: [Draft EIR Bus Stations - July 3 2013 Treo HOA Comment Letter.pdf](#)

Dear Andrew:

Please accept the TREO Board of Directors Comments, in the attached letter, with regards to:
---- The Draft Mitigated Negative Declaration, Downtown San Diego BRT Transit Stations ----

I will personally bring the Signed Original Letter to the Sandag office on Monday July 8, 2013.

Respectfully submitted,
Michele Addington
1277 Kettner Blvd 412
San Diego CA 92101
858-334-8019

4-1

Responses to the specific comments are provided below.

4-1



Treo @ Kettner HOA
 1240 India Street
 San Diego, CA 92101
 Phone: (619) 231-4315
 Email: Treo@actionlife.com

Andrew Martin
 SANDAG
 401 B Street, Ste. 800
 San Diego, CA 92101
 andrew.martin@sandag.org

Subject: Downtown San Diego Bus Rapid Transit Stations: Draft Mitigated Negative Declaration

The purpose of this letter is to address our primary concerns about the proposed San Diego Bus Rapid Transit Stations and the Draft Mitigated Negative Declaration. These concerns are detailed below.

CEQA

The subject of the draft mitigated negative declaration (MND) is not a stand alone project. It has been described as part of the Regional Transportation Plan, for which an environmental impact report (EIR) was prepared and certified but subsequently decertified by a court of law. [Cleveland Nat'l Forest Foundation, et al v. San Diego Ass'n of Governments]

SANDAG has appealed the court's decision, but unless and until the court's decision is overruled, there is no certified EIR on which this MND can be based. Submitting this BRT segment for approval under an MND is an example of the piecemealing that is not allowed.

DOWNTOWN COMMUNITY PLAN

The Downtown San Diego Rapid Transit Stations Fact Sheet refers to the adopted Centre City Community Plan, implying that the proposed BRT stations are consistent with that plan. This is blatantly misleading.

The Downtown Community Plan recognizes that "BRT is a new philosophy in bus travel being pursued by SANDAG." The Plan, however, focuses on an internal shuttle, stating, "The development of an intra-downtown shuttle has been consistently cited as a desire by the downtown community."

The Plan's Transit System Policy 7.3-P-3 states, "Coordinate with the transit agency and other appropriate organizations to implement:

"Internal shuttle service for local trips, connecting key downtown locations with the wider transit network, and using smaller, cleaner vehicles for flexible neighborhood trips.

"BRT service, improving the commuter and long-distance transit network with state-of-the-art technology to provide more frequent and faster trips.

"Bus service modifications to improve service, and to increase transit accessibility when the internal shuttle and BRT services begin."

The Downtown San Diego Partnership is currently working on the implementation of a downtown shuttle service as advocated by the Plan. The Plan envisages BRT buses connecting with the downtown shuttle service, at the edge of downtown, not duplicating it by traveling into the downtown neighborhoods.

4-2

The comment that the Draft MND is based on the EIR for the 2050 RTP/SCS is incorrect. The draft MND that was prepared for the proposed project does not tier off of, or rely on the EIR that was certified by the SANDAG Board of Directors for the 2050 RTP/SCS. While that EIR for the 2050 RTP/SCS was found deficient by the Superior Court of San Diego County, an appeal in that case was filed which suspends the Superior Court ruling until the Appeals Court hears the case. Regardless of the outcome of that case, the Downtown San Diego BRT Stations MND is an independent document that does not in any way rely on the EIR prepared for the 2050 RTP/SCS. Please see Master Response 1 which further explains that the proposed project is a stand-alone, independent project.

4-2

4-3

The proposed project would install features such as bus shelters, pylons, street trees, pedestrian lighting, new crosswalk striping and wider sidewalks to improve pedestrian access to approved rapid bus services. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e])⁶ that the proposed project would result in a conflict with the policies identified in this comment, or any policies or regulations of the Downtown Community Plan or Centre City Planned District Ordinance. Nothing about the proposed project would conflict with or impede the potential future implementation of an internal downtown shuttle service. Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project.

4-3

⁶ As used herein, "'substantial evidence' is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment" (Public Resources Code §21080[e]).



Treo @ Kettner HOA
 1240 India Street
 San Diego, CA 92101
 Phone: (619) 231-4315
 Email: Treo@actionlife.com

SPECIFIC ISSUES

BRT Buses and Transit Stations on Broadway

Throughout the Downtown Community Plan there is emphasis on walkability and active streetlife. The BRT proposal would adversely impact the walkability and liveliness of Broadway by imposing large BRT bus stations and other changes along Broadway that would assert SANDAG's vision of Broadway, not the vision of the adopted Downtown Community Plan.

4-4

BRT Buses and Transit Stations on India and Kettner

The proposal would bring the 60-foot articulated BRT buses into our Columbia community, a developing high density residential neighborhood, thereby negatively impacting the quality of life of the residents. Furthermore, knowledge that this proposal might become reality is already adversely affecting the marketability of residential units in our community. Residents in the 330-unit Treo development, where currently NO bus traffic is experienced, would be 100% impacted by the proposal to run BRT buses on India and Kettner Streets.

Existing Trolley System

There is an existing trolley system that runs through Downtown. In fact, it runs just one block North of Broadway where BRT buses are proposed to run. The trolley system, like the proposed BRT, also serves San Diego areas to the North, East and South.

4-5

BRT buses would increase transit service to Downtown, but there is no need for them to run through Downtown. As mentioned above, they could connect to the planned Downtown shuttle service.

Broadway and Kettner Intersection

The Broadway and Kettner intersection is critical to the flow of traffic to and from the waterfront and to and from the airport. It is already impacted by trolley and train crossings, which cause frequent, lengthy delays, backing up vehicular traffic.

4-6

The proposal would station BRT buses on the West side of Kettner at the Santa Fe Depot, from where they would turn left onto Broadway. This would add to the traffic congestion at this intersection and cause further delay in vehicular, trolley and pedestrian flow.

Furthermore, the proposal ignores the planned future growth of the area West of Kettner and alongside the Bay. This growth will make traffic flow at Broadway and Kettner even more critical. The BRT proposal does not mitigate this impact, it aggravates it.

Furthermore, the comment that the Downtown Community Plan, “envisages BRT buses connecting with the downtown shuttle service, at the edge of downtown, not duplicating it by traveling into the downtown neighborhoods” is not supported by the policies and figures of the Downtown Community Plan, including Figure 7.4, which identifies potential BRT and shuttle routes in the Downtown. While the figure notes that the routes shown for BRT and shuttles are conceptual, the figure clearly shows that BRT routes would occur throughout the Downtown; there is no information in this figure or elsewhere in the Downtown Community Plan that states or suggests it envisions BRT service connecting with a shuttle service at the edge of Downtown. In any case, there is no BRT service that would occur as a result of the proposed project.

4-4

The proposed project would include features such as wider sidewalks, new sidewalk paving, new crosswalk striping, new street trees, new pedestrian lighting, and new bus shelters. The primary purpose of the proposed project is to enhance pedestrian access to rapid bus services. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would adversely affect the ability of pedestrians to walk along Broadway. Moreover, the proposed project would be consistent with the following goals and policies of the Downtown Community Plan (emphasis added):

- Policy 7.2-P-4: Undertake strategic streetscape improvements (such as *sidewalk widening*, *bulbouts*, *enhanced lighting*, and *signage*).
- Policy 7.3-G-2: *Increase transit use* among downtown residents, workers, and visitors.



Treo @ Kettner HOA
1240 India Street
San Diego, CA 92101
Phone: (619) 231-4315
Email: Treo@actionlife.com

Sincerely,
Treo at Kettner Board of Directors

Ego Agas - President
Larry Rosoff - V.P.
Nichole Addington - TREASURER
Janet Howell
[Signature] - SECRETARY

On behalf:

Treo Home Owners Association, representing 330 Units Treo @ Kettner
1240 India Street
San Diego CA 92101

- Policy 7.3-P-2: Work with other agencies to *support planned street improvements to accommodate transit.*
- Policy 7.3-P-3: Coordinate with the transit agency and other appropriate organizations to implement:
 - Internal shuttle service for local trips, connecting key downtown locations with the wider transit network, and using smaller, cleaner vehicles for flexible neighborhood trips.
 - BRT service, improving the commuter and long-distance transit network with state-of-the-art technology to provide more frequent and faster trips.
 - Bus service modifications to improve service, and to *increase transit accessibility* when the internal shuttle and BRT services begin.
- Policy 7.3-P-5: *Enhance streetscapes within transit corridors to increase attractiveness for users and promote shared transit, pedestrian, and cyclist use.*
- Policy 7.3-P-6: Encourage SANDAG to *develop real time information and signage systems* for all downtown transit facilities.
- Policy 7.3-P-7: *Coordinate transit station design with the transit agency to ensure inviting, enjoyable places, with shade, public art, landscaping, and memorable design features* reflective of the surrounding environment.

The entire segment of Broadway in the project area is designated by the Downtown Community Plan as a “Boulevard,” while the portion of Broadway from 9th Avenue to Kettner Boulevard is designated as both a “Main Street” and a “Boulevard.” Boulevards generously accommodate pedestrians and traffic, while Main Streets comfortably accommodate pedestrian, transit, and vehicular traffic. With features such as wider sidewalks, new sidewalk paving, new street trees, new pedestrian lighting, and new bus shelters, the proposed project would be accommodating to pedestrians, consistent with these designations.

4-5

Please see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the adverse effects attributed to bus operations in this comment could not occur as a result of the proposed project. Master Response 2 addresses the comment on property values. This comment does not raise any environmental issues that CEQA requires to be addressed in the MND for the proposed project.

4-6

Please see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. The proposed project would not involve the operation of any buses. As a result, the proposed project could not result in additional buses that would adversely affect traffic conditions in the project area. Section 7.16 of the Draft MND analyzes the potential traffic effects of the proposed project and concludes that no significant traffic impacts would occur. This comment does not raise any environmental issues that CEQA requires to be addressed in the MND for the proposed project.

From: aeichman1@cox.net
To: [Martin, Andrew](#)
Subject: MND
Date: Wednesday, July 03, 2013 10:22:49 AM
Attachments: [Responses to SANDAG.docx](#)

Letter 5
Anne MacMillan Eichman

Hi Andrew:

Please download my comments and questions regarding the MND for the Downtown Bus Rapid Transit Station Project.

Thank you.

Anne MacMillan Eichman

5-1

5-1
Responses to the specific comments are provided below.

To: Andrew Martin
From: Anne MacMillan Eichman
Date: July 3, 2013

RESPONSES TO SANDAG’S MITIGATED NEGATIVE DECLARATION (MND)
FOR THE DOWNTOWN BRT TRANSIT STATIONS PROJECT

Pages 21-22 - Build out for Front St. America Plaza, Santa Fe transit stations

The new stations would be an unnecessary expense if smaller, more nimble shuttle buses (which are able to carry riders traveling east and west on Broadway) were used. The trolley running east and west on C St. makes the articulated buses on Broadway redundant.

5-2

Pages 22-23 – Construction

“... because the project would be located in a high-traffic area of downtown San Diego, asphalt removal and repaving would be performed up to 24 hours per day during one weekend at each station to avoid traffic disruptions during weekday peak periods.”

5-3

This may work for weekday traffic and businesses; however, hotels and residences in the area will have NO break in noise, air pollution and traffic congestion.

Pages 28-29- Aesthetics

The proposed stations look physically out of proportion. The towering 12’ high pylons call too much unflattering attention to themselves. They are industrial-looking and not in keeping with the essence of Downtown San Diego.

5-4

Once all of the 60 ft. long buses are introduced, there will be a substantial adverse affect on the scenic vista of the Broadway view corridor, in particular, looking west.

The view on Broadway will be forever narrowed by dozens of buses and pylons framing our only promenade street.

5-2

This comment is noted and will be included in the public record for the project, and along with other economic, social, technological, and environmental factors, will be considered by SANDAG in making a decision on the project. However, the comment does not raise any environmental issues that CEQA requires to be in the MND for the proposed project. Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project.

5-3

SANDAG discloses in the Draft MND that construction of the proposed project, including work proposed to occur up to 24 hours a day during one weekend at each station has the potential to temporarily generate noise, air pollutants, and traffic congestion. As a result, analysis of these issues was provided in Sections 7.3, 7.12, and 7.16, respectively, of the Draft MND. The Draft MND concludes that no significant air quality, noise, or traffic impacts would occur as a result of construction of the proposed project. Mitigation measures are not required for effects that are not found to be significant (§15126.4(a)[3]). This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

5-4

The Draft MND evaluates potential significant aesthetic impacts of the proposed project, including the pylons, using the criteria provided in Appendix G of the CEQA Guidelines. The Draft MND concludes that the proposed project would not have a substantial adverse effect on a scenic vista (7.1a), would not substantially damage scenic resources within a state scenic highway (7.1b), would not substantially degrade the existing visual character or quality of the site and its surroundings (7.1c), or create a new source of substantial light or glare that would adversely affect day or nighttime views (7.1d).

Pages 32- 37 – Air Quality

During the construction period, air quality around the sites could be greatly affected and have lingering implications irrespective of the hours construction will take place.

“The Federal Clean Air Act identifies two standards for air pollutants: primary standards, which provide health protection for sensitive populations such as people with asthma, children and the elderly; and secondary standards, which protect public welfare such as visibility, animals, crops, vegetation and buildings.”

How can people -- and their pets -- who live and work in near proximity to the build sites be assured their health won't be adversely affected?

How can the projected estimates be so certain?

Will there be any additional safeguards? If so, what are they?

Pages 48-52 – Geology and Soils

The project area includes two active faults: the San Diego Fault which runs north-to-south from approximately Broadway to Island, between Front and Second Ave.; and the Downtown Graben which is a portion of the Rose Canyon Fault Line Zone that includes active faults within an approximately 1,000-foot-wide area roughly bounded by C and F Streets between Park Boulevard and 15th Street.

Page 49, paragraph 2: “The proposed project improvements located along eastbound Broadway between Front St. and First St. could potentially be subject to adverse effects involving rupture of the San Diego Fault. The proposed project improvements along westbound and eastbound Broadway between 11th Ave. and Park Blvd, and along southbound Park Blvd. between C St. and Broadway, could potentially be subject to adverse effects involving rupture of faults associated with the Downtown Graben.”

These are very concerning possibilities.

The next paragraph acknowledges that the proposed project would conform to applicable seismic safety standards in the CA Building Standards Code (CA Code of Regulations, Title 24).

It goes on to state: “Conformance with seismic safety standards would ensure that structures built as part of the proposed project, such as bus shelter and pylons, would not be exposed to

5-5

None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would have a significant aesthetic impact. The Draft MND explains that the Broadway view corridor designated for protection in the Downtown Community Plan would not be significantly affected by the proposed project. Figures 2-5 to 2-7 of the Draft MND visually depict the three Broadway stations both with and without the proposed project. Existing features along Broadway impede views of San Diego Bay, including mature street trees, streetlights, bus shelters, and bus amenities. Features associated with the proposed project would be installed adjacent to the existing features, and therefore the proposed features would not narrow or otherwise obstruct existing views of San Diego Bay from Broadway. Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project.

5-5

Section 7.3 of the Draft MND evaluates the potential for daily and annual air pollutants generated during construction to result in significant impacts, and concludes that daily and annual pollutant emissions would be well below the thresholds used by the City of San Diego to identify significant levels of air pollution. Because the construction air quality impact is not significant, the Draft MND is not required to identify mitigation measures to reduce or avoid this impact (§15126.4(a)[3]). Moreover, the pollutant assumptions provided in the Draft MND conservatively assume that all construction activity associated with the proposed project would occur simultaneously. In the event that construction occurs in separate phases, which is expected, the amount of daily pollution would be markedly lower than described in the Draft MND. The Draft MND acknowledges that the pollutant emissions presented are estimates. SANDAG makes no claim that the estimates are “certain,” nor is it required to do so by CEQA. The CEQA Guidelines require that when forecasting, “an agency must use its best efforts to find out and disclose all that it reasonably can.” (§15144).

5-6

potentially substantial adverse effects, including risk of loss involving rupture of a known earthquake fault. The proposed project would not increase the number of people in the project area that could be exposed to adverse effects involving rupture of an earthquake fault."

Is this sentence saying that people in the project area could be exposed to adverse effects? But rupturing an earthquake fault won't spread to include adversely affecting more people?

Page 51, Last paragraph

"San Diego County Air Pollution Control District (SDAPCD) Regulations IV, Rule 55, governing dust control, would require SANDAG to limit the discharge if visible dust emissions during construction and demolition activity. 18 The mandatory preparation and implementation of a Storm Water Pollution Prevention Permit (SWPPP) per the Construction General Permit and mandatory compliance with Rule 55 governing dust control would ensure that potential soil erosion impacts during construction remain less than significant."

How will people in the project areas know what the limit is, if SANDAG is complying, and what recourse do they have if they are being adversely affected?

Pages 53-54 – Greenhouse Gas Emissions

The proposed project is designed to facilitate pedestrian access to rapid bus services, it but will also greatly curtail the safety of all other pedestrians and those on bicycles – a much greater number than those people using the BRT.

Time will tell if the BRT Plan significantly increases bus ridership and dramatically reduces the number of vehicles on the road; thereby, reducing Greenhouse Gases.

Pages 65-66 - Land Use/Planning

Building 7 new stations is not only a big waste of our tax dollars, it puts a huge strain on Broadway – Downtown's only promenade. Tons of buses caravanning up and down will provide "frequent" bus access but not necessarily "rapid."

Pages 68-71 - Noise pollution

5-6
(cont.)

What is required is, "...a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences...The courts have not looked for perfection, but for adequacy, completeness, and a good faith effort at full disclosure." (§15151). None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant air quality effects.

5-7

5-6

The Draft MND discloses that people and property in the project area could be exposed to adverse effects involving the rupture of an earthquake fault. The adverse effects associated with rupture of an earthquake fault would essentially be the same with or without implementation of the proposed project. The text from the Draft MND that is underlined in this comment is explaining that, over the long-term, implementation of the proposed project would not increase the number of people in the project area that could potentially be subject to the adverse effects from earthquake fault rupture that exists in the project area. The number of people in the project area adversely affected by earthquake fault rupture would essentially be the same with or without implementation of the proposed project.

5-8

5-7

The Draft MND includes a link to SDAPCD Regulation IV, Rule 55, which prohibits, "discharges (of) visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60 minute period." (Rule 55 (d)[1]). The SDAPCD is responsible for compliance with its rules and regulations. For example, Regulation I, Rule 6, describes procedures for the SDAPCD to follow when violations occur.⁷ The SDAPCD website provides a form and a phone number for filing complaints.^{8,9}

5-9

⁷ <http://www.sdapcd.org/rules/Reg1pdf/R6.pdf>

⁸ http://www.sdapcd.org/comply/complaint/complaint_form.pdf

⁹ <http://www.sdapcd.org/contact/contact.html>

During the construction period, Residents living nearby will be greatly impacted by the noise. Whether the noise levels exceed the allotted limit cannot be determined until demolition is under way.

When buses start utilizing the stations, the noise will be constant, every day for 21 hours at a time. The more buses: the more noise.

Page 72 - Population/Housing

Realizing the criteria does not take into consideration the following statements, they nonetheless merit attention.

The plan will forever adversely affect the safety and quality of life for the residents in Treo and Sapphire. Some of them have already moved and others have their homes up for sale. Property values in the area will be adversely affected as will local small businesses.

Page 80 -Transportation/Traffic

The immense size of this BRT project is at odds with the overall safety of pedestrians, particularly the handicapped, older and very young in our Downtown. It will also adversely affect those on bicycles and motorcycles.

Pages 84-86 – Mandatory Findings of Significance

This project has the potential to achieve the short-term goal of bringing dozens of 60 ft. long buses into our Downtown and in the process:

- Choke the life out of Broadway
- Compromise the quality of life for thousands of residents
- Threaten personal safety
- Reduce the property value of homes in the areas nearest the buses
- Close small businesses, especially ones with outdoor seating
- Discourage new businesses from locating in the are

5-9 **5-8**
 The proposed project includes features that would benefit pedestrians, including wider sidewalks, new sidewalk paving, new bus shelters, new crosswalk striping, new street trees, and new pedestrian lighting. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that these or any other features of the proposed project would, “greatly curtail the safety of all other pedestrians and those on bicycles” or otherwise result in adverse effects to pedestrians, bicyclists, people on motorcycles, disabled persons, children, or the elderly. Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project.

5-11 **5-9**
 SANDAG discloses in the Draft MND that construction of the proposed project, including work proposed to occur up to 24 hours a day during one weekend at each station has the potential to temporarily generate noise. As a result, analysis was provided in Section 7.12 of the Draft MND. The Draft MND concludes that no significant noise impacts would occur as a result of construction of the proposed project. Construction would occur in accordance with the requirements of a construction noise permit that SANDAG would be required to obtain from the City of San Diego. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that these or any other features of the proposed project would result in significant noise impacts. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

5-12

Curtail development in areas most affected by heavy bus traffic

Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Passenger pick-up and drop-off locations associated with the approved BRT routes would not change with implementation of the proposed project.

5-10

The Treo and Sapphire buildings are located on India Street and Kettner Boulevard, respectively, on the blocks between West B Street and West A Street. While the project does not propose any improvements on the blocks on which these buildings are located, improvements would occur on the blocks of India Street and Kettner Boulevard located to the south of these buildings. The Draft MND evaluates the potential for significant environmental impacts to occur in the project area as a result of the proposed project, including the area in the vicinity of Treo and Sapphire. The Draft MND concludes that no significant environmental impacts would occur. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant adverse effects to the physical environment, including adverse effects to residents of the Treo and Sapphire buildings. The comment about human quality of life factors is noted and will be included in the public record for the project. Human quality of life factors may be considered by SANDAG in making a decision on the project, along with other economic, social, technological, and environmental factors. However, this comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

5-11

Please see the response to comment 5-8.

5-12

Please see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. As a result, the list of adverse effects that this comment attributes to, “bringing dozens of 60 ft. long buses into our Downtown” could not occur as a result of the proposed project.

From: Bahareh Feli
To: Martin, Andrew; BobFilner@sanidiego.gov; toddgloria@sanidiego.gov
Subject: SANDAG Downtown Bus Stations Mitigated Negative Declaration (MND)
Date: Sunday, July 07, 2013 10:28:32 PM

**Letter 6
Bahareh Feli**

Dear Mr. Martin'

For the past two years I have lived in the Treo building located at 1240 India Street. I strongly believe that there will be some major issues such as air pollution, noise pollution, traffic and safety for The proposed Downtown BRT Transit Stations Project. It will definitely affect us living at Treo and other individuals in the downtown neighborhood.

Please help us to put a stop on this project because it would effect us and our neighborhood negatively.

Thank you,
Bahareh Feli

6-1

6-1
SANDAG discloses in the Draft MND that construction of the proposed project has the potential to generate noise, air pollutants, and affect traffic operations. As a result, analysis of these issues was provided in Sections 7.3, 7.12, and 7.16, respectively, of the Draft MND. The Draft MND concludes that no significant air quality, noise, or traffic impacts would occur as a result of construction of the proposed project. Regarding safety, features of the proposed project such as wider sidewalks, new crosswalk striping, and pedestrian lighting would improve pedestrian safety. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to air pollution, noise, traffic, or safety. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

From: [Betty Callan](#)
To: [Martin, Andrew](#)
Subject: MND
Date: Tuesday, July 09, 2013 6:07:40 PM

Letter 7
Betty Callan

I will keep this short:

How can you think 12 foot pylons on Broadway will improve the look of the street. You will be turning it into an industrial park 'look', and the 60 foot buses will finish the look.

Has a pollution study been done with all the buses cruising down Broadway and their 'turn arounds' on India? Just north of the trolleys have someone go there around 7 am to see 3 buses lined up. I've seen drivers inside, outside (doors closed) with buses running. I questioned a driver and his answer "these buses don't pollute" Sure!!

Why have 2 short streets back to back with two different types of mass transportation. WAKE UP! Add more trolleys to our wonderful source of mass transportation that San Diego is known for, everyone loves our red trolleys.

WAKE UP! ! Your are killing one Americas most beautiful city.

Betty Callan

7-1

Please see the response to comment 5-4 for discussion of how aesthetic impacts of the proposed project, including the pylons, were evaluated in the Draft MND. Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. The environmental documents for these approved BRT routes including analysis of their potential impacts to air quality. No bus operations would occur as a result of the proposed project. Therefore, the proposed project could not result in the adverse effects that this comment attributes to the operation of buses.

7-1

**Letter 8
Carol Spangenberg**

Carol Spangenberg
1080 Park Boulevard, # 1712
San Diego, CA 92101

June 24, 2013

Mr. Andrew Martin
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Dear Mr. Martin:

RE: COMMENTS ON THE ENVIRONMENTAL DOCUMENT FOR THE DOWNTOWN BUS RAPID TRANSIT STATIONS PROJECT

Your plan seems well designed to encourage suburbanites to use public transportation but I see it as having one very unfortunate flaw. It relies on sacrificing the health and safety of the residents of the Smart Corner condominium building at Park Boulevard between C Street and Broadway.

Your plan, as proposed, will envelop the residents who live there 24 hours a day and 365 days a year in an inescapable cloud of increased vehicle pollution. It is acknowledged that the new busses by using natural gas will be less polluting; however the total mass of pollutants will increase since the number of busses will increase. It is not likely to pass the California Department of Health, San Diego Air Pollution Control Board or the federal Environmental Pollution Agency health risk calculations for toxic hot spots for volatile organics such as benzene and for micro-particulates.

Besides the localized increase in air pollution, there will be increased noise and traffic congestion around the building. The traffic congestion raises another issue that I wonder if anyone has even considered. There will be an increased likelihood of bus into car accidents at the parking garage entry on Eleventh Street under the building.

I think it is important to run the pollution hot spot models and to make serious efforts to remove some busses so that the number under the new plan will be no worse than it is at present. I don't think it is right to sacrifice the health of downtown residents in order to encourage the commuters in the suburbs to use public transportation.

Sincerely,



Carol Spangenberg
858 672 4495

8-1

The Draft MND analyzes the potential environmental effects of the proposed project, including environmental issues that could adversely affect human health and safety, such as air quality, noise, and pedestrian safety. The Draft MND concludes that the proposed project would not result in any significant adverse effects to the environment. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to air pollution, noise, traffic, or safety. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the proposed project could not result in the adverse effects that this comment attributes to the operation of buses. In any event, the adopted and certified environmental documents for the approved BRT routes do not identify toxic hot spots or any other significant air quality impacts that would occur as a result of bus operations.

8-1

Letter 9
Derek Hook

9-1

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by **July 9, 2013**.

Name DEREK HOOK
Company/Organization _____
Address 1601 INDIA ST #406
City SAN DIEGO State CA Zip 92101
Phone 619 501 2016 E-mail derekhook@cox.net

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

I lived for 5 years in downtown Minneapolis which is one of your best markets for BRT. I have no objection to BRT in general but specifically to parking buses on the street as lot in downtown residential areas.

In Minneapolis the buses end up in the underground downtown rapid transit tubes on the street 211th street or behind the convention center also in downtown MSF very much like SD. I drove up & down 2nd ave & how gutted the into the bus/cw lane separation and find it very workable.

Downtown MSF is not just office bldgs there were a

9-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:

Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



number of Apt buildings (eg Marquette Plaza where I lived) directly done by the BRT routes. In addition just off the cross streets from Marquette Avenue were a number of new residential condo complexes (including the the senator Al Foster lives in Marbella M.S.P.) The houses either went into the front yards or behind the commercial center during "rest" time. I know that getting underground parking for the complex is difficult in SD due to the water table but if they can solicit from the County Admin Bd with the kinds of underground parking right at the street front they should be able to do it closer to the downtown core area.

David Koch

9-1
(cont.)

From: [Hamid X Bagheri](#)
To: [Martin, Andrew](#)
Cc: BobFilner@sandiego.gov; toddgloria@sandiego.gov
Subject: SANDAG Downtown Bus Stations Mitigated Negative Declaration (MND)
Date: Tuesday, July 02, 2013 6:12:13 PM

Letter 10
Hamid X Bagheri

Dear Mr. Martin,

I have owned a property at the Treo building located at 1240 India Street since it was constructed in 2003. The proposed Downtown BRT Transit Stations Project will adversely affect individuals living at Treo and in the downtown neighborhood. Some of the issues I see with this project are:

Safety

The immense size of this BRT project will affect safety of pedestrians, particularly my two young children.
It will also affect handicapped, and older individuals, and bicycle riders.

Noise pollution:

Noise from construction, and worse yet, when buses start operating will have and adverse affect on quality of life in that area.

Air pollution:

Air pollution will affect people living close to the bus station, particularly children and the elderly.

Traffic:

The immense size of this BRT project is at odds with the overall safety of pedestrians, particularly the handicapped, older and very young in our Downtown.

Additionally, the new stations would be an unnecessary expense if smaller, shuttle buses were used, and the trolley running east and west on C St. makes the articulated buses on Broadway redundant.

I would appreciate it if you take into consideration these issues and its impact on quality of our lives when deciding on this project.

Best Regards,
Hamid Bagheri

10-1

Please see the responses to comments 4-4 and 5-8 addressing the safety of pedestrians, children, disabled persons, the elderly, and bicyclists. The Draft MND analyzes the potential environmental effects of the proposed project, including air quality, noise, traffic, and pedestrian safety. The Draft MND concludes that the proposed project would not result in any significant adverse effects to the environment. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to air pollution, noise, traffic, or safety. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

10-1

Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the proposed project could not result in the adverse effects that this comment attributes to the operation of buses.

**Letter 11
Jake Bomerin**

From: jbomerin@cox.net
To: [Martin, Andrew](#)
Subject: Rapid Transit Proposal.
Date: Tuesday, July 02, 2013 1:46:57 PM

I believe your plan has everything reversed. Routes should converge on the fringe of the city not in the middle of it. This will mitigate traffic congestion, quality of life issues for downtown and expenses for changes that need to be made. The plan as it stands does not consider the thriving City as it exists today. It disregards those who already live and work here. I am against this.

Barb and Jake Bomerin
Treo

11-1

11-1
The Draft MND analyzes the potential environmental effects of the proposed project, including traffic. The Draft MND concludes that the proposed project would not result in any significant adverse effects to the environment. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to traffic. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the proposed project could not result in adverse environmental effects associated with the operation of buses.

**Letter 12
Jim Gregg**

From: [Jim Gregg](#)
To: [Martin, Andrew](#)
Cc: toddgloria@sandiego.gov; aeichman1@cox.net
Subject: BRT_BusStation_projectid_401_16063
Date: Monday, June 17, 2013 11:33:25 AM
Attachments: [Questions_RE_MND_06.17.2013.doc](#)

RE: BRT_BusStation_projectid_401_16063

Greetings,

I have some preliminary questions regarding the Draft MND for the downtown/Broadway BRT bus station project. I will be unable to attend the public presentation this week (06/19/2013) because I am away and the meetings never seem to occur when I am in San Diego. Please try to address the following questions. Thanks in advance for your feedback. I have included as distribution my council district office and others who might find your answers useful.

12-1

1. BRT Fares. What will be the fare structure for the BRT bus? Will you be able to use a regular COMPASS card to ride the BRT busses or will the fare be a premium fare? Will you be able to transfer from a regular bus to a BRT bus without paying a double fare? Will there be a BRT fare collection box on each BRT bus, or will you need a prepaid COMPASS card to board the BRT bus?

12-2

2. Bikes on BRT. Will the BRT buses have bike racks? Or if not will there be accommodation for bikes on the BRT busses? How many bikes on the BRT bus?

12-3

3. Broadway BRT stations at Smart Corner. The BRT MND indicates the removal of the current bus stop benches and signage along Broadway between 11th Avenue and Park Blvd, with the replacement of the BRT pylons and shelters. (Section 2.1 under Project Description). I believe the #2 bus and others now stop/transfer to the trolley at this location. Will regular bus service be integrated into the new BRT station or is the construction of the BRT station the elimination of the regular bus transfer/stop? If the new BRT logo station incorporates regular buses, will it include regular bus schedule information on the electronic display?

12-4

4. I may have more questions after further review of the BRT MND document but wish to get this to you now.

12-1

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project. The BRT services will be fully integrated into the MTS fare structure. Currently, it is proposed that BRT fares will be equivalent to a trolley fare. BRT passengers will be able to transfer to a regular bus without paying an additional fare. A passenger will be required to hold a compass card or pay cash on-board the BRT vehicle.

12-2

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project. The BRT vehicles will include bike racks. Two bikes will be accommodated on each vehicle.

12-3

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project. Local buses, including MTS Route 2, will continue to stop at 11th Avenue. They will be integrated into the BRT stop at this location.

12-4

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

RE: BRT_BusStation_projectid_401_16063

Greetings,

I have some preliminary questions regarding the Draft MND for the downtown/Broadway BRT bus station project. I will be unable to attend the public presentation this week (06/19/2013) because I am away and the meetings never seem to occur when I am in San Diego. Please try to address the following questions. Thanks in advance for your feedback. I have included as distribution my council district office and others who might find your answers useful.

1. BRT Fares. What will be the fare structure for the BRT bus? Will you be able to use a regular COMPASS card to ride the BRT busses or will the fare be a premium fare? Will you be able to transfer from a regular bus to a BRT bus without paying a double fare? Will there be a BRT fare collection box on each BRT bus, or will you need a prepaid COMPASS card to board the BRT bus?
2. Bikes on BRT. Will the BRT busses have bike racks? Or if not will there be accommodation for bikes on the BRT busses? How many bikes on the BRT bus?
3. Broadway BRT stations at Smart Corner. The BRT MND indicates the removal of the current bus stop benches and signage along Broadway between 11th Avenue and Park Blvd, with the replacement of the BRT pylons and shelters. (Section 2.1 under Project Description). I believe the #2 bus and others now stop/transfer to the trolley at this location. Will regular bus service be integrated into the new BRT station or is the construction of the BRT station the elimination of the regular bus transfer/stop? If the new BRT logo station incorporates regular buses, will it include regular bus schedule information on the electronic display?
4. I may have more questions after further review of the BRT MND document but wish to get this to you now.

12-5

Please see responses to comments 12-1 to 12-4.

12-5

From: [Jim Gregg](#)
To: [toddloria@sandiego.gov](#); [BobFilner@sandiego.gov](#); [Martin, Andrew](#)
Cc: [aeichman1@cox.net](#)
Subject: SANDAG Project ID 401_16063 Downtown San Diego BRT Bus Station Project
Date: Sunday, July 07, 2013 11:16:04 AM

Letter 13
Jim Gregg

Greetings,

I would like to provide you with my comments on the MND BRT bus station project in addition to sending them to SANDAG representative Andrew Martin. My intention is to make wide distribution of my comments and concerns over the proposed BRT bus project and the negative impact on the downtown San Diego environment. Thanks in advance for your attention to this matter.

Respectfully,

Jim Gregg
Downtown Resident & Property Owner

Comments Regarding the draft MND for the downtown San Diego BRT bus stations. (7/4/2013)

Downtown San Diego should be thought of as one integrated destination (campus area) with several learning centers, concessions like the Ball Park, Horton Plaza, Seaport Village, the new library, the Waterfront and the Convention Center, in addition to work and living spaces for over 30,000 residents. Walking, biking and the use of public transportation within these areas should be encouraged. The area is already served by local buses and the trolley which provide convenient and timely access to all the shopping, employment and business centers, including near access to the waterfront/Broadway Pier bay front and County Administration, which is only a short walk from the Santa Fe Depot.

The plan to run large articulating BRT buses down the Broadway corridor every few minutes will disrupt traffic and introduce safety concerns for pedestrians, cyclists and motorists, alike. There is no need for this to occur! The BRT buses should increase the travel options for commuters "to" downtown San Diego, and not disrupt and overwhelm the downtown environment with more street traffic and congestion along the already busy Broadway corridor. BRT passengers can stage to/from the BRT system at the City College/Smart Corner transit area which already provides connections to the trolley and several other local buses that circulate the downtown area. There is no need for another fleet of jumbo busses to travel east and west on Broadway downtown.

Communities within the city of San Diego have installed traffic calming techniques to make neighborhoods safer, and now misguided transportation planners want to disrupt the environment along the main downtown corridor. The environment along Broadway should not be disrupted to provide doorstep service to BRT "choice riders". The expectation is that BRT passengers have other transportation options and need to be lured from their vehicles by offering premium service on the BRT.

All the BRT bus routes are planned to arrive/depart from the City College

13-1

13-2

13-1

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

13-2

Please see the response to comments 4-4 and 5-8 addressing the safety of pedestrians, children, disabled persons, the elderly, and bicyclists. The Draft MND analyzes the potential environmental effects of the proposed project, including traffic and pedestrian safety. The Draft MND concludes that the proposed project would not result in any significant adverse effects to the environment. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to traffic or pedestrian safety. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the proposed project could not result in the adverse effects that this comment attributes to the operation of buses. Also, to clarify, the City College transit station at Smart Corner would not be the first or last arrival/departure point for the approved BRT routes. The approved routes would terminate and originate on India Street and Kettner Boulevard, respectively, in Downtown San Diego.

area at Smart Corner either as the first or last arrival/departure point. The least impact on downtown is to stage the buses there and not impact the pedestrian and vehicular activity along Broadway. The focus of transportation planners should be to optimize the public services with the least impact on the quality of the environment. There needs to be a deliberate attempt to integrate the BRT service into the other transportation options that already exist. The primary objective of the BRT service should be to provide rapid and timely transportation to and from the downtown portal area around Smart Corner, for connecting to the network of bus and trolley service which already exists downtown.

The BRT Bus Station MND suggests there would be no negative environmental impact on the downtown area. My personal view is that the 15' high billboard size pylons stand out like Las Vegas Casino advertisements and are out of character, especially in the Gas Lamp area along Broadway adjacent to a renewed Horton Plaza. The large BRT signage is only suitable around the Smart Corner transit area as upgrade improvements to provide timely BRT/local bus arrival information, etc.

The introduction to the Draft MND on page 3 states "that the project would not have a significant effect on the environment". Introducing more than 30 large articulating buses per hour onto the main pedestrian and business corridor downtown is most problematic. There will be added danger with busses leap-frogging from one stop to the next, and the pedestrian experience will be impacted. There should be safety concerns!

The MND states: "One purpose of the proposed project is long-term improvement of the visual character and quality of the project area. There is no evidence that over the long-term the proposed project could substantially degrade the visual character or quality of the area or its surroundings. This is a less than significant impact."

I just do not agree! Once the busses start running the impact will be a disaster to those who have to deal with the added congestion and consequences of these large jumbo busses in the neighborhood.

The MND states: "Operation of the proposed project would not have a noticeable effect on air quality, with the exception of the proposed dedicated right-turn lane that would be striped along westbound Broadway at First Avenue". This is garbage. Have you ever been on a bicycle and had one of these large buses pass by within a foot of your shoulder and not

13-2
(cont.)

13-3

13-4

13-3

To clarify, the Draft MND concludes that the proposed project would not result in any significant adverse effects to the physical environment, including aesthetic effects. The Draft MND evaluates the potential significant aesthetic impacts of the proposed project, including the proposed pylons, using the criteria provided in Appendix G of the CEQA Guidelines. The Draft MND concludes that the proposed project would not have a substantial adverse effect on a scenic vista (7.1a), would not substantially damage scenic resources within a state scenic highway (7.1b), would not substantially degrade the existing visual character or quality of the site and its surroundings (7.1c), or create a new source of substantial light or glare that would adversely affect day or nighttime views (7.1d). Figures 2-5 to 2-7 of the Draft MND visually depict the three Broadway stations both with and without the proposed project. SANDAG acknowledges that the proposed project would result in visual change to the project area, but as shown on the Draft MND figures and described in the analysis, the proposed project would not have a significant adverse aesthetic impact under any of the above criteria. Moreover, none of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would have a significant aesthetic impact.

13-4

Please see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the proposed project could not result in the adverse effects that this comment attributes to the operation of buses. This comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

experienced the heat generated by the engine? Just the size of the vehicle will be overwhelming to a person on a bike when it passes by, much less the heat and exhaust fumes discharged. .

The MND states: "Operation of the proposed project would not have a substantial effect on ambient noise levels". This maybe true for the bus shelters proposed, but once the buses start running throughout the adjacent residential areas of downtown there would be a significant increase in noise pollution created by the BRT buses.

In summary the least impact on downtown (and it makes common sense) is to stage the BRT buses in the Smart Corner/City College area and not impact the pedestrian and vehicular activity along Broadway and in the adjacent residential neighborhoods. There already are transportation options from all areas of downtown to the Smart Corner transit hub which provide timely bus and trolley service. Think Green! Consider painting the curb lane along

13-4
(cont.)

Broadway green from Horton Plaza to the Waterfront for the exclusive use by bikes and pedi cabs, and not turning it into a danger zone for oversized jumbo buses.

Letter 14
Joan Van Der Hoeven



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbtr. Written comments must be received by July 9, 2013.

Name JOAN VAN DER HOEVEN
Company/Organization _____
Address 2330 1ST AVE UNIT 406
City SD State CA Zip 92101
Phone 619 236 8939 E-mail wjrdh@cox.net

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

BUSES COMING INTO THE CBD SHOULD NOT BE
ROUTED THROUGH RESIDENTIAL AREAS.
I OWN PROPERTY IN ACQUA VISTA, LITTLE ITALY
AND STRONGLY OPPOSE BUS TERMINALS/TURN AROUNDS
IN ANY AREA NORTH OF 'A' STREET. ASH STREET IS
NOT IN LITTLE ITALY (SOUTH SIDE) BUT CONDOX ON
ASH ST SHOULD BE PROTECTED FROM EXCESSIVE
NOISE POLLUTION, LIGHTS, TRAFFIC FROM BUSES
COMING FROM THE SUBURBS.

14-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:
Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905





COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by July 9, 2013.

Name Kevin Lehman
Company/Organization Action Property Management
Address 1240 India St.
City San Diego State CA Zip 92101
Phone 619 231-4315 E-mail klehman@actionlife.com

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

Hello:
I am the general manager for Treo @ Kettner HOA (330 unit highrise along A & B India & Kettner). The owners and residents of my building are extremely concerned about the upcoming EIR of parklot locations in the Columbia district & also the bus & proposed bus route. Please contact me directly to discuss this item in more detail.

Best regards, [Signature]

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:
Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



Letter 15
Kevin Lehman

15-1

Please see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Master Response 1 also explains that there is no bus layover facility included in the proposed project. Therefore, the proposed project could not result in the adverse effects that this comment attributes to the operation of buses or construction and operation of a bus layover facility. This comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

15-1

From: [Khoa Nguyen](#)
To: [Martin, Andrew](#)
Subject: BRT MND Comments
Date: Tuesday, July 09, 2013 3:04:27 PM

Letter 16
Khoa Nguyen, on Behalf of Sofia Hotel

Hi Andrew,
Here are my comments and questions for the BRT. Many of these have been answered by Jennifer Williamson/Leslie Wade, but I want to make sure we have it on the record on behalf of the Sofia Hotel. Thanks

The proposed above ground utility box that's going to be installed at the northeast corner of Broadway and Front Street (in front of Coffee Bean).

1. Can you give me the dimensions of the box?
2. Who will be responsible for maintenance of the box?
3. What's currently there at that location?
4. How was that location chosen? Based on what criteria?
5. Were there alternative locations evaluated? Where were these locations? And why were they rejected?
6. Must the box be above ground?

16-1

Additionally:

1. A Communications line will be installed on the north west corner of First Street. Will construction affect the sidewalks of the Tender Greens storefront?
2. Please provide us with the list of construction and demolition dates that will take place on the south side of Broadway between First and Front. There will be approximately 5 demolition periods, 2 days at a time, so approximately 10 days of demolition total.
3. Most of the work will done at night and on weekends, and contractor must adhere to the City's noise ordinance. What are the decibel requirements that the contractor must adhere to? We have concerns for the comfort of the guests staying at the hotel, and that we expect advanced notice of prior to demolition periods. What other outreach will SANDAG do to keep business owners apprised during construction?
4. Will the Sofia Hotel have use of their parking curb for buses during the construction period?
5. We are requesting weekly/bi-weekly construction briefings to keep us in the loop of what will take place during construction.

16-2

Thanks Andrew.
Khoa

[Khoa V. Nguyen](#)

16-1

The Draft MND incorrectly describes an above ground utility box at the northeast corner of Broadway and Front Street. SANDAG has revised the Final MND to correctly indicate that the utility improvements proposed at this location would not occur above ground. This comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

16-2

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project. There may be minor, temporary impacts to the sidewalk in front of the Tender Greens storefront. However, the construction work in this area would occur in the street. A detailed construction schedule has not been prepared at this time. Once completed, adjacent residents, businesses, and property owners will be notified of the schedule before construction begins. Construction will be required to adhere to a construction noise permit that SANDAG is required to obtain from the City of San Diego, including provisions governing allowable noise levels (i.e., decibels). The parking curb adjacent to the storm drain located in front of the Coffee Bean and Tea Leaf (corner of Broadway and Front Street) will be subject to temporary closure during construction for the installation of new storm drain infrastructure.

Account Executive
Public Policy Strategies, Inc.
1620 Fifth Avenue, Suite 750
San Diego, CA 92101
Ph: 619-231-0996 ext.202
Fax: 619-236-0683
www.pps.us.com



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by July 9, 2013.

Name Leilani Vigil
Company/Organization
Address
City State Zip 92101
Phone E-mail leilani.45@hotmail.com

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

Handwritten comment: though some information was helpful - many people from sandag + MTS did not know why helpful information. Many questions remain unanswered after 2 years of coming to these meetings. I ride the trolley and am not against mass transit but do not know the routes of the buses (I asked 3 people) is short sighted. Info given tonight was contradictory.

Handwritten comment: Is there an environmental impact study being done? How many more riders do you expect with these new buses?

Comments on the environmental document also can be submitted in writing by mail, email, or fax to: Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101 andrew.martin@sandag.org FAX: (619) 699-1905



Letter 17
Leilani Vigil

17-1 This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

17-2 A Mitigated Negative Declaration has been prepared for the proposed project. As explained in Master Response 1, several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. This comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project. SANDAG transportation modeling of BRT service implementation based on the adopted 2050 RTP/SCS projects that approximately 21,000 additional passengers would be served by 2018.

17-1

17-2

**Letter 18
Leslie E. Henshaw**

18-1

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by **July 9, 2013**.

Name LESLIE E. HENSHAW
Company/Organization PRIVATE CITIZEN
Address 745 E. BRADLEY AVE, #46
City EL CAJON State CA Zip 92021
Phone _____ E-mail doctor940who@hotmail.com

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

I ENJOYED THE DISPLAYS. VERY WELL DONE.
MOST OF MY QUESTIONS WERE ANSWERED.

18-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:

Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



Letter 19
Mahbod Cyrus Rashidi

From: [Mahbod Cyrus Rashidi](#)
To: [Martin, Andrew](#); BobFilner@sanidiego.gov; toddqloria@sanidiego.gov
Subject: SANDAG Downtown Bus Stations Mitigated Negative Declaration (MND)
Date: Sunday, July 07, 2013 10:03:02 PM

Dear Mr. Martin,

I am a property owner at the Treo building located at [1240 India Street](#). The proposed Downtown BRT Transit Stations Project will adversely affect individuals living at Treo and in the downtown neighborhood. Some of the issues I see with this project are adverse noise pollution, air pollution, safety and the traffic that would result, which are irrefutable facts.

Please take the above mentioned issues into consideration since it will negatively affect our beloved neighborhood.

Yours ,

Dr. Mark Rashidi

Respect and Conserve, Reuse and Recycle

This message contains information which may be confidential and privileged. unless you are the addressee (or authorized to receive for addressee),you may not use,copy or disclose to anyone the message. If you have received the message in error,please advise the sender and delete the message. Thank you.

19-1

19-1
The Draft MND analyzes the potential environmental effects of the proposed project, including air quality, noise, traffic, and pedestrian safety. The Draft MND concludes that the proposed project would not result in any significant adverse effects to the environment. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to air pollution, noise, traffic, or safety. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

From: [Mark Eichman](#)
To: [Martin, Andrew](#)
Subject: MND for Downtown BRT Transit Stations
Date: Thursday, July 04, 2013 2:40:01 PM

Letter 20
Mark Eichman

Dear. Mr. Martin,

I have the following concerns/considerations regarding SANDAG's Mitigated Negative Declaration for the Downtown BRT Transit Stations Project:

NUMBER #1 regards the build out for BRT stops at Front St., American Plaza and Santa Fe transit stations. I believe these stops are totally REDUNDANT to stops that already exist for riders on the East-West Bus routes along Broadway and East-West Trolley stops on "C" Street. Nowhere in the document do you justify WHY we need to spend money on this additional construction for redundant stops.

Wouldn't it be a wiser use of taxpayer dollars to explore alterations to existing stops that might accommodate BRT, or even more sensible, implement nimble shuttle bus routes to carry riders East-West without the need for additional construction, noise, pollution, blocking traffic, etc. that will inevitably come with the 60-foot articulating buses?

NUMBER #2 regards your assumptions about construction of the new BRT transit stations. You indicate that because the project is located in a high-traffic area of downtown, asphalt removal and paving would be performed up to 24 hours per day during one weekend at each station to avoid traffic disruptions during weekday peak period.

How very kind of you to consider traffic disruption, but what about the disruption for thousands of San Diego residents and visitors, and the scores of local businesses, who will be affected by the noise, pollution and congestion. Is there room in your budget to move all of these people to a comparable home, hotel or business in a quiet area during your construction phase?

Are we to assume from your MND that SANDAG's concern extends to traffic patterns only and not also to the residents and visitors to San Diego that are affected?

20-1
Please see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the proposed project could not result in the adverse effects that this comment attributes to the operation of buses.

20-2
In any event, the approved bus routes would involve passenger drop-off and/or pick-up at the locations that are proposed for improvements as part of the proposed project. However, the locations of passenger drop-off and pick-up for these BRT routes were analyzed and approved as part of these independent, stand-alone projects. Section 1.0 Introduction of the Draft MND explains that the primary purpose of the proposed project is to enhance pedestrian access to the approved BRT services (see third paragraph, page 1). Section 1.0 also explains that the seven proposed transit stations would be served by the approved BRT routes. The approved BRT routes would serve these locations with or without implementation of the proposed project. This comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

20-2
SANDAG discloses in the Draft MND that construction of the proposed project, including work proposed to occur up to 24 hours a day during one weekend at each station has the potential to generate noise, air pollutants, and traffic congestion. As a result, analysis of these issues was provided in Sections 7.3, 7.12, and 7.16, respectively, of the Draft MND. The Draft MND concludes that no significant air quality, noise, or traffic impacts would occur as a result of construction of the proposed project. Mitigation measures are not required for effects which are not found to be significant (§15126.4(a)[3]).

NUMBER #3 regards the Air Quality Chart (Chart 7.3) showing “Less than Significant Impact” or “No Impact” on the five listed categories of air quality. What rationale or credible evidence do you have to make those determinations? You present none in the document.

Are we to believe that the Federal Clean Air Act governing primary and secondary standards for health and public safety will not all be impacted by the air quality during construction? That people and their pets that live and work in the area can be assured their health and safety won't be adversely affected?

What coverage does SANDAG have to block lawsuits that will most certainly result in violations to the Federal Clean Air Act during construction? Or, will we as taxpayers be expected to cover those costs too?

NUMBER #4 regards your very broad statement that Greenhouse Gas Emissions will be significantly reduced with the advent of BRT. Where is your evidence? What sane person could possibly believe, based on the evidence you offer, that adoption of BRT in San Diego will reduce Greenhouse Emissions. Yes, the project is designed to create pedestrian access to bus services, but at the same time it greatly curtails the access and safety of walking pedestrians or those on bicycles, who by the way, emit no greenhouse gasses and are in much greater numbers than anyone is proposing for BRT.

There has been no credible study or projection released to the public which shows projected ridership or increase in usage of bus services in San Diego with BRT. We get a lot of anecdotal evidence, but nothing concrete. Based on anecdotal evidence, I can tell you 90 percent of the buses I see on Broadway have fewer than five passengers. Show us something more concrete than that before you waste millions of our tax dollars on this ill conceived plan!

None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to air pollution, noise, traffic, or safety. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

20-3

Section 7.3 of the Draft MND evaluates the potential for daily and annual air pollutants generated during construction to result in significant impacts, and concludes that daily and annual pollutant emissions would be well below the thresholds used by the City of San Diego to identify significant levels of air pollution (also see Appendix A to the Draft MND). Because the construction air quality impact is not significant, the Draft MND is not required to identify mitigation measures to reduce or avoid this impact. Moreover, the pollutant assumptions provided in the Draft MND conservatively assume that all construction activity associated with the proposed project would occur simultaneously. In the event that construction occurs in separate phases, which is expected, the amount of daily pollution would be markedly lower than described in the Draft MND. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to air pollution. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

20-4

To clarify, the Draft MND does not include a statement that, “Greenhouse Gas Emissions will be significantly reduced with the advent of BRT.” The Draft MND states that, “the proposed project is intended to facilitate pedestrian access to rapid bus services, which are proposed in part to reduce transportation-related GHG emissions in the San Diego region.” (Section 7.7, page 54) The Draft MND further explains that the SANDAG 2050 RTP/SCS identifies transportation and land use strategies (including rapid bus services) to

NUMBER #5 regards important considerations about BRT's impact on downtown San Diego, which factors indirectly into the criteria of this MND. It adversely affects the safety and quality of life for the residents in two major downtown residential towers, Treo and Sapphire. They have invested millions of dollars in downtown to make it a more desirable, livable place to be. Now, based on the threat of this plan, some have moved out and others are putting their homes up for sale. Property values in the area will be adversely affected, as will local businesses. Is this what San Diego had in mind for redeveloping the downtown core neighborhoods?

BRT will bring dozens of 60-foot long busses into downtown to choke the life out of Broadway, compromise the quality of life for thousands of residents and visitors, reduce property values in the area, close small businesses (particularly ones with outdoor seating), discourage new businesses in the area, and most importantly, curtail residential tax-paying new developments by turning a residential-mixed use area into an industrial zone.

Is this what the city planners really want?

I look forward to your timely response.

Mark Eichman
619-794-0303 (O)
248-6134585 (M)
mark@eichmans.com

20-5 achieve per-capita greenhouse gas emissions reductions from on-road transportation sources, and that according to the California Air Resources Board, implementation of the 2050 RTP/SCS would achieve the state-established per-capita greenhouse gas emission reductions for 2020 and 2035 for the San Diego region. In any event, the proposed project does not include any bus operations as explained in Master Response 1. Moreover, the Draft MND concludes that greenhouse gas emissions generated by construction and operation of the proposed project would not directly or indirectly have a significant effect on the environment.

As described in the response to comment 4-4, the proposed project includes features that would benefit pedestrians, including wider sidewalks, new sidewalk paving, new bus shelters, new crosswalk striping, new street trees, and new pedestrian lighting. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that these or any other features of the proposed project would result in significant adverse effects to pedestrians or bicyclists. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND.

20-5

The Treo and Sapphire buildings are located on India Street and Kettner Boulevard, respectively, on the blocks between West B Street and West A Street. While the project does not propose any improvements on the blocks on which these buildings are located, improvements would occur on the blocks of India Street and Kettner Boulevard located to the south of these buildings. The Draft MND evaluates the potential for significant environmental impacts to occur in the project area as a result of the proposed project, including the area in the vicinity of Treo and Sapphire. The Draft MND concludes that no significant environmental impacts would occur. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant adverse effects to the physical environment, including adverse effects to residents of the Treo and Sapphire buildings.

The comment about human quality of life factors is noted and will be included in the public record for the project. Human quality of life factors may be considered by SANDAG in making a decision on the project, along with other economic, social, technological, and environmental factors. However, this comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND. Please also see Master Response 2 which addresses comments on property values.



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by July 9, 2013.

Name Michael Chua
Company/Organization
Address 872 Cardiff Street
City San Diego State CA Zip 92124
Phone (619) 621-1776 E-mail mchua24@gmail.com

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

I'm a huge transit enthusiast, and I've been riding around town in buses and trolleys when I was little growing up here in San Diego. I simply believe that everyone at both SANDAG and MTS can come up with the perfect idea by bringing a perfect public passenger service with this brand new Rapid Transit service to improve our city's great transit service, which has the same opportunities like our Trolley Lines and Express Bus Routes. I am so ready and prepared to set up

Comments on the environmental document also can be submitted in writing by mail, email, or fax to: Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101 andrew.martin@sandag.org FAX: (619) 699-1905



Letter 21 Michael Chua

21-1 This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

21-1

**Letter 22
Michael Hebert**

From: [Personal](#)
To: [Martin, Andrew](#)
Subject: BRT Downtown stations
Date: Wednesday, June 12, 2013 9:24:09 AM

Andrew-
As a concerned citizen and owner of one of the penthouses at TREO, I truly feel that the location proposed at kettner and ash is simply horrible.

The air quality from the idling buses let alone the added congestion of the 35 buses am hour is simply a horrific addition to downtowns Columbia district.

After owning in Treo from its inception, I feel that SANDAG is ignoring the publics outcry for justice and placing their supposed "justifications" ahead of our tax paying voices.

There has got to be other options in other industrial locations that are not surrounded purely by residential homes.

This process has been long and drawn out by every agency and the lack of concern for residents that have voiced their opposition is a disgrace.

I pray that you look at this project as if you and your immediate family lived directly adjacent to it.

Any feedback or response you might have is appreciated greatly.

A very concerned citizen of downtowns Columbia district-

Michael Hebert
1240 India st 1515

Sent from my iPhone

22-1

22-1

The proposed project does not propose any improvements at the intersection of Kettner Boulevard and Ash Street. Please see Master Response 1 explaining that the proposed project is independent from other projects, including approved BRT routes and a potential bus layover facility. The proposed project would not involve bus operations or construction and operation of a bus layover facility. Therefore, the proposed project could not result in the adverse air quality effects that this comment attributes to the operation of buses. In any event, the adopted and certified environmental documents for the approved BRT routes do not identify toxic hot spots or any other significant air quality impacts that would occur as a result of bus operations. This comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

Letter 23
Myron Newton



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by **July 9, 2013**.

Name MYRON NEWTON
Company/Organization _____
Address _____
City _____ State _____ Zip 92101
Phone _____ E-mail ODARP99@COX.NET

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

I LIKE RAPID TRANSIT AND THINK THE DESIGN OF THE STATIONS ARE GOOD.
NOT SURE OF HAVING TWO PYLONS ON EACH BLOCK RATHER THAN JUST
ONE NEXT TO THE STATION. GOOD TO SEE ALL TREES WILL EITHER REMAIN
OR BE REPLACED.

23-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:

Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



Letter 24
Nancy Coleman

24-1

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by July 9, 2013.

Name Nancy Coleman
Company/Organization _____
Address 3019 Meadow Grove Dr.
City San Diego State _____ Zip 92110
Phone _____ E-mail ncoleman@cox.net

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

Thank-you for including actual trees in the design. The palms I originally heard about provide no shade for someone stuck waiting for a late or absent bus.
The lean-bars are OK if you are only waiting 10 minutes but how real is that? Stop building to address the homeless problems and provide what people need. Seating where it is still available is usually designed as an instrument of torture so you won't sit.

24-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:

Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



Letter 25
Nazanine Espahbodi

From: [Nazanine](#)
To: [Martin, Andrew](#)
Cc: BobFilner@sanidiego.gov; toddqloria@sanidiego.gov
Subject: SANDAG Downtown Bus Stations Mitigated Negative Declaration (MND)
Date: Thursday, July 04, 2013 12:49:06 PM

Dear Mr. Martin,

I have owned a unit in Treo since 2003 and I can say the proposed stations will look unattractive as they look industrial and do not fit the San Diego Downtown fabulous look we currently have.

When these buses are placed, our condos scenic view, in particular looking west from Broadway will be replaced by nothing but buses and pylons, they will be framing our only promenade street.

Our air quality will be affected due to the hours of constructions taking place. The Federal Clear Air act identifies two air pollutants with standards such as providing health protection for sensitive population such as people with asthma, children and elderly. And the second standards, which protects public welfare such as visibility, animal crops, vegetation and buildings.

We will be impacted by the noise during the construction period. And when the buses start utilizing the station the constant noise for 21 hours at a time will be extremely bothersome to us the residents. The safety and the quality of life in Treo will be affected.

In conclusion, the immense size of this BRT projects will effect the safety of our elderly, young children and handicapped. It will also affect those on bicycles.

Thank you,

Nazanine Espahbodi

25-1

The Draft MND evaluates the potential significance aesthetic impacts of the proposed project using the criteria provided in Appendix G of the CEQA Guidelines. The Draft MND concludes that the proposed project would not have a substantial adverse effect on a scenic vista (7.1a), would not substantially damage scenic resources within a state scenic highway (7.1b), would not substantially degrade the existing visual character or quality of the site and its surroundings (7.1c), or create a new source of substantial light or glare that would adversely affect day or nighttime views (7.1d). SANDAG acknowledges that the proposed project would result in visual change to the project area, but as shown on the Draft MND figures and described in the analysis, the proposed project would not have a significant adverse aesthetic impact under any of the above criteria. Moreover, none of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would have a significant aesthetic impact. To clarify, the proposed project would not install any pylons or perform any improvements along Broadway to the west of the Treo building. Moreover, Treo is located on India Street between West A and West B Streets, and does not have views looking west along Broadway.

Please see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the adverse effects attributed to bus operations in this comment could not occur as a result of the proposed project. There are approved BRT services independent of the proposed project that will serve Downtown.

Section 7.3 of the Draft MND evaluates the potential for daily and annual air pollutants generated during construction to result in significant impacts, and concludes that daily and annual pollutant emissions would be well below the thresholds used by the City of San Diego to identify significant levels of air pollution. Because the construction air quality impact is not significant, the Draft MND is not required to identify mitigation measures to reduce or avoid this impact. Moreover, the pollutant assumptions provided in the Draft MND conservatively assume that all construction activity associated with the proposed project would occur simultaneously. In the event that construction occurs in separate phases, which is expected, the amount of daily pollution would be markedly lower than described in the Draft MND.

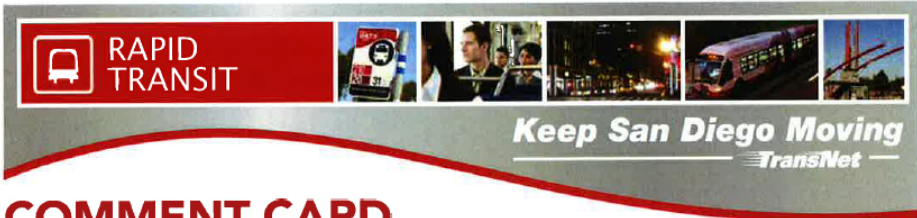
SANDAG discloses in the Draft MND that construction of the proposed project, including work proposed to occur up to 24 hours a day during one weekend at each station has the potential to generate noise. As a result, analysis was provided in Section 7.12 of the Draft MND. The Draft MND concludes that no significant noise impacts would occur as a result of construction of the proposed project. Construction would occur in accordance with the requirements of a construction noise permit that SANDAG would be required to obtain from the City of San Diego.

The proposed project would include features such as wider sidewalks, new sidewalk paving, new crosswalk striping, new street trees, new pedestrian lighting, and new bus shelters. The primary purpose of the proposed project is to enhance pedestrian access to rapid bus services. There is no evidence presented in comments on the Draft MND or elsewhere in the record that the proposed project could adversely affect pedestrians or bicyclists, including children, the elderly, or the disabled.

Letter 26
Polly Gillette

26-1

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by **July 9, 2013**.

Name Polly Gillette
Company/Organization _____
Address 10500 Park Blvd #1514
City San Diego State CA Zip 92101
Phone _____ E-mail _____

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

A light is needed at the intersection
at Park Blvd. Route 7, it is
very dark at night.

26-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:
Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



**Letter 27
Polly Gillette**



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by **July 9, 2013**.

Name Polly Gillette
Company/Organization _____
Address 1080 Park Blvd, Unit #6514
City San Diego State CA Zip 92101
Phone _____ E-mail _____

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

The Compass card needs to be available in the ticket machines
these machines need to be activated along the Rapid Transit Stations to help make the buses rapid

27-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:

Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



From: [Richard E. Pincus](#)
To: [Martin, Andrew](#)
Subject: Downtown Rapid Transit
Date: Tuesday, July 02, 2013 2:35:03 PM

Letter 28
Richard E. Pincus

Andrew Martin,

We wish to state our opposition to the Rapid Transit Plans. As downtown residents, we can see only threats to our health and property values. Broadway will lose its charm and gain nothing. Adding large vehicles to our already fragile core threatens to wipe out a decade of progress.

This a dreadful idea aesthetically (12' foot pylons, economically (property values plummet), and environmentally.

Rick and Arlene Pincus
1325 Pacific Highway, Unit 403

28-1

The Draft MND analyzes the potential environmental effects of the proposed project, including environmental issues that could adversely affect human health and safety, such as air quality, noise, and pedestrian safety. The Draft MND concludes that the proposed project would not result in any significant adverse effects to the environment. None of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would result in significant effects related to air pollution, noise, traffic, safety or other environmental issues. This comment does not raise any new environmental issues required by CEQA that were not already addressed in the Draft MND. Please also see Master Response 1 explaining that several BRT routes that would serve Downtown San Diego have already been approved by SANDAG, and are separate from the proposed project. No bus operations would occur as a result of the proposed project. Therefore, the proposed project could not result in any adverse effects associated with the operation of buses. Please see Master Response 2 addressing comments on property values.

The Draft MND concludes that the proposed project would not result in any significant adverse effects to the physical environment, including aesthetic effects. The Draft MND evaluates the potential significant aesthetic impacts of the proposed project using the criteria provided in Appendix G of the CEQA Guidelines. The Draft MND concludes that the proposed project would not have a substantial adverse effect on a scenic vista (7.1a), would not substantially damage scenic resources within a state scenic highway (7.1b), would not substantially degrade the existing visual character or quality of the site and its surroundings (7.1c), or create a new source of substantial light or glare that would adversely affect day or nighttime views (7.1d).

Figures 2-5 to 2-7 of the Draft MND visually depict the three Broadway stations both with and without the proposed project. SANDAG acknowledges that the proposed project would result in visual change to the project area, but as shown on the Draft MND figures and described in the analysis, the proposed project would not have a significant adverse aesthetic impact under any of the above criteria. Moreover, none of the comments provided on the Draft MND or other information in the record provide substantial evidence (as defined in Public Resources Code §21080[e]) that the proposed project would have a significant aesthetic impact.

From: theblonde@gmail.com on behalf of [Sharon Blasgen](#)
To: [Martin, Andrew](#)
Subject: new BRT stations in Downtown
Date: Saturday, July 06, 2013 8:59:47 AM

Letter 29
Sharon Blasgen

Your plan for the Downtown BRT stations is ill conceived and dangerous. I wish to register my protest against your plan and ask you to go back to the drawing boards on this. I have heard all your arguments and, frankly, they are not convincing. I don't know how you banbooled the City Council into believing that your ideas on this are worth of consideration. Please DO NOT go forward with the current plan.

29-1

29-1
This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

**Letter 30
Stacey Miller**

From: [Stacey Miller](#)
To: [Martin, Andrew](#)
Subject: No buses
Date: Friday, July 19, 2013 10:39:26 PM

30-1

Please Master Response 1 explaining there are no bus operations associated with the proposed project, and Master Response 2, which addresses comments on property values. This comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

This is a residential area. You will be hurting our property values having this pass.

30-1

No to buses. Really think you can find a commercial area for that.

Stacey Anistacia Miller
Www.staceymiller.com
Prudential Calif Realty
858-349-6626 Mobile
E Fax 858-436-1751
DRE #00871629

**Letter 31
Tanya Reid**



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by **July 9, 2013**.

Name Tanya Reid
Company/Organization Resident
Address 1240 INDIA ST UNIT 1804
City SAN DIEGO State CA Zip 92101
Phone 619-246-4908 E-mail Calibra@gmail.com

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

I have questions about the criteria used to select the lay-over lot and if residential property across the street is a consideration.

I also have a question about the ridership on the buses and the projections used to purchase the articulated buses.

31-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:

Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



From: [Tim Hull](#)
To: [Williamson, Jennifer](#)
Cc: [Martin, Andrew](#)
Subject: Downtown BRT open house/public meetings...
Date: Tuesday, June 18, 2013 2:04:19 PM

Letter 32
Tim Hull

Hi,

As a downtown resident, Im quite interested in the new Bus Rapid Transit services that will be coming downtown, and the new stations/stops that will go up along Broadway. However, your scheduling of the upcoming open house is unfortunately at the same time as the Downtown Community Planning Council meeting. Do you plan on holding any additional meetings? Also, what format will the meeting on Wednesday take?

Personally, I am excited by the idea of having new BRT routes offering convenient access to a wide part of the city (and beyond into Escondido and eventually east Chula Vista). I am a bit concerned that the designs of some of the routes may favor the commuter into downtown (as opposed as the commuter to Sorrento Valley/Mira Mesa/Rancho Bernardo) - particularly since that is the only direction express service will operate. Also, access to Sorrento Valley/Mira Mesa from downtown will require a transfer at UCSD/UTC (with no change to this planned in the future), which would make it less competitive with car travel. Finally, I am wondering what will happen to the existing bus routes on Broadway - will they use the stations, keep using existing stops, or be rerouted?

With that said, Im going to try and make part of your meeting on Wednesday, though Ill want to head over to DCPC in time for the Planned District Ordinance amendments. Let me know if you have any more public meetings on any of the BRT services or the BRT stations - I definitely want to learn more about the plans here...

Thanks,

Tim

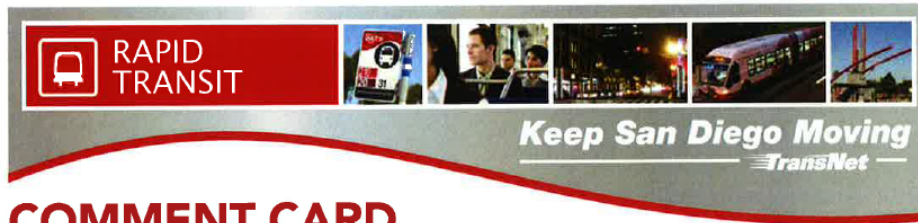
32-1

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

MTS regularly evaluates and makes changes to its bus service operations, including the location of bus stops and bus routes. When making changes, MTS provides advanced notification to its customers. As part of future evaluations of its operations, MTS may or may not decide to relocate existing bus stops or bus routes in Downtown San Diego. No decisions about bus stop or route locations or relocations on Broadway have been made at this time. In any event, decisions regarding the location and relocation of bus stops are under the authority of MTS and independent of the proposed project.

32-1

**Letter 33
Veronica D'Annibale**



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by **July 9, 2013**.

Name VERONICA M. D'ANNIBALE
 Company/Organization LIRA
 Address _____
 City _____ State _____ Zip 92101
 Phone _____ E-mail _____

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

WHILE QUESTIONS WERE ANSWERED THE ANSWERS TYPICALLY PROVIDED CONFLICTING INFORMATION.
SOME OF THE SANDAG AND/OR MTS REPS APPEARED UNINFORMED & REFERRED US TO OTHERS IN THE ROOM.
DOES SANDAG HAVE A TRAFFIC STUDY AT THIS TIME?

33-1

33-1

The Traffic Impact Technical Memorandum prepared for the proposed project was circulated for public review as Appendix D to the Draft MND. This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:

Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
 FAX: (619) 699-1905



Letter 34
Vicki Hoppenrath



COMMENT CARD

On June 10, SANDAG released for public review the environmental document for the Downtown Bus Rapid Transit Stations project. Called the Draft Mitigated Negative Declaration (MND), this document assesses potential environmental impacts that could result from the construction of the stations and physical improvements to the streets and sidewalks around them. The MND can be downloaded on the project website at www.sandag.org/downtownbrt. Written comments must be received by **July 9, 2013**.

Name Vicki Hoppenrath
Company/Organization _____
Address 1240 India St. #801
City SD State _____ Zip 92101
Phone 619-618-5434 E-mail vlhoppe@hotmail.com

Please add me to your list to receive updates via e-mail on the Downtown Bus Rapid Transit Stations project.

After talking to several presenters & asking similar questions to them, I found their answers to contradict each other. They seemed surprised that we had heard something different from another person in the room. Please educate all employees.

Thank you for not putting a stop in front of the India Hotel. I believe that Ron Roberts actually heard the owners request.

34-1

Comments on the environmental document also can be submitted in writing by mail, email, or fax to:

Andrew Martin, SANDAG, 401 B Street, Suite 800, San Diego, CA 92101
andrew.martin@sandag.org
FAX: (619) 699-1905



From: [Williamson, Jennifer](#)
To: [Martin, Andrew](#)
Subject: Fwd: Walter Scott Chambers III commented on SANDAG - San Diego Association of Governments's photo.
Date: Tuesday, June 18, 2013 7:51:45 AM

Letter 35
Walter Scott Chambers III

35-1

This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.


Sent from my iPhone
Begin forwarded message:

From: "De Korte, Joy" <Joy.DeKorte@sandag.org>
Date: June 18, 2013, 5:50:14 AM PDT
To: "Wade, Leslie" <Leslie.Wade@sandag.org>, "Williamson, Jennifer" <Jennifer.Williamson@sandag.org>
Subject: FW: Walter Scott Chambers III commented on SANDAG - San Diego Association of Governments's photo.

Hi, this comment was posted to the Downtown BRT post we did yesterday. If there is some info you want me to post about the bus stop designs let me know. Thanks, Joy

From: Facebook [update+kyqqynn@facebookmail.com]
Sent: Monday, June 17, 2013 4:38 PM
To: De Korte, Joy
Subject: Walter Scott Chambers III commented on SANDAG - San Diego Association of Governments's photo.

facebook

 [Walter Scott Chambers III](#) commented on [SANDAG - San Diego Association of Governments's photo](#).

Walter wrote: "What is bus stops were designed as sif they really mattered and the City cared about creating a great the Public Realm? http://switchboard.nrdc.org/blogs/kbenfield/what_if_bus_stops_were_designe.html"

Reply to this email to comment on this photo.

[See Comment](#)

35-1

This message was sent to jde@sandag.org. If you don't want to receive these emails from Facebook in the future, please [unsubscribe](#).
Facebook, Inc., Attention: Department 415, PO Box 10005, Palo Alto, CA 94303

**Letter 36
Wendy Reuben**

From: [Wendy Reuben](#)
To: [Martin, Andrew](#)
Subject: Concerns about SANDAG and the Downtown Public Transit Plan
Date: Sunday, July 07, 2013 10:38:08 PM

Dear Mr. Martin,

As a 5 year downtown resident and an over 35 year San Diego City resident who commutes, walks, and has worked in downtown, I am very concerned about the current plan BRT station plan that is being proposed. I completely agree with the Little Italy resident's associations concerns and hope that SanDag will think of the future and how important it is to have a quality of life for the residents.

Thank you. Wendy Reuben

36-1

36-1
This comment is noted and will be included in the public record for the proposed project. However, this comment does not raise any environmental issues that CEQA requires be addressed in the MND for the proposed project.