



League of Women Voters

North Coast San Diego County

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lwnncsd.org

Shay Lynn Harrison, Environmental Analysis Branch Chief
CA Department of Transportation – District 11
Division of Environmental Analysis, MS 242
4050 Taylor Street
San Diego, CA 92110

Dear Ms Harrison:

We are writing to inform you that the North Coast San Diego County League of Women Voters (LWV) cannot support the current Interstate-5 North Coast Corridor Project EIR. The decision is based on adopted LWV positions. The reasons are:

1. It does not discuss the potential environmental or health effects of green house gas (GHG) emissions and air particulates that will result from the project. It also does not provide quantitative data of expected GHG or particulate levels.
2. There is no discussion of how the project will impact our ability to meet the standards set by AB32 and SB375.
3. The development process was flawed because it did not solicit greater public input and acceptance early in the process.
4. There is a lack of transparency in the financing of the project.
5. Viable alternatives, such as the high-speed rail system, behavioral changes, or mass transits are not considered as options.

An issue of grave concern is a lack of thoughtful discussion on the environmental, social, and economic effects of this huge project. Without this discussion, it is impossible to determine whether the benefits of this project outweigh the environmental, social and economic costs.

The LWV of the United States holds the action policy that global climate change poses “one of the most serious threats to the environment, health and economy of our nation. Recent scientific studies show that global warming is already causing environmental changes that will have significant global economic and social impacts.”

http://www.lwv.org/AM/Template.cfm?Section=Global_Climate_Change. Since 2007 there has been broad scientific consensus that in order to avoid the worst effects of global warming, we must dramatically reduce green house gas (GHG) emissions to 1990 levels by 2020. In response to this dire warning, California passed AB 32 in 2006, and SB 375 in 2008. The project, as proposed in the EIR, does not reflect current environmental and legislative realities. The EIR does not delineate impacts on GHG and particulate emissions nor does it present a plan for their mitigation. It does not address how the projects

will comply with AB 32 and SB375. Since approximately 70% of GHG emissions and primary source of particulate emissions in the north coast corridor are due to traffic, the current project will likely prevent our area from achieving our GHG emissions reduction goals. The proposed expansion will only exacerbate the negative health and environmental impacts of GHG and particulates in our region.

The economic consequences of a 3.5 – 4.5 billion dollar project warrant a thorough discussion of finances. The EIR does not clearly delineate where the project funds will come from. A significant proportion of the funding is expected to come from the TransNet tax. Currently, however, the actual amount being collected does not meet projections. The EIR should discuss financing contingencies. In addition, how will this huge expenditure affect funding for future mass transit development? SANDAG is preparing a regional transportation plan for 2050 that has a significant mass transit component. Given the projected 40-year construction time for the I-5 expansion project, how will this impact the 2050 plan implementation? Would it not be prudent to look to the future and focus on rapid mass transit rather than this outdated method of transportation?

The balance of our concerns is based on positions articulated in the LWV of California Transportation Position <http://ca.lwv.org/lwvc/issues/natres/trans.html>. In brief, the position states that it is the role of the “transportation system to move people and goods which includes a variety of transportation modes, with emphasis on increased public transportation services and other viable alternatives to reduce vehicle miles traveled (VMT); is efficient, convenient and cost effective; is safe and secure; serves all segments of the population and diverse geographic needs; minimizes harmful effects on the environment; is integrated with land use; and is supported by extensive public education.” The current project, as described in the EIR, falls far short of the prudent and well-reasoned position espoused by the League of Women Voters of California.

Specifically, the process did not provide for early and informed public participation in the planning process. Regional planners did not solicit or incorporate extensive local input into the project. This lack of citizen input can be measured by the furor expressed by local governments and their citizenry when the EIR was released. At Town Hall meetings in Solana Beach, Encinitas, Oceanside, and Carlsbad, citizens have voiced surprise at the size of the project, which reflects a lack of public education. Although the project was originally approved by local city councils in 2001, the cost and scope of the project have been drastically altered from a 13-year, 20-mile project costing \$516 million dollars to one expected to take 40 years, extend 27 miles and cost 3.5 to 4.5 billion dollars. Recently (September, 2010), a survey of 1200 individuals, conducted for the San Diego Foundation found that only 32% surveyed supported expansion of roads and highways, whereas 55% supported expansion of public transit, including buses and rail. The survey results clearly reveal a lack of citizen support for this project. http://www.sdfoundation.org/Portals/0/Newsroom/PDF/PressReleases/320_425PolicyMemoFinal.pdf

The League position is that transportation planning should promote reduced VMT and facilitate use of transit and other alternatives to single occupant vehicles. While this project does incorporate HOV lanes, it does not discuss the logistics for most efficient use of the HOV by mass transit buses. Neither pricing nor linkage to local transit systems is addressed. The EIR mentions possible methods to influence travel behavior through tolls or fees, but does not address the impact of the fees nor mitigation measures for low-income persons. The EIR does not discuss other possible strategies to improve traffic flow, such as flextime and telecommuting. The EIR does not discuss the ramifications of SB375, the bill that couples land use planning and transportation use. The intent of this law is to promote shorter commutes by building new homes in areas near urban centers. This would reduce urban sprawl and obviate the need to build new highways to outlying suburban areas. It would also enhance the need for greater public transportation options within cities. The San Diego Foundation survey mentioned above found that 70% of the voters supported a regional plan by SANDAG that fulfills the goals of SB375.

In conclusion, Interstate-5 North Coast Corridor project lacks the vision and innovation we would expect from a project of this scope, cost and duration. San Diegans merit a transportation system that reflects a paradigm shift in transportation. Speed is important, but a sustainable environment is paramount.

Sincerely,

Diane Mochizuki
Natural Resources Director
League of Women North Coast San Diego County

cc: City Councils of Del Mar, Solana Beach, Encinitas, Carlsbad, Oceanside, Vista; San Diego Association of Governments Board of Directors