

California Transportation Commission
 cc. Santa Cruz County Regional Transportation Commission
 Air Resources Board
 RE: Item 51 on Jan 30-31 meeting

January 26, 2019

Dear Commissioners,

On your January agenda is a resolution to approve an HOV lane project on State Route 1 in Santa Cruz County to allow for consideration of funding.

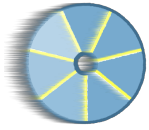
Please deny this approval. This project is inconsistent with state policy to reduce greenhouse gas emissions by reducing vehicle miles traveled.¹ Highway expansion for HOV lanes is recognized by the Governor's Office of Planning and Research as the type of project "that would likely lead to a measurable and substantial increase in vehicle travel."² In contrast to the induced travel effects of highway expansion for HOV lanes, the OPR report recognizes "converting existing general purpose lanes to HOV or HOT lanes" as having a positive impact on reducing VMT.

The following are reasons the CTC should deny the approval of this project:

1. **Outdated concept** The project was conceived two decades ago, at a time when some transportation agencies were still acknowledging the futility of highway expansion as a strategy to reduce congestion. This project was proposed before Al Gore produced *An Inconvenient Truth*, and before California adopted AB 32 to reduce ghg's.
2. **Significant increase in VMT** The Final EIR for the HOV lane project estimates a 29% increase in vehicle miles traveled by 2035, compared to the No Build Scenario.
3. **Underestimate of VMT** Everyone over a certain age understands that newly-widened highways become congested again. In Los Angeles, a [study reports](#) that travel speeds are just as bad or worse after widening Hwy 405 for a carpool lane. In the Bay Area, the [number of "extremely" congested carpool lanes has](#)

¹ SB 375; SB 743

² [Technical Advisory on Evaluating Transportation Projects in CEQA](#) "Project types that would lead to a measurable and substantial increase in vehicle miles traveled generally include...addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes..."



[risen](#) more than 250 percent between 2013 and 2016.

The projected 29% increase in VMT from this project is almost certainly an underestimate due to the fact that the EIR did not follow the practice for estimating induced travel required by CEQA regulations adopted in December, 2018.

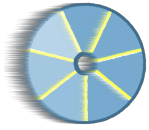
4. **No Analysis of Alternatives** Contrary to the mandate of the California Environmental Quality Act, the EIR does not examine alternatives to the highway expansion project. The only alternatives that are analyzed in the EIR are two versions of highway expansion and a No Build Alternative. Notably absent from the EIR are three alternative strategies for travel parallel to Highway 1 that are analyzed by the Santa Cruz Regional Transportation Commission's recently published Unified Corridors Investment Study:

- Bus-On-Shoulder (a bus-only lane the shoulder of Highway 1)
- Transit on the rail corridor between Watsonville and Santa Cruz
- Enhanced bus service on Soquel and Freedom Blvd.

5. **Flawed GHG Analysis** The EIR claims that the preferred alternative, which would double the existing width of the highway to accommodate an HOV lane and an auxiliary lane in each direction, will result in a reduction of greenhouse gas emissions relative to the No Build Alternative. If this absurd claim is not challenged, Caltrans will continue to use it to justify HOV lane expansions in other areas of the state. "Want to reduce greenhouse gases? Widen your highway."

The EIR's rationale is that vehicles traveling faster during the peak period will consume fuel more efficiently. This rationale depends on the assumption that the congestion relief provided by the highway expansion will last beyond the short-term. [Research](#) commissioned by the California Air Resources Board reports: "Numerous studies ...consistently show that adding capacity to roadways fails to alleviate congestion for long because it actually increases vehicle miles traveled (VMT)."

6. **Financially infeasible** The HOV lane project is listed as unfunded in the 2040 Santa Cruz Regional Transportation Plan. And recently the staff of the Santa Cruz RTC told the Commission that the HOV lane project cannot be funded "before 2035". So the CTC is being asked to approve a project for which there is no prospect of funding in the foreseeable future.



- Ineligible piecemeal projects** Local funding is available for a small piece of the HOV lane project: four miles of auxiliary lanes. There will be negligible congestion relief from the auxiliary lane project, according to the EIR. Nor will accident rates decline with auxiliary lanes, again according to the EIR. With no safety benefit, this auxiliary lane project is ineligible for funding by the Solutions to Congested Corridors Program.
The guidelines for that program state, “Highway lane capacity increasing projects funded by this program shall be limited to high occupancy vehicle lanes, managed lanes, and **other non-general purpose lanes designed to improve safety** for all modes of travel.”

Please help align our state’s transportation spending with its climate and social equity goals by denying approval for this project.

Thank you,