



P.O. Box 871
Oceanside, CA 92049
www.DEMCCO.org

August 17, 2015

Board Members and Alternates
San Diego Association of Governments
In Care of Board Clerk Tessa Lero
401 B Street, Suite 800
San Diego, California 92101
Via Email to tessa.lero@sandag.org; pio@sandag.org; comments@sandag.org ;
Andrew.martin@sandag.org

Re: Our Opposition to *San Diego Forward*, SANDAG's Proposed Regional Transportation Plan for 2015

Honorable Chair Jack Dale and Members and Alternates of the Board:

Introduction

The Democratic Club of Carlsbad and Oceanside (DEMCCO) appreciates the opportunity to communicate with you concerning this important topic, as you focus on whether or not to approve your proposed Regional Transportation Plan for 2015, *San Diego Forward* (the "proposed Plan"). We oppose the proposed Plan because it fails to achieve climate stabilizing targets, it expands freeways, and it increases the negative health impacts of air pollution.

Background Regarding DEMCCO's Opposition to the Proposed Plan

For many years, DEMCCO members and guest speakers have discussed climate change and transportation. We have adopted climate-transportation resolutions. In 2013 the California Democratic Party (CDP) adopted a resolution that all Democrats should work for regional transportation plans that support climate stabilization, <http://www.cadem.org/resources/resolutions?id=0686>. Given the urgency of our climate crisis, we feel a responsibility to act.

Climate Considerations

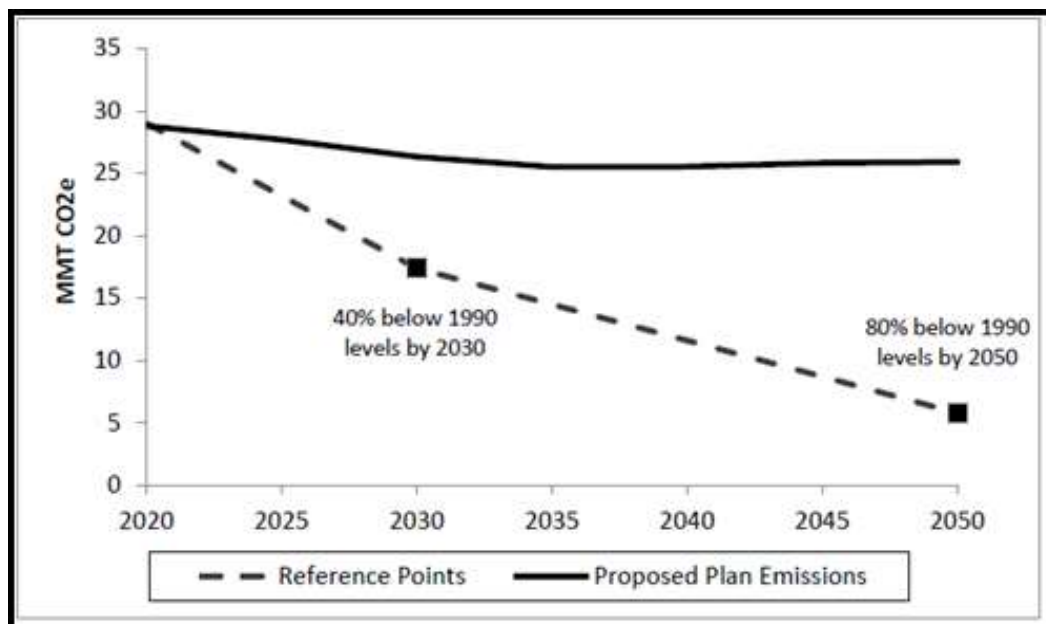
Since Greenhouse gas (GHG) emissions are proportional to vehicle miles travelled (VMT), Table 1 is an important indication of the proposed Plan's climate performance. Table 1 is constructed based on unambiguous statements about the relationship between VMT in the proposed Plan and VMT in the California-Environmental-Quality-Act-required (CEQA-required) "No Project" case. These statements appear in in Table 6.0-3 of the draft environmental impact report (DEIR) of the proposed Plan, on pages 6-64 and 6-65. The Table shows that the \$168 billion dollar proposed Plan reduces driving by less than 1% in 2020 and less than 2% in 2035. To support climate stabilization, much larger reductions in driving are needed.

Figure 1 is taken directly from the DEIR of the proposed Plan, specifically its Figure 4.8-1. It shows that the proposed Plan fails to support our state's climate mandates, Governor's Executive Orders S-3-05 and B-30-15. Given this fact, the proposed Plan most certainly fails to support climate stabilizing targets.

Table 1 Climate Performance of the Proposed Plan

| Proposed Plan's Climate Performance, VMT per Year | | | | |
|---|------------|---------------|---------------------------|--------------|
| Year | No Project | Proposed Plan | Proposed Plan's Reduction | |
| | | | net | Per-cent |
| 2020 | 82,157,143 | 81,557,143 | 600,000 | 0.73% |
| 2035 | 91,007,647 | 89,307,647 | 1,700,000 | 1.87% |

Figure 1 Proposed 2015 Regional Transportation Plan Emissions and Emissions of Executive Orders B-30-15 (Dashed Line from 2020 to 2030) and S-3-05 (Dashed Line from 2030 to 2050)



Neighborhood Harm

Oceanside and Carlsbad have many neighborhoods that will be harmed by widening Interstate 5 (I-5) from 8 to 12 lanes. Many years ago, by a unanimous vote of both our Executive Board and those attending a general membership meeting, we approved a resolution in opposition to that project. Considering the Los Angeles experience of continually widening freeways, we believe that the traffic-growth inducement of such an expansion means that if all other factors were to be kept equal, the congestion would only be expanded, from 8 congested lanes to 12 congested lanes. If I-5 is expanded and State Route 78 (SR-78) is expanded, as described in the proposed Plan, then the interchange between them would need to be expanded. Figure 2 was constructed based on the primary Caltrans proposal to expand the interchange. Those “flyover” lanes would be about 300 feet from South Oceanside Elementary School. They would project both air pollution and noise into the school. We do not understand how anyone could support such a project, anywhere. We would not want that for our school children and we would not want that for anyone’s school children.

Figure 2 Proposed Western Flyover Lane, Serving an Expanded I-5 – SR-78 Interchange, Looking East on Cassidy, From Across the Street from South Oceanside Elementary School



Air Pollution Considerations

Air Quality Recommendations for Local Jurisdictions is a published report that discusses the advisability of locating new schools, housing and other land uses in proximity to freeways. It is provided by the Heath Department of the County of Los

Angeles: <http://publichealth.lacounty.gov/eh/docs/AQinFreeways.pdf>. It states that the California Air Resources Board (CARB) recommends that schools be located at least 500 feet from freeways because traffic pollution is associated with exacerbation of asthma, onset of childhood asthma, non-asthma respiratory symptoms, impaired lung function, reduced lung development during childhood, and cardiovascular morbidity and mortality. Oceanside High School and South Oceanside Elementary School are located well within the 500 feet criterion. Obviously, a 12-lane freeway would be worse than an 8-lane freeway. Besides this, Figure 2 shows that the introduction of the proposed fly-over lanes would reduce the school-to-freeway distance for South Oceanside Elementary School.

The proposed Plan freeway expansions may look harmless, as depicted in the various county-wide figures in your documentation. However, when considered from the standpoint of adjacent neighborhoods, they are devastating.

Conclusion

Please do not approve the proposed Plan. We request a regional transportation plan that supports climate stabilization and does not expand our current freeway system.

Thank you for your leadership.

Sincerely,



Ken Clarence
President



760-603-8600

kenclarence@yahoo.com