



The Coalition for Safer Trains
<https://safertrain.org/>
Angelina Nelia
Angie.neglia@gmail.com
(858) 945 8827

November 17th, 2025

Dear SANDAG, CEO Mario Orso and Honorable Members of the SANDAG Board:

The purpose of this correspondence is to highlight beneficial aspects of the LOSSAN railway realignment alternative in Del Mar termed the Northern Yellow Line (NYL). This alignment would minimize impacts to the local community, increase the utility of and access to the railway, provide the best long-term resilience to sea level rise, minimize impacts to the environment of the San Dieguito River and Lagoon, provide the greatest public safety, and directly benefit the Fairgrounds.

The Northern Yellow Line: A Community-Driven Rail Realignment

The NYL was proposed by a coalition of local community members following the release of the reissued Notice of Preparation (NOP) for the LOSSAN railway realignment project. During early planning stages, adverse impacts to the local community were given limited or no weight. As a result, the alternative realignments proposed by SANDAG staff and railroad interests in the original NOP disproportionately elevated speed and other rail interests over impacts to the local community. This was continued in the Value Analysis Study, which many concluded was a pretext for eliminating a route in the initial NOP disfavored by the Fairgrounds and Solana Beach. The Fairgrounds asserts in their response letter to the reissued NOP that since the NYL did not emerge from the Value Analysis Study, it lacks merit and should be dismissed out of hand. In contrast, the NYL received the strongest support from the community in public comment letters submitted to SANDAG. SANDAG should not dismiss this valuable public input out of hand. It should give the NYL the serious consideration it merits.

The Northern Yellow Line: Description of the Route

The NYL would begin on the west side of the Fairgrounds property adjacent to the San Dieguito River where a new Double Track Bridge and Special Events Platform is slated to be built with a track bed approximately 9 feet higher than the current track to protect against sea level rise.

At the southern end of the Special Events Platform, the NYL would curve easterly along the southern edge of the Fairgrounds property and the northern edge of the San Dieguito River on an elevated viaduct. This land is currently primarily used by the Fairgrounds for shipping container storage and a seasonal RV lot for its Fairgrounds workers, a use that could be continued under the viaduct¹. The Living Levee currently proposed to be constructed on the northern bank of the San Dieguito River by the City of Del Mar to help protect against flooding and sea level rise could also be accommodated and even

¹ https://docs.google.com/document/d/14CIE9f4ZeqJoZA3OHKbCyX-yg0dhbSezR4wUM-UMB-E/edit?usp=drive_link

improved to further protect the Fairgrounds². The City of Del Mar living levee documents show a 100-foot public easement along the north side of the river.

The viaduct would continue eastward to run adjacent to and above Jimmy Durante Blvd, a major transportation thoroughfare, and the southern edge of the Fairgrounds overflow parking lot and golf driving range. It would then curve southward over the San Dieguito River adjacent to Interstate 5 (I-5) to enter a cut-and-cover tunnel transitioning to a bored tunnel above the floodplain plus anticipated sea level rise³. The tunnel would continue adjacent to I-5 in the Caltrans right-of-way to a southern portal near Sorrento Valley. This portion of the route could be substantially similar to the corresponding portion of Alternative Alignment 10 from the Value Analysis Study⁴.

This alignment has many benefits over the alignments proposed by SANDAG staff and railroad interests, which would place a tunnel portal in or immediately adjacent to a residential neighborhood and business district and tunnel under numerous residential properties in Del Mar, taking homes, businesses, and subsurface easements by or under threat of eminent domain, or double track the Del Mar Bluffs.



The Northern Yellow Line: Benefits to Regional Transportation

Realignments developed by SANDAG and railroad interests include retention of a yet-to-be-built Special Events Platform adjacent to the western edge of the Fairgrounds. The Fairgrounds will not contribute to the cost of this despite being the primary beneficiary of it. It would only provide for public transportation to the Fairgrounds for revenue-generating events and would not otherwise contribute to regional transportation needs. The location of the Special Events Platform would also not provide useful

² https://docs.google.com/document/d/1mn4akpBnTM80O0zifkxFTTKAaNS5nMVGZInZzMD8Z2Q/edit?usp=drive_link

³ https://docs.google.com/document/d/1psor7GAGdMI6IZQ4CzaORvFxGX_Y-BAmFgIuvMOEYE/edit?usp=drive_link

⁴ https://docs.google.com/document/d/10dC2bxhNdNDmXYT4ItMlYozXjBp7Kw7mjCk4wIG96W4/edit?usp=drive_link

public transportation to the eastern side of the Fairgrounds property with its year-round facilities, including The Sound and Surf & Turf Recreational Facilities.

In contrast, the NYL could include a Special Events Platform on the southern edge of Fairgrounds overflow parking lot near the Surf & Turf Recreational Facilities, providing access to all Fairgrounds events. Even better, this station could become a full-time Fairgrounds Train Station, serving the Fairgrounds full-time, and serving the broader transportation needs of the region. Commuters could easily access this train station from I-5, increasing regional access to the LOSSAN rail corridor. Associated parking improvements could provide improved parking for Fairgrounds events and facilities year-round⁵. With full-time stations at both Solana Beach and the Fairgrounds, trains would naturally run slower between them, helping to limit noise and vibration impacts to Solana Beach, Del Mar, and the Fairgrounds. Any minimal impact on ridership from slower trains through this area would be mitigated by increased public access to a new train station at the Fairgrounds close to I-5.

The NYL could also serve as an initial step to a long-term goal of moving the entire rail corridor to the I-5 corridor, the best long-term strategy to minimizing community impacts of the entire rail corridor and protect it from sea level rise, rather than anchoring it to the immediate coast. Only one transportation corridor, not two, would need to be protected from sea level rise long-term, and the problematic railway through numerous coastal communities could eventually be entirely relocated, something all coastal communities should support.

The Value Analysis Study emphasized the importance of public stewardship, including preserving prior and ongoing investments in the LOSSAN corridor, which seemed to be a justification to not reconsider the location of a Special Events Platform. However, good public stewardship and decision making does not justify future decision making based on prior decisions. Instead, it considers current circumstances to make the best decision. The best location for an elective Special Events Platform should not be considered separately from the railway realignment.

The Northern Yellow Line: Resilience to Sea Level Rise

The NYL provides better protection from sea level rise⁶ than a tunnel under Del Mar or a double track on the bluffs. Alternative realignments proposed by SANDAG staff and railroad interests with a portal in the Del Mar hillside must traverse over the San Dieguito River at a height sufficient to account for both flooding and anticipated sea level rise, then immediately descend into a tunnel portal within a residential neighborhood⁷. These portals would have a low elevation and must be protected from flooding and sea level rise with floodwalls and a floodgate. They could not be raised or moved in the future without great expense, tethering the railway closely and likely irrevocably to the coast. Similarly, the proposed route with double tracks on the bluffs must be protected with extensive seawalls.

In contrast, the NYL would be on an elevated viaduct that could be designed with adaptive engineering to facilitate any necessary future increase in its height due to sea level rise⁸. Its tunnel portal adjacent to I-5 could be higher in elevation than the portals of other alternatives, providing better

⁵ <https://docs.google.com/document/d/18Zo1gWCt9zatMLWIXs4iqj2V19VGeKQjTtiGucVmvg/edit?usp=sharing>

⁶ <https://dot.ca.gov/caltrans-near-me/district-11/programs/district-11-environmental/i-5pwp-toc/appd>

⁷ https://docs.google.com/document/d/1zBFs2oWEEuYOYWORn7aUSPoDwaQB3UNh8TDfdZYiWjU/edit?usp=drive_link

⁸ https://docs.google.com/document/d/15adgSRCpa04f5nnziED8p-c9rlEVrwZNIX-q06IYHW8/edit?usp=drive_link

protection against sea level rise. After the portal, the track could continue to rise in the tunnel, providing positive drainage rather than requiring maintenance of a sump.

The Northern Yellow Line: Improved hydrology and ecology of the San Dieguito River and Lagoon

The NYL route would provide the greatest benefit to the hydrology and ecology of the San Dieguito River and Lagoon. The routes proposed by SANDAG staff and railroad interests all have a double track bridge across the San Dieguito River. This would be supported on concrete columns footed in the river and lagoon that would continue to obstruct the natural hydrology of the river outlet, with adverse effects on the ecology of the river and lagoon. In contrast, the NYL would not require a bridge across the terminus of San Dieguito River. Instead, it would cross the river where I-5 already crosses it without a requirement for any support structures footed in the river.

The Northern Yellow Line: Potential for Electrification and Limiting Greenhouse Gas Emissions

Since a portal and tunnel near I-5 would be less constrained by height, it could be high enough to allow for electrification, providing the opportunity to reduce greenhouse gas emissions in the future through electrification of the railway. It could also be a single bore tunnel, possibly requiring less greenhouse gas emissions to construct than two parallel tunnels and providing for easier construction and maintenance. Proximity to the I-5 corridor would lessen emission of greenhouse gases during construction associated with hauling construction material to and from the project site. I-5 could possibly be modified with a dedicated ramp to allow direct access to the portal construction site.

The Northern Yellow Line: Limiting Visual Impacts

Relocation of the Special Events Platform will improve scenic views over the railroad track west of the Fairgrounds property, including views from future structures on the Fairgrounds property. The Fairgrounds could take advantage of this improved view corridor in its Master Plan. Removal of the bridge over the San Dieguito River will open scenic vistas over the San Dieguito River from Camino Del Mar and the southern bank of the river where a recreational trail currently exists.

The Northern Yellow Line: Limiting Air Pollution, Noise, Vibration, and Adverse Effects on Public Health

Locating a tunnel portal in or adjacent to a residential neighborhood would concentrate air pollutants generated throughout the tunnel length in these residential neighborhoods. This would be exacerbated by locating the portal upwind of the prevailing wind direction in relation to the residential neighborhood, as a tunnel portal in the Del Mar hillside would do. Locating tunnel portals in residential neighborhoods also concentrates noise and vibration impacts in these residential neighborhoods. These impacts will be amplified as trains enter and exit the portal at high speeds (“piston effects”). Vibration can cause structural damage to buildings. Similarly, locating the Special Events Platform upwind of the Fairgrounds would concentrate air pollution, noise, and vibration from idling trains at the platform onto the Fairgrounds main campus.

In contrast, the NYL would locate the northern portal adjacent to the I-5 corridor, where air pollution, noise, and vibration are already generated, and where no residential neighborhoods are closely located downwind. The tunnel for the NYL could also accommodate ventilation shafts along its length, helping with dispersion of air pollution from the trains. Similarly, locating the Special Events Platform farther from the Fairgrounds main campus would help limit air pollution, noise, and vibration impacts on the Fairgrounds from idling trains boarding passengers.

Concentrating air pollution, noise, and vibration in residential neighborhoods will adversely affect the health of nearby residents. Air pollution irritates the eyes, exacerbates respiratory illnesses, and can contribute to lung cancer. Noise and vibration inhibit peaceful rest and sleep, cause stress and negatively impact mental health, and exacerbate cardiovascular disease⁹.

The Northern Yellow Line: Minimizing Community Impacts

The impact of a portal in the Del Mar hillside neighborhood would be devastating to this neighborhood. There would be substantial eminent domain of residential and business properties, with displacement of families and businesses. There would be substantial negative effects from air pollution, noise, and vibration on what would remain of this residential neighborhood. Portals in residential hillside neighborhoods risks bluff failure. Tunneling under homes risks structural damage from subsidence. Tunnel boring machines can get stuck and require removal from above¹⁰.

In contrast, the NYL would site the tunnel portal adjacent to I-5 where eminent domain would not be required, where there are already air pollution, noise and vibration impacts from the freeway, where the nearest downwind residential properties are distant, and where there would not be the risks associated with portals and tunnels in and under residential neighborhoods.

The Northern Yellow Line: Improved Public Safety

Alternative realignments proposed by SANDAG staff and railroad interests keep a portion of the railway on the ground, increasing the risk of injury and death to trespassing pedestrians¹¹. The number one goal for SANDAG and Rail Stakeholders is to eliminate road grade crossings in the center of our communities.

In contrast, the NYL would locate the railroad tracks on an elevated viaduct throughout its course through the San Dieguito River Valley, dramatically improving safety by reducing the risk of pedestrian trespassing.

The Northern Yellow Line: Impact on the Fairgrounds

The City of Del Mar is not the cause of sea level rise, bluff erosion, and the need to move the railroad track. It should not be required to bear the vast majority of the burden of the railroad realignment, as the realignment alternatives proposed by SANDAG staff and railroad interests would require.

The Fairgrounds will benefit significantly from public dollars spent on the addition of a Special Events Platform, which will only provide public transportation to the Fairgrounds for its revenue generating events. Despite this benefit, the Fairgrounds objects to any railway realignment that requires any contribution of its state-owned land, preferring instead that residential properties and private businesses in the City of Del Mar bear the burden, including being taken by eminent domain.

The Value Analysis Study had a goal of minimizing negative effects on economic generators of the region, but only specifically recognized the Del Mar Fairgrounds as an economic generator. This ignores

⁹ https://docs.google.com/document/d/1Jl6YgcA64dl-JOyFxoHyympJMMjOCXbWIRUSYWG0A-o/edit?usp=drive_link

¹⁰ <https://docs.google.com/document/d/1NcrLyq4DRal2JEao2XqRihcE5Q79kP4yenTThhrA7RI/edit?usp=sharing>

¹¹ <https://drive.google.com/file/d/1FrQtPMEPbmnpMd-KV1I8UUK-A5wEjFlw/view?usp=sharing>

that the City of Del Mar is also a regional economic generator with its many businesses, tourism, government spending, and property tax revenue.

The Fairgrounds asserts the NYL would prevent it from holding the San Diego County Fair and severely limit its operation as a business. This is a marked exaggeration. The Fairgrounds is a 340-acre property owned by the State and managed for the benefit of the people of California. Much of it is largely unused for long periods of time. Its ground level parking inefficiency uses a substantial portion of its land for parking. The NYL would occupy only a peripheral sliver of its land. The railroad tracks would be elevated on a viaduct, and the land under this could be used largely as it currently is, such as for parking and storage.

The small amount of land at the periphery of the Fairgrounds required for the NYL is a more reasonable option than taking privately owned homes and businesses, placing a train tunnel portal in a residential neighborhood and a tunnel under residential properties or double tracking the bluffs, and severely impacting economic generation by the City of Del Mar. The Fairgrounds could directly benefit financially by selling or leasing the land required for the NYL to SANDAG.

The mission of the Fairgrounds includes a commitment to serving the community and being stewards of the environment. Nevertheless, the Fairgrounds response letter to the reissued NOP asks SANDAG to eliminate the NYL, an alternative that minimizes impacts to the community and is arguably better for the environment, before it is even studied. The intent of CEQA and NEPA is to inform decision makers of the environmental impacts of project alternatives before choosing which alternative to implement. The Fairgrounds should support this intent, including study of the NYL.

The Fairgrounds is currently considering developing affordable housing on its property, including on the eastern portion of its property. Affordable housing sited near a Fairgrounds Train Station in this same area would support the goal of the State of California of siting affordable housing near major public transit stops. Community input to the Fairgrounds Master Plan prioritized improvements to parking and public transportation access to the Fairgrounds. The NYL would best meet these goals by providing a Fairgrounds Train Station in a central location with associated parking improvements.

Conclusion

The NYL alignment would minimize impacts to the local community, increase the utility of and access to the railway, provide the best long-term resilience to sea level rise, minimize impacts to the environment of the San Dieguito River and Lagoon, provide the greatest public safety, and directly benefit the Fairgrounds. SANDAG and other stakeholders should give the NYL the serious consideration it merits.

California is the 5th largest economy in the world, and needs a resilient, reliable cohesive transit system. The alignment should not stay locked on the far west side of the county, instead it needs to be where the population lives and works. We need to take advantage of the land along the freeways to build the rail alignment which has the least impact to our communities.

We appreciate the transparency and collaboration the SANDAG Engineering Team has shown working with the Coalition for Safer Trains, to find the best solution for all stakeholders and minimize the impacts to our communities, for our long-term future generations.

Your sincerely,

Angelina Neglia

Angelina Neglia

Leader of the Coalition for Safer Trains

Cc: Maria Rodriguez Molina, SANDAG, Director of Mega Projects, Border and Goods Movement
Keri Robinson, SANDAG, Senior Regional Planner
Keith Greer, SANDAG, Deputy Director, Environmental Compliance & Climate
Del Mar City Council
Ashley Jones, Del Mar City Manager
Mike Halpern, Chair Torrey Pines Community Planning Board
Senator Catherine Blakespear
Governor Gavin Newsom
Congressman Mike Levin
Diana Kutlow, Senior District Representative for California State Senator Catherine Blakespear
Alex Davis, Principal Consultant for the Senator Transportation Subcommittee on LOSSAN Rail Corridor Resiliency
Kyle Krahel-Frolander, Deputy Chief of Staff & District Director for Congressman Mike Levin
Sean Duffy, Secretary Department of Transportation
Toks Omishakin, Secretary of Transportation for California, CA State Transportation Agency
Jim Desmond, San Diego County Supervisor
David Fink, Federal Railroad Administrator (FRA)
Mayor of San Diego, Todd Gloria
Tasha Boerner, Assembly Woman
Terra Lawson-Remer, Board Chair, San Diego County Board of Supervisors
Joe Houde, Chair of the Executive Committee, Sierra Club North County Group, San Diego
Pam Heatherington, North County Group Representative, Sierra Club San Diego Chapter