Attachment 3

CARMEL VALLEY COMMUNITY PLANNING BOARD
Attn: Allen Kashani, CVCPB Secretary
6025 Edgewood Bend Court
San Diego, CA 92130
858-794-2571 / Fax: 858-794-2599

October 28, 2010

Shay Lynn M. Harrison, Chief Environmental Analyst, Planning Branch C
California Department of Transportation, District 11, MS242
4050 Taylor Street
San Diego, CA 92110

Subject **I-5 NORTH COAST CORRIDOR PROJECT DRAFT EIR/EIS**
(I-5 Improvements: 27-Mile Widening from La Jolla Village Dr. to Harbor Blvd. in Oceanside)

Dear Shay:

The Carmel Valley Community Planning Board represents the residents, retailers, and workers directly east of I-5 from south of Carmel Mountain Rd. to the community limits to the north abutting the San Dieguito River Valley. The board also is the acting planning board designated by the City of San Diego Planning Commission and City Council to make recommendations to those bodies on land use issues in the North City Future Urbanizing Area Subarea II in the absence of residences, businesses, and commercial/office uses in that area and in lieu of a voter-approved subarea plan.

Overview

In its almost exclusive focus on the personal automobile, the "I-5 North Coast Corridor Project" DEIR/DEIS is in conflict with all relevant transportation policies and land use plans in the region. While other policies and plans call for balanced, multi-modal transportation corridors, this plan can only suggest that the completed project might eventually lead to a mass transit system. While there are many models for an efficient, multi-modal transit system, CalTrans chooses to not embrace them. Thus, the DEIR/DEIS remains relatively free of real analysis of what a massive investment in transit might accomplish, and the impacts of transit solutions are depicted as minimal.

When reading the DEIR/DEIS, one should consider the value of the corridor, in its impact on tourism, and its effect on the health and well being of the local population. It appears that the project would relegate the term "Coastal Corridor" to the history books, leaving only a concrete canyon that could just as well be in the middle of Los Angeles as in coastal San Diego.

Each of the "Build Alternatives" would significantly change the character of the I-5 coastal corridor throughout its 27-mile length; yet, the DEIR/DEIS fails to assess the project's impacts on communities. The urbanizing impacts of the massive additions of lanes, walls, ramps, and bridges on these communities should be addressed, from the point of view of the resident living on the edge of an enormous sea of asphalt, and from the psychological impact on visitors arriving in these communities through gaps in the concrete edifice of the sound walls.

Even with this multi-billion addition to our community, studies show that the project is doomed to failure. Given the considerable research into similar projects showing that the benefits of expanded freeway capacity themselves generate more traffic, it seems clear that this would be money badly spent. CalTrans needs to include references to these studies and defend why they should be ignored out-of-hand.

Given the impacts to the coastal environment, to visual and aesthetic values, to communities, to noise and air qualities, and given the questionable success of reducing congestion with alternatives such those proposed, CalTrans and other transportation planners should begin anew with fresh ideas and/or new planners and engineers that would not totally and negatively transform the coastal corridor. CalTrans must re-think its role in shaping solutions to transportation problems, moving away from the automobile-centric answers and towards more creative and modern solutions.

Our comments on the I-5 proposal are in two parts:

A. SUMMARY OF CONCERNS WITH THE ACCURACY AND FINDINGS OF THE DEIR/DEIS AND WITH "THE I-5 NORTH COAST CORRIDOR PROJECT" (THE PROJECT") IMPACTS

B. DETAILS OF CONCERNS AND TEXT REFERENCES

A. SUMMARY OF CONCERNS WITH THE ACCURACY AND FINDINGS OF THE DEIR/DEIS AND WITH "THE PROJECT" IMPACTS

I. <u>The four "build alternatives" reflect no comprehensive regional transportation solutions to traffic congestion because they perpetuate automobile use and relegate mass transit to some vague future:</u>

- They ignore innovative transportation solutions being sought and accomplished in major cities and regions elsewhere;
- They are inconsistent with the "Mobility Element" of the <u>San Diego General Plan (2008)</u> in which the overall "Purpose" is "To improve mobility through development of a balanced, multi-modal transportation network...that gets us where we want to go and minimizes environmental and neighborhood impacts." (ME-3);
- They are inconsistent with the <u>Carmel Valley Community Plan</u> whose overall "Planning Principle" is that future communities (such as then "North City West") "should carefully consider locations that can most readily accommodate and support realistic future alternative modes of transit other than the automobile."
- They are inconsistent with SANDAG's current "Regional Transportation Plan (RTP) and "North Coast Transportation Study" which holds that because of the high increase in the I-5 corridor (a regional concern) and "Given the constraints on I-5, the coastal rail and parallel arterials, (all of the transportation agencies) concurred that a corridor-level study was needed to address the long-range needs of this <u>multi-modal</u> transportation corridor (emphasis added.) [Chapter 1, pp. 1-9]

II. <u>Each build alternative would change the character of the coastal region and communities by virtue of high retaining walls, noise abatement walls and, as the DEIR/DEIS points out, the widened freeway would be experienced as double the current size. The DEIR/DEIS accurately states that this project would change the corridor from a suburban to an urban setting. There are significant and unmitigable environmental consequences, which are judged inconsequential in the document.</u>

- The most significant and unmitigable "Environmental Consequence" of all four "Project" build alternatives would result in highly adverse changes to the existing visual and aesthetic environment along the project corridor.
- "The natural character of the I-5 corridor would become noticeably more urban, and scenic resources now available to the traveling public would become less visible." (S.5, p. S-3) Mitigation for this impact is not possible, only future roadway design ideas, such as bridge abutments, are offered as tools to minimize impacts.
- The entire "Project" is presented as the only way to manage congestion in the region even though the character of each community in the corridor will be strongly urbanized and each community will become isolated by large barriers.

III. **"The Project" could likely return the corridor to failed levels of service (LOS) from 5-10 years after completion.**

- Each build alternative is seen to achieve "The Project" purpose and need: to "Improve travel times in the corridor" and "Provide a facility that is compatible with future bus rapid transit and other modal options;"
- The Torrey Pines Community Planning Group has uncovered numerous source studies, which contradict the philosophy that building more roadways solves congestion. In fact, some studies indicate that as "'road capacity increases, the number of peak-period trips also increase until congestion again limits further traffic growth.'"

IV. **Given the impacts to the coastal environment, to visual and aesthetic values, to communities, to noise and air qualities, and given the questionable success of reducing congestion with these alternatives, Caltrans and other transportation planners should begin anew with alternatives which would not totally alter the coastal corridor.**

B. DETAILS OF CONCERNS AND TEXT REFERENCES

I. **The Four "Build Alternatives Reflect No Comprehensive Regional Transportation Solutions To Traffic Congestion Because They Perpetuate Automobile Dependence and Use and They Relegate Mass Transit To Some Vague Future. They require from $3.3 to $4.3 million and no source of future funding for a mass transit system is identified. They are inconsistent with major local and state land use policies.**

(1) They ignore innovative transportation solutions being sought in major cities and regions elsewhere:

"The Project" alternatives described are: (1)"'10+4 with barrier' (a total of ten main lanes with four HOV/managed lanes contained in the median with barrier)"; (2) "'10+4 with buffer' (a total of ten main lanes with four HOV/managed lanes contained in the median with a painted stripe separation in lieu of a barrier)" (3) "'8+4 with a buffer' (a total of eight main lanes with four HOV/managed lanes contained in the median with a painted stripe separation)"; (4) '8+4 with barrier' (a total of eight main lanes with four HOV/managed lanes contained in the median with barrier in lieu of painted stripe buffer)" and (5) "the 'No Build' alternative." (p. 2-1)

"The Project" is to more than double the I-5 footprint for 27 miles to provide more room for cars. Vague references are made to future mass transit using the additional lanes but this project is solely for trucks, private busses, and cars. The project "Purpose and Need" are "To Improve travel times in the corridor" and to "Provide a facility that is compatible with future bus rapid transit and other modal options." (S-2)

Further, absent is documentation on funding for future North County Transit District or Metropolitan Transportation Systems mass transit components. Will the TransNet tax funds be available when billions of that essential funding source are allocated to this "Project?"

All previous studies leading up to "The Project" (included in this term are the five alternatives), including "input from...the NEPA/404 MOU integration process, and public scoping information", resulted in "The Project" overall goal:

> "...to provide the full range of transportation modal alternatives that are cost-effective, promote and provide incentives for ridesharing and alternative modes, accommodate regional and interregional freight movements, minimize environmental and community impacts." (2.1)

"Transportation System Management (TSM)" and "Multi-Modal and "Transportation Demand Management (TDM Alternatives"] include strategies to maximize efficiency of the existing I-5 (ride-sharing; replacing stop signs with traffic signals at intersections to improve peak hour flow; "integrating multiple forms of transportation modes, such as pedestrian, bicycle, automobile, rail, and transit"; "promoting mass transit..." (2-12)

These techniques, however, "could not satisfy the purpose and need of the project", so, the freeway widening build alternatives were chosen.

The DEIR/DEIS is flawed in not explaining why these multi-modal and TDM alternatives were not included since the overall "Project" goal was to improve traffic congestion by 2030 using multi-modal transportation. We are provided no data of how much more efficient I-5 would be by incorporating mass transit now on even portions of I-5.

A major flaw in logic in the environmental document's rationale for widening I-5 to reduce congestion is the assumption (a correct one) that this widening will make it more enjoyable to drive one's car in this corridor. Since a major goal of "The Project", of SANDAG's Regional Transportation Plan (a priority of which is a multi-modal system that is fast, reliable, and pleasurable to use), and numerous transportation plans both local and State is to motivate people to get out of their cars and use some level of mass transit how does an (we think temporary) improvement in LOS motivate people to opt for mass transit?

The DEIR/DEIS concludes that "The Project" is consistent with "State, Regional and Local Plans and Programs." This is not accurate in many instances, but, in this discussion it is important to note SANDAG's "2030 RTP" and "2030 Regional Growth Forecast Update's" emphasis on what San Diegans have long lamented: "The (forecast) is not a prescription for the future. It simply portrays the likely outcome if we continue operating under our current plans and policies."

To pursue I-5 widening of this extreme based on the regional growth forecast is the pattern Caltrans has followed for years. This approach led the 2030 RTP to say explicitly what San Diegans have long lamented: "...we can't build our way out of traffic congestion." The DEIR/DEIS ignores this cogent statement and the 2030 RTP conclusion that:

> "...traffic congestion in San Diego will worsen over time unless we take actions to directly address travel demand and have options to get people out of their single occupant vehicles, especially during peak travel periods." (emphasis added)

Further, the studies researched by the Torrey Pines Community Planning Board and conveyed to CalTrans question the effectiveness of freeway expansion such as "The Project."

That board's October 7, 2010 draft comments on the DEIR/DEIS explain these studies' assertions that expanding freeways does not ease congestion, that, in their conclusions, " 'if 'road capacity increases, the number of peak-period trips also increases until congestion again limits further traffic growth'" (from June 4, 2010 report by Todd Litman of the Victoria Transport Policy Institute.)

This additional travel is called "'generated traffic and consists of diverted traffic (trips shifted in time, route and destination), and 'induced vehicle' travel (shifts from other modes, longer trips and new vehicle

trips.)'" Like the "'law of demand'", as the price of goods decreases, the consumption of those goods increases.

DEIR/DEIS Summary, p. S-5 which evaluates "The Project" on consistency with relevant land use policies. The DEIR/DEIS concludes with few minor exceptions that all "Build Alternatives" are either consistent with or that they pose no impacts to these policy documents, in all CEQA and NEPA categories:

> (2) Each "Build Alternative" is inconsistent with the "Mobility Element of the San Diego General Plan (2008).

CalTrans states that they will continue to coordinate with the City of San Diego, among other agencies, to assure compliance with land use and mobility plans. The only issue cited that could be an inconsistency with San Diego is a "Freeway agreement for Voight Dr. concerning a "Direct Access Ramp", this subject "pending." (S-7)

There is no discussion of conflicts with the basic principle of the Progress Guide and General Plan ("General Plan") overall "Mobility Element" which reads as follows:

> "(the overall) "Purpose" is "To improve mobility through development of a balanced, multi-modal transportation network...that gets us where we want to go and minimizes environmental and neighborhood impacts." (ME-3)

This overarching policy, approved after many years of stakeholder and elected official and City staff research, affirmed that not only was a true multi-modal system do-able but also that the City and state transportation agencies must discontinue the repetitious and failed approach that more highway miles for cars simply perpetuated the failed system of our existing freeways. Carmel Valley residents participated actively in this research through appointment to "The City of Villages" process.

Instead of the past automobile-oriented approach, these research teams concluded that, instead, all future transportation projects should be based on the policies that, for one example, lead to the goal that "transit...more efficiently link highly frequented destinations, while still preserving auto mobility." (DEIR/DEIS Chapter 3, section 3.1.12)

> (3) They conflict with key SANDAG Transportation Planning Principles and Adopted "2030 Regional Transportation Plan (RTP).

After "The City of Villages" formula for transportation planning was adopted into the "General Plan", City and SANDAG planners coined the term "Transit First" to emphasize that the region can no longer improve traffic congestion by paving more roads. The City's major goal is to plan for and build "an attractive and convenient transit system that is the first choice of travel for many of the trips made in the City (not just downtown)" and "increased transit ridership." (ME-16) This can only be achieved by collaboration within the region with other transportation agencies, such as SANDAG and CalTrans. To that end, SANDAG adopted as a part of the "2030 Regional Transportation Plan" (RTP) the "Regional Transit Vision":

> "(this) calls for development of a fast, flexible, reliable, and convenient transit system that connects the region's major employment and activity centers with a rich network of transit services, and improves the quality of the travel experience for transit patrons...In addition to the existing and planned light and commuter rail networks the vision incorporates the use of Bus Rapid Transit (BRT) vehicles...(which) have the look and feel of rail vehicles." (ME-16)

The key to success of this "fast, flexible, reliable, and convenient" system is "the successful implementation of capital, operational, and station area improvements" which would "result in a transit system that is so attractive and convenient that transit will be the first choice of travel for many of the trips made in the region (emphasis added) [ME-16]

4) They are inconsistent with the Carmel Valley Community Plan Overall Planning Principle that future communities (such as then "North City West) "should carefully consider locations that can most readily accommodate and support realistic future alternative modes of transit other than the automobile."

Under "PLANNING PRINCIPLES...Transportation Principles, the transportation system should also be used as a tool for shaping the...environment. This can be accomplished by integrating the major system into the natural land forms and by complementing open space systems." (Planning Principles-7)

The four build alternatives would push I-5 farther into the natural open space corridor at Carmel Valley's northern reaches, and, as discussed later under "II They each would change the character of the coastal region and communities...", they would enclose the uplands and wetlands of the San Dieguito River and of Carmel Valley Open Space. This situation is at direct odds of the community plan guiding principle to not have roads erode the "natural land forms." The "Circulation Element" objective, like those of all other elements, emphasizes that the element must "promote preservation of the natural environment." (p. 101)

The community plan "Commercial Element" major objective is to create a "balanced transportation network within the community which would link to the regional transportation network which would require a "transit station site."
Although this site was depicted, the transit station has never been built due to poor City transportation planning. However, the goal here underscores the community plan's vision of an integrated regional multi-modal mass transit system.

The community plan's "Circulation/Transportation Element" is blunt regarding the region's poor performance in transportation planning, even in 1975:

> "San Diego has excelled in the field of transportation planning for personal vehicles. Although it is acknowledged that the automobile will plan an important part in providing transportation needs for (Carmel Valley), the major emphasis of the circulation element is to provide an alternative mode of transportation in order to implement a balanced circulation system." (p. 99)

A circulation system built around the automobile "cannot meet the total transportation needs of (Carmel Valley) since it cannot efficiently serve a significant segment of the population, including the elderly, the young, the poor, or those who choose not to drive..." (p. 99)

Today, the community planning board is beseeched by elderly residents for help with transportation even within the community. These seniors have no resource for mass transit outside the community. Many are forced to leave their homes and live in senior care facilities for no other reason than the transit vans offered.

A failure of the DEIR/DEIS is that it selects passages from land use plans, which only advance the build alternatives. For example, the Carmel Valley Community Plan "Circulation Element" is quoted only from the single principle to develop a "balanced community", achieving social parity by providing equal mobility and access for all residents and from other key principles involving improved bicycle and pedestrian facilities, promotion of carpooling, etc. are seen to be compatible with the plan, and "The proposed project...is compatible with and complements Bus Rapid Transit Service." (3.1-23)

Again, as mentioned above, this project does little to nothing to provide Bus Rapid Transit Service except to lay more asphalt, which, some day, could be converted to BRT service.

The document is silent on the key principles and the community plan warning that:

> "...the consequences of building more circulation systems for the auto":

> are not unfamiliar. Automotive congestion soon reduces, rather than increases, the desired mobility and causes air and noise pollution; business and government must make large investments in circulation and parking facilities..." (emphasis added)

Today, 35 years later, this "large investment" by business and government to design and build a comprehensive, mixed modal regional circulation system with efficient and comfortable modes of travel has not happened and this "Project" reverts to transportation planning that was considered obsolete even by 1975.

Finally, the community plan "Public Transportation System" was envisioned to be a "Regional Express and Sub-regional system...proposed to operate on freeways and/or major streets." At least two lanes for "exclusive transit use" should be reserved at first by buses "but could be converted for use by fixed guideway systems as the need arises." Even in 1975 the "trolleys on wheels" on their own lanes were anticipated, such vehicles that are described in the "General Plan" as one of the most efficient ways to reduce roadway congestion. This "Project" ignores these innovations.

Given these principles and their clear message that transportation planning both within Carmel Valley and in the regional transportation system surrounding it, the following DEIR/DEIS comments are supportable:

> "(regarding) the **Carmel Valley Community Plan**...The proposed project is located near Neighborhoods 2 and 3 (and neither of these precise plans...contains policies relevant to the proposed project." (3.1-20)

An ancillary issue for Carmel Valley concerns the specific project of a "Pedestrian Bridge" spanning I-5 from Lozana Road (actually the parking lot of Del Mar Hills Elementary School) in the Torrey Pines community to Lower Ridge Rd. in Carmel Valley. (pp. 2-36) This bridge would "provide the opportunity for a dramatic gateway marking the northern entry to San Diego."

It also is seen as an "enhancement" for the Torrey Pines and Carmel Valley communities as it would "allow a safe route to school for students living on opposite sides of the freeway" and it would connect the two communities as if they are now isolated from each other. The students are in two different school district, therefore the bridge would be of no benefit for travelling to school. The DEIR/DEIS ascertains that the communities surrounding Del Mar Heights Road would benefit from this bridge as if this "community enhancement" would make the I-5 widening pill go down more easily. This is not the case: there is no "benefit" because these communities do not rely on I-5 in order to access each other.

While three of the "community enhancement" projects proposed will increase trail access and provide a connection from the CVREP trail to the beach along Sorrento Valley Road, the fourth "enhancement"---a multi-million dollar bridge to nowhere---sounds like a foolish boondoggle not needed by the community.

The DEIR/DEIS does not depict the rationale for this bridge; rather, CalTrans technical studies, not included in the DEIR/DEIS, are the source for the bridge. In January 2008 one such study listed it as "Project #3: Pedestrian Overpass Connection North of Del Mar Heights Road." The bridge would "improve the visual linkage between the communities..." and would be an improvement to the "existing conditions at Del Mar Heights Road" (which) are congested and unpleasant."

The Carmel Valley Community Planning Board vaguely recalls mention of this "amenity" possibly in 2008 but it has never voted on it and if any, only sketchy details were part of the presentation. Were it to vote on it today, the board would be very concerned about the San Diego Police Department's safety consultant who, in an August 9, 2010 letter to the Torrey Pines Community Planning Board chair, Dennis Ridz, warned about the overall safety of such a bridge:

> "Pedestrian bridges and their approaches are potential entrapment spots. A person on the bridge has nowhere to run if threatened by another person(s) or its approaches. And a person on the

bridge cannot be seen or heard by anyone else if threatened...freeway noise level will block out anyone calling or whistling for help."

Ways to improve the safety of a pedestrian bridge are suggested but none are possible in this location where a narrow path in Carmel Valley is the only place people crossing the bridge can be seen. Further, the SDPD advises, fencing should be used to limit the bridge to daytime use. Emergency calls from cell phones might not be heard "over the freeway noise."

Thus, the DEIR/DEIS has completely failed to evaluate the safety aspects of this proposed bridge and the final document must justify this bridge, given the valid and frightening concerns of law enforcement.

II. Each build alternative would each change the character of the coastal region and communities by requiring high retaining walls, noise abatement walls and, as the DEIR/DEIS points out, the widened freeway would be experienced as double the current size. The DEIR/DEIS accurately states that this project would change the corridor from a suburban to an urban setting. There are significant and unmitigable environmental consequences, which are judged inconsequential in the document.

(1) The DEIR/DEIS accurately summarizes the changes "The Project" would bring to the I-5 coastal corridor: It would change from a suburban, low intensity corridor to an urban one (Table S-1). This finding also points to the internal inconsistency of this document. Table S-1 summarizes major potential impacts by alternative, concluding that the build alternatives would only result in "Minor inconsistencies with city and community plans" while also stating that the "visual character of the corridor would become substantially more urban." (emphasis added) and that "Visual quality would be lowered substantially" while the floodplain also would suffer "minor encroachment."

As the photos and photo simulations on pages 3.7-4, 3.7-5,3.7-18 and 3.7-19 graphically inform, the vastly-increased amount of asphalt, retaining walls and losses of open views of the coastal area cannot be considered "minor inconsistencies" with State, Federal, Regional, City, and community plans in this area. The final EIR/EIS should be more forthcoming about this major change in character to the coastal corridor.

This project would change the sloping, vegetated coastal hills to sterile, vertical walls traversing the entire corridor.

(2) The DEIR/DEIS accurately portrays the aesthetic and visual values of the existing coastal corridor, especially in the Carmel Valley, Del Mar Heights, Del Torrey Pines area, and the western San Dieguito River Valley, but then it minimizes the impacts on this resource, concluding, for example, that "Implementation would result in minor acquisitions of land and open water (of the San Dieguito River Park)...However, those acquisitions would not affect the function of the park." (3.1-25.)

This argument ignores the science of upland/wetland habitats. Most environmental researchers have learned that even small encroachments into already encroached-upon habitats can alter the ecosystem. Economies of scale are put into play: there has to be sufficient amount of specific habitat communities in order for the interaction and interdependence essential to species' survival to occur. The DEIR/DEIS accurately cites the California Coastal Act Section 30233, which discusses "Limited Allowance for Wetland Fill." This fill can happen "only when there is no feasible less environmentally damaging alternative." The DEIR/DEIS has not met this condition. The only build alternatives considered to reduce congestion are those, which widen the freeway to the large extent, forcing fill in the wetlands.

The DEIR/DEIS argument that "the visual character of the park would be unchanged" and that "The additional lanes...(of) the I-5 NCC project would not substantially alter views" is not supported by the descriptions in the document of the retaining walls and widened roadway and bridge across the river

valley and the San Dieguito Lagoon. (3.1-33) Instead of the softly shaped vegetated slopes, vertical masonry cliffs would be the predominant feature of this landscape.

The DEIR/DEIS argues similarly for all sections along the coastal corridor near Carmel Valley, saying, essentially, 'yes, "The Project" would completely change the open character of the area but this impact would not affect the function of the resource.' And all land use plans and policies, which argue fiercely for preservation and enhancement of the coastal resources, are seen to be met by "The Project."

> "San Diego is the largest City adjacent to ("The Project")"...the portion of the City...that may be affected by the proposed project includes the area east of Del Mar..." (3.1.2 and p. 3.1-20)

Further, this part of the coastal corridor is described in deservedly positive terms. While I-5 now links "two of the largest metropolitan regions in the country":

> "...the character of the corridor has managed to survive. Expansive views of river valleys, coastal lagoons, beaches and other natural scenic resources offer a freeway driving experience like no other in southern California. Development densities near these natural features have remained low for the most part, and large groupings of mature trees are the primary visual element...
>
> Large structures normally found on urban freeways such as retaining walls and noise walls are, in a large part, absent from much of the corridor...natural landscape features remain in the forefront, opening scenic views from the road and screening views of the freeway from adjacent communities...
>
> The I-5 corridor leads the traveler through a sequence of outdoor spaces that alternates between coast valleys and their corresponding uplands..." (p. 3.7-1)

This accurate portrayal serves to emphasize how "The Project" conflicts with the stated purpose of "The Project", to "improve travel times" as well as to "Protect and enhance the human and natural environment along the I-5 corridor." (emphasis added) (S.2) It also conflicts with CalTrans and Federal Highway Administration (FHWA) environmental policies summarized in the DEIR/DEIS (1-11). These policies

> "recognize the need to protect and enhance the equality of life in accordance with the environmental, economic, and social goals of the State. Both agencies are mindful of the sensitivity of the coastal resources and the ongoing lagoon restoration efforts..."

However, "Both agencies would seek to not impede these efforts and would identify opportunities to minimize potential impacts to the maximum extend practicable."

The coastal corridor including Carmel Valley and the San Dieguito River Valley and Lagoon undergoing the massive Southern California Edison mitigation restoration is one of the State's last remaining wetlands, 92% of the former wetlands having been destroyed by development and pollution. The DEIR/DEIS statement that CalTrans would "seek not to impede these efforts" and the fact that doubling I-5, taking land from the wetlands, and building imposing retaining walls offers little comfort to our communities and river park supporters. The DEIR/DEIS fails to meet CEQA and NEPA requirements that all information about a proposal must be made available to the public. The vague allusion to "identify(ing) opportunities to minimize potential impacts" is unacceptable.

Key view #2---I-5 at Del Mar Heights Road (p. 3.7-18) is a clear example of "before" and "after" of this project, a photo simulation of the experience of driving north on I-5 at Del Mar Heights Road, and a similar experience is shown for travelers approaching the river valley north of Del Mar Heights Rd. The wholesale change from soft, vegetated slopes running continuously on both west and east of I-5 to vertical block walls would "produce a marked increase in the small-scale suburban character of the community. They would produce a marked increase in visual contrast between the freeway and its surroundings. **The change to visual character would be high.**" (emphasis added)

In this reference as with many in the DEIR/DEIS it is as if one author of the DEIR/DEIS has analyzed the potential impacts of "The Project" (as in the case above) and another author was tasked with determining if the impacts were significant. The first author is the one with credibility and consistency. The second one is whitewashing "The Project."

(3) Evaluation of the noise impacts to Carmel Valley is inaccurate and misleading. While only a small part of Carmel Valley is impacted by freeway noise, that noise can be pervasive in these areas and might be impossible to mitigate. The issue in Neighborhood 3, adjacent to I-5 and north of Del Mar Heights Road, is that the neighborhood slopes down to the south to meet the freeway, which slopes down to the north. This leads to two issues:

a. Most of the neighborhood is above the freeway, making it impossible to block the noise with traditional sound walls. Sound walls are designed to reduce noise impacts to areas at the same level or below the noisy environment. Since the homes here look down at the noisy freeway, the sound walls cannot block the rising noise unless they were constructed exceptionally high, or covering the freeway itself, making the freeway section a tunnel.

b. Much of the noise that enters the neighborhood does so from the Del Mar Heights Road interchange where the freeway is higher and the neighborhood lower. In this case, the community almost acts as a bowl or horn, gathering the sound from the interchange and distributing it to the north and east, through the populous neighborhood. At times the freeway noise in the interior of the neighborhood (for instance, on the north side of Solana Highlands Elementary School and Park) can be louder than in the back yards of some houses directly along the freeway!

Given the geography, noise impacts on Carmel Valley Neighborhood 3 could be substantial and will be unmitigable. This seems to be the determination of the sound engineer who repeatedly states in the "Noise Study Report" that, "It is not feasible to abate highway traffic noise for Receptor "n" due to..." The limited number of days and times (apparently a single day and over a 20-minute period) and the out-of-date traffic information (2004) greatly reduce the usefulness of the noise measurements.

The sound study executive summary says:

> "The difference between the predicted No-Build and Build traffic noise levels would be three decibels or less for the vast majority of noise sensitive receptors, with one receptor being exposed to noise level increases as high as 12 db...In other words, sound energy must be doubled to produce a 3-db increase..."

So, the sound energy will double (on average) the entire length of the project.

Three decibels is not necessarily a small volume change, for instance, reading the scale in the Noise Study Report, it appears that 3-5db might be the difference between a "quiet suburban nighttime " and a "quiet urban nighttime." While the human ear can barely perceive a 3 db change, but readily hear a 5 db change, the difference between a suburban and an urban nighttime would be apparent to all. The final EIR/EIS should provide some real-world examples of 3 db sound differences and should explain why double the sound energy coming from the freeway widening should not worry this community.

(4) The study of impacts of roadway "improvements" on community character is required by CEQA. Therefore, the DEIR/DEIS states, "...it is appropriate to consider changes to community character and cohesion in assessing the significance of the

project's effects." The document attempts to address this issue but does not succeed because it minimizes the changes it admits would occur.

For example, it concludes that the stable, established community of Carmel Valley, with a "high proportion of owner-occupied homes" and a propensity of "long-standing residents" would experience "a change from suburban to urban" in visual and aesthetic values, but that the build alternatives "would not result in any substantial land use impacts..." Conversely, the text and photo simulations (3.7-18 and others in Chapter 3) clearly portray the change in community character due to the retaining walls, noise walls, and a freeway widened to 14-16 lanes:

"Change to Visual Quality/Character

The proposed walls would decrease the intactness and unity of the viewshed from moderate to low levels. Views of the preserved upper slopes and adjacent community would be obscured because the tops of the near-vertical retaining walls would block the line of sight for many freeway viewers. Vividness would also be reduced as the attention of the viewer is directed more toward foreground views of the widened freeway. Large forms would be built in both the horizontal and vertical planes and would be incompatible with the small-scale suburban character of the community...The change to visual character would be high." (emphasis added) [p.3.7-18]

The Build alternatives would result in a certain amount of visual blight to property owners along the edge of the northern and western bluffs of Neighborhood 3. This includes the 80 or so properties starting at the Del Mar Heights Road interchange, northward to the around "Overlook Park" (designated community open space) continuing to the northeast of the park; and numerous properties along El Camino Real (outside of Neighborhood 3.) In addition, the view from the park itself, a major amenity of Carmel Valley which neighbors fought hard to secure) will be reduced by this project, not to mention the increased freeway noise at this location.)

While the noise impact within the San Dieguito River Park might be minimal, the visual impact could be significant. The "Environmental Consequences (3.1.1.1) paragraph for the park claims that the "visual character of the park would be unchanged" as the park is already bisected by the freeway, adding that only 1.14 acre of land would be "used" by "The Project." Given the potential to add two lanes on each side of the freeway over the one-mile stretch through the river park (about 6 acres), the proposal must include steep retaining walls to minimize the intrusion into the river park. The report should better detail how 6 acres of freeway lanes will be fit into 1.14 acres of land, and if the solution involves retaining walls, how these tall concrete walls will leave the visual character of the park unchanged. The declaration in section 3.1.3.4 that "The proposed project would not result in any adverse impacts, since the function of the recreational facilities remain" must assume a very narrow definition of the phrase "adverse impacts", given the potential size of the walls or slopes along the freeway.

III. "The Project could likely return the corridor to failed levels of service (LOS) from 5-10 years after completion.

As noted in section I of this comment letter, the Torrey Pines Community Planning Board uncovered considerable research on source studies, which are located on www.vtpi.org/gentraf.pdf. The studies cited all show that increased freeway capacity soon is reduced to its pre-improvement conditions because of "generated traffic" and "induced travel", phenomena known to many professional planners.

As the onset of freeway improvements congestion is alleviated and this reduces the cost and time of being on the freeway so a "latent travel demand" occurs. In other words, the expanded freeway itself generates traffic, so that in a short number of years (5-10 most transportation scholars say), the same roadway has attracted more drivers and those previously using other modes of transportation or who, previously, did not drive at peak hours.

Researcher, "Cervero", focused on California traffic patterns and "estimated that about '80% of additional roadway capacity is filled with additional peak-period travel, about half of which (39%) can be considered the direct result of the added capacity.'" Hansen, in 1995 concluded his research saying, "'it appears that adding road capacity does little to decrease congestion because of the substantial induced traffic.'"

Finally, Noland and Mohammed A. Quddus published in 2006 that "'increases in road space or traffic signal control systems that smooth traffic flow tend to induce additional vehicle traffic which quickly **diminish any initial emission reduction benefits.**'"

We agree with the TPCPB that until such studies which question the efficacy of depending upon auto-oriented improvements, especially of this large a scale, are thoroughly reviewed and compared to the CalTrans proposal, there are serious omissions and errors in the DEIR/DEIS. The opportunity to create a mixed auto and mass transit system in this corridor will only occur if the transportation agencies employ only the most innovative and sensible congestion management techniques.

IV. Given the impacts to the coastal environment, to visual and aesthetic values, to communities, to noise and air qualities and given the questionable success of reducing congestion with these alternatives, Caltrans and other transportation planners should begin anew with alternatives which would not totally alter the coastal corridor.

Such alternatives should:

1) Incorporate the multi-modal principles of SANDAG, the City of San Diego, and numerous community plans by investing in a regional-serving and efficient mass transit system as part of this "Project" not in some future time;

2) Include all-transit or multi-modal proposals and analyze them on the same scale as the all passenger car alternatives presented. For instance, if we're going to consider a $4 billion proposal to make more lanes for cars then we should also consider one or more $4 billion transit-based proposals. For example, CalTrans should develop an alternative of two bus-only lanes in the center median, where the lanes had private on- and off ramps from the interchanges.

Some, not 8 or 10, additional lanes dedicated to mass transit could be included. Caltrans should analyze how much of this multi-modal system could be realized if the $3.3 to $4.3 billion cost of these build alternatives were spent on mass transit. Caltrans also should thoroughly compare the congestion management capability of this alternative to the four build alternatives.

3) Reduce the width and number of lanes from the 14-lane build options herein;

4) Provide local, community-serving and frequent public conveyances that would connect homes, businesses, commercial/office use; and recreation/entertainment with these core communities. One such community-serving system could circumnavigate Carmel Valley, Torrey Pines (Del Mar Heights), Del Mar, Solana Beach, Via de la Valle to El Camino Real southbound, to Carmel Valley again. Small busses or vans would offer residents and workers efficient and car-less trips to restaurants, the beach, shopping, libraries, etc.

CONCLUSION

The "Build Alternatives" each would change the character of the I-5 coastal corridor throughout its 27-mile length. The DEIR/DEIS fails to assess its impacts. "The I-5 North Coast Corridor Project" focuses on the automobile while suggesting that this project will lead to a mass transit system, thus it is in conflict with all relevant transportation policies and land use plans in the region.

Given obvious attempts to minimize impacts, CalTrans further hurts communities by failing to make this project a true multi-modal one. There are many models for an efficient multi-modal system but CalTrans does not embrace them. Thus, the impacts of this proposal are depicted as minimal.

CalTrans must re-think its role in shaping the environment and must understand that we can't keep whittling away at our natural resources.

Thank you for your serious consideration of these concerns, echoed by many communities in the I-5 coastal corridor.

Sincerely,
Carmel Valley Community Planning Board

Frisco White, AIA, Chair

cc: Councilwoman Sherri Lightner, District 1
Bernard Turgeon, Senior Planner, City of San Diego
Supervisor Pam Slater-Price, District 3, County of San Diego
State Senator Christine Kehoe
Richard Earnest, Chair, San Dieguito River Park Joint Powers Authority
Dennis Ridz, Chair, Torrey Pines Community Planning Board