



SAVE OUR FOREST
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May 27, 2011

Via Electronic Mail

The Honorable Senator Kehoe
2445 Fifth Ave., Suite 200
San Diego, CA 92101

Re: Senate Bill 468 (Kehoe), As Amended

We understand that elected officials and even the environmental community often feel pressured into compromising their position on certain legislation in an effort to gain other concessions. As regards SB 468, it has been suggested that the San Diego community should support the widening of highways (e.g., Interstate 5) in order to obtain transit projects (i.e., a multi-modal approach to transportation). Yet, any decision to pursue increases in highway capacity rather than transit along important corridors such as I-5 will: (1) set the San Diego region back in its compliance with climate change legislation mandates and goals; (2) increase vehicle miles traveled; (3) thwart efforts to increase transit ridership; (4) sabotage efforts local jurisdictions are taking to promote infill, transit-oriented developments; (5) adversely affect residents along the I-5 corridor; and (6) otherwise greatly degrade the environment. Moreover, the transit projects that are perceived to be concessions are already contemplated to be implemented in SANDAG's draft 2050 revenue constrained Regional Transportation Plan (RTP) and thus are not, in any way, dependent on this amended bill. Consequently, CNFF and SOFAR cannot support SB 468, as amended.

As you so aptly recognized when you authored the original bill, the appropriate approach to meeting San Diego's regional future transportation needs is to build out the region's transit network prior to any increases in highway capacity. The I-5 corridor is tailor-made for successful transit. The Coaster already runs along this corridor; consequently, the right-of-way for a second rail track already exists. The Coaster is a vital link, connecting most of the city centers in the region by rail. To the south, the Coaster connects with the heart of the region, downtown San Diego. To the north, it connects with the Sprinter which runs inland to Vista, San Marcos and Escondido.

Widening I-5 is simply not necessary. Transportation experts have reviewed the environmental impact report/environmental impact statement (EIR/EIS) for the I-5 project and have determined that increased

highway capacity is not needed to accommodate future growth in the region. As a report prepared by Smart Mobility Inc. demonstrates, the EIR/EIS substantially overestimates the need for the project since it Caltrans assumes that I-5 traffic volumes will increase at about twice the rate forecast in SANDAG's 2007 RTP¹. Furthermore, traffic volumes in San Diego County as in the rest of the U.S. have been flat to slightly declining since 2005. Total interstate vehicle miles traveled in San Diego County were 3.3 percent lower in 2007 than in 2006² and were also lower still in 2008 (the last year for which data are available).

Moreover, SANDAG has substantially understated the potential for transit to succeed in the region. A critique of SANDAG's transportation modeling shows that SANDAG underestimated the increase in transit ridership in 2050 because it incorrectly assumed that only low-income residents would ride transit, regardless of the quality of transit service³. Clearly, as is evident by the San Francisco Bay Area public transportation ridership, middle and high-income residents ride transit, especially high-quality transit. Given Caltrans' faulty traffic projections and SANDAG's incorrect transit ridership assumptions, it simply makes no sense to widen this freeway now, prior to gauging the effect that a fully integrated transit system along the I-5 corridor would have in achieving transit ridership.

The region has given Caltrans' and SANDAG's highway-oriented approach to transportation a fair chance. Quite frankly, it doesn't work. Caltrans' I-5 EIR/EIS never even bothered to consider any non-freeway widening alternatives. Wouldn't an appropriate first step be to demand that Caltrans (and SANDAG) at least study an I-5 corridor alternative that assumes only increases in transit capacity rather than any freeway widening? How will we know if no one bothers to study this environmentally sustainable approach?

In conclusion, for the foregoing reasons, we respectfully request that SB 468 be tabled until such time as Caltrans and/or SANDAG are required to conduct the necessary study to determine whether a fully integrated transit network along the I-5 corridor is sufficient to meet future transportation demand.

Sincerely,



Save Our Forests And Ranchlands (SOFAR)

Duncan McFetridge, President

Cleveland National Forest Foundation (CNFF)

Duncan McFetridge, Ex Officio

¹ CNFF Comments: Reivew of Interstate 5 North Cost Project, November, 2010:

http://www.transitsandiego.org/transitsandiego/pdf/EIR_Comments_I5_Widening.pdf

² Caltrans, 2006, 2007 and 2008 *California Public Road Data: Statistical Information derived from the Highway Performance Monitoring System* (HPMS): Daily Vehicle Miles of Travel. For Interstate system in San Diego County 2006: 27,669,000, 2007: 26,736,510, 2008: 26,517,790.

³ CNFF Comments re: Land Use Modeling Practice and Trends, March 9, 2011:

http://www.transitsandiego.org/transitsandiego/pdf/SOFAR-CNFF_Comment_Letter_Transportation_and_Land_Use_Modeling.pdf