



The Campaign for Sensible Transportation

P.O. Box 7927, Santa Cruz, CA 95061 831-429-6149 www.SensibleTransportation.org

January 25, 2016

Mr. Matt Fowler, Senior Environmental Planner
Caltrans
50 Higuera St., San Luis Obispo, CA 93401
by email attachment to Matt.c.fowler@dot.ca.gov

Re: Comments on the Santa Cruz Route 1 Draft EIR

Dear Mr. Fowler:

Thank you kindly for the opportunity to comment on the Draft EIR. The Campaign for Sensible Transportation (CFST) has these comments.

We agree with the Santa Cruz County Regional Transportation Commission and others: peak period vehicle congestion on Highway 1, in Santa Cruz County's nine mile section included in this project, is a problem. We understand this as the primary motivation for the proposed project. However, for reasons we'll explain, we question whether the two project alternatives considered in this Draft EIR are adequate alternatives for the best way(s) to address the problem.

We observe there are other societal purposes, such as not contributing to destabilization of the climate, and providing more genuine alternatives to driving, which are due to be included in the development of project alternatives. These added essential concerns are supported more than ever before by State of California laws as well as local government plans, and by attention to the current findings of climate science.

This Highway 1 project design follows from the view that if there is traffic congestion on Highway 1, it's because there is not yet enough capacity for more vehicles to get through. This approach does not consider whether more vehicle congestion follows predictably as an outcome of overdependence on a single travel mode: automobiles as the way to move large numbers of people, especially commuters to work, in the same direction at the same time, on the same route.

The Purpose and Need described on pages 1-9 and 1-10 of the main Draft EIR document also includes "promote the use of alternative transportation modes" and "encourage carpooling and ridesharing." But the only alternative examined (TSM) that has some prospect of being funded and built during the life of the EIR is chiefly aimed at vehicle throughput on Highway 1.

The TSM (Transportation Systems Management) Alternative would have a negligible effect in reducing congestion by year 2035:

-- Building the TSM Alternative “would result in a very slight improvement in traffic congestion when compared to the No Build Alternative.”¹ (We observe, that outcome is actually overoptimistic, since the traffic analysis did not consider induced travel.)

-- The EIR predicts “severe breakdown of [traffic conditions on] State Route 1 by year 2035” following completion of the auxiliary lanes project.² This is due to an increase in car traffic.

-- “The Tier I Corridor TSM Alternative would not achieve sufficient congestion relief to attract any substantial number of vehicles that had diverted to the local street system back to the freeway. Local access to, and circulation around, community facilities near these intersections would not improve relative to no-build conditions.”³

-- “Compared to no-build conditions, traffic operations at study intersections with Tier I Corridor TSM Alternative improvements would worsen marginally.”⁴

The project’s promotion of auto-centered travel outweighs its promotion of alternative transportation modes:

The justification for stating the TSM Alternative promotes alternative transportation modes is that the project includes construction of three new pedestrian/ bicycle overcrossings over Highway 1, and improvements to pedestrian and bicycle facilities on several existing overcrossings. However, the main expenditure in the TSM Alternative is for auxiliary lanes on Highway 1, and reconstruction of overcrossings and onramps. For the amount of funding proposed to construct the auxiliary lanes, a far greater promotion of alternative transportation could be achieved.

Besides the TSM Alternative, the only other Build Alternative offered (HOV) is no longer considered financially feasible during the life of the EIR:

“The cost of completing the entire HOV lanes project on Highway 1 (approximately \$600 million) is beyond the amount of discretionary funding that can be used for highway projects in our county through 2035. Additional Highway 1 Corridor projects, including several new interchanges, that would need to be designed and constructed in advance of HOV lanes are identified in the unconstrained project list as needs that are not currently financially feasible with revenues projected through 2035.”⁵

This uncontested reality is a further argument for full consideration of environmentally superior project alternatives of greater sustainability, performance, community quality of life, and financial feasibility. We’ll name some of those alternatives later in this letter.

¹ Draft EIR, page 2.1.5-16

² page 2.1.5-14

³ page 2.1.5-17

⁴ page 2.1.5-17

⁵ 2014 Santa Cruz County Regional Transportation Plan, page 6-4

The Campaign for Sensible Transportation shares the following common concerns and questions about the Draft EIR with the Santa Cruz County Group of the Sierra Club. The Sierra Club's comments letter submitted separately to Caltrans states equally, the following comments of this letter.

The Highway 1 Draft EIR is out of date:

The Draft EIR is using out of date information in many respects, including in the model and data for the basic traffic analysis. With some of the report work prepared beginning in the early 2000s, it is no longer current and is in need of reworking.

We see a need for editors and experts to go through the documents and check: is this current information for current policies, and is the DEIR now internally consistent?

For a single example among many, on page 1 of the Technical Memorandum on Energy Impacts, May 2011, the report states the Calif. Air Resources Board has not yet set certain greenhouse gas (GHG) reduction targets for our region. But, the ARB set those targets initially in 2010, and has issued increased targets since then.

An edit for corrections, updates, and readability is needed.

Combined with the out of date information, some of the Draft EIR has not been text edited to incorporate extensive errata and editing that is already identified as needed. Some of the reports begin with over twenty pages of errata at the front before the table of contents may be found, such as the Air Quality Study Report.

The Air Quality report begins, for example, with a first errata item that is an attempt to compensate for an out of date report, but the correction is itself nearly incomprehensible, as follows: "The use of Existing as it refers to 2003 conditions is revised to Baseline. This above-described usage of the term "Baseline" supersedes any other usage of the term "Baseline" or "baseline" in the report." Should members of the public or agencies be expected to understand this and then themselves make the related edits throughout, as they read the report?

The traffic model is not current.

It appears the current-conditions traffic data presented is from 2001-2003, which is out of date. Similarly, the Association of Monterey Bay Area Governments (AMBAG) 2005 Regional Travel Demand Model that was used for traffic modeling is out of date and relied on an even older forecast of population, employment and travel, one that was far higher than the current AMBAG forecast. The report refers to a future Design Year 2015, but 2015 is now in the past.

The project’s “Purpose and Need” (pages 1-9, 1-10), and the two highway widening versions identified in response, are *conceptually out of date*, considering...

(1) a present-day understanding of the most foreseeable long term outcomes of freeway widenings on existing congested California freeways, and

(2) it is now “unequivocal that anthropogenic increases in the well-mixed greenhouse gases have substantially increased the greenhouse effect, and the resulting [climate] forcing continues to increase.”⁶ The science-based conclusions of climate research are clear that the present trajectory of cumulative greenhouse gas emissions is heading California and the world toward catastrophic climate changes that could make problems like traffic congestion pale in comparison. The State of California requirements to greatly reduce greenhouse gas emissions, and our science-based societal need to do so, must inform the project direction at the outset, for instance as to identifying sustainable project alternatives that do not lead to increased dependence on automobiles.

The Purpose and Need do not reflect current California state law and Governor’s executive orders requiring reductions in greenhouse gas emissions and reductions in vehicle miles traveled.

The speculative reasoning in the DEIR that motor vehicles “may” more often travel at fuel-efficient travel speeds and thereby may reduce GHG emissions if/when congestion is reduced, is contradicted by the report’s own findings that with either project build option, vehicle congestion will continue and vehicle miles traveled will grow substantially. If it is also correctly acknowledged that freeway expansions induce new travel by temporarily reducing the time cost and increasing the convenience of private vehicle travel, then the project outcome as to greenhouse emissions must be even worse.

The Highway 1 expansion project that this EIR analyzes was conceived in the late 1990s, at a time when a different set of understandings may have existed for three key questions:

1) How to respond to chronic, statewide problems of vehicle traffic congestion that occurs on California freeways like Highway 1 in mid-Santa Cruz County? Today it is increasingly recognized in transportation research that “Adding capacity to roadways fails to alleviate congestion for long.”⁷

Thankfully, Caltrans practice is showing evidence of change in overall planning direction away from freeway capacity expansion, as evident in Caltrans’ draft California Transportation Plan 2040, which states on page 59, “Reduced funding and the need to reduce GHG emissions make the case that adding automobile capacity is not the answer.”

⁶ Intergovernmental Panel on Climate Change, Fifth Assessment Report, at Working Group I, “Climate Change 2013, The Physical Science Basis,” page 661. Available on web at www.ipcc.ch

⁷ Susan Handy PhD, “Increasing Highway Capacity Unlikely to Relieve Traffic Congestion,” 2015, UC Davis Institute of Transportation Studies.

2) What are the interactions between freeway expansion and related travel patterns, land use patterns, population shifts, and economic activity? Today, land use plans increasingly aim to reduce, not support, sprawl and vehicle miles traveled.

Major investments in freeway expansion projects are not just costly; they run counter to land use plans for transit-oriented, compact development and sustainable communities.

3) What role, going forward, should transportation projects or programs have in greatly reducing greenhouse gas emissions as now called for by state law? The proposed Highway 1 widening project, in either alternative, would increase automobile dependency, vehicle miles traveled, and greenhouse gas emissions.

This set of concerns went poorly recognized by local Santa Cruz County transportation commissioners when the project was conceived in the late 1990s. Those commissioners at the time overruled the concluding recommendation of their consultant team in the 1998 Major Transportation Investment Study. The MTIS Final Report, December 1998, recommended a focus of transportation investment on the parallel rail corridor in Santa Cruz County and not on Highway 1.

The DEIR does not quantify and present in clear fashion, existing and future vehicle miles traveled and greenhouse gas emissions.

This is a significant gap in information for the public and decision makers. It appears these estimates were compiled in data tables in obscure, unnumbered pages at the back of the Air Quality Study Report, though with evident errors as to the units of measure and other labeling. The main DEIR document then only states VMT and GHG emissions would “increase” and gives annual GHG figures that are implausible on units of measure.

The DEIR does not provide an analysis of the potential cumulatively considerable effect of greenhouse gas emissions from the project.

On page 3-12, the DEIR excuses itself from this crucial analysis as too difficult, even though at least one court has ruled that the impact of greenhouse gas emissions is “precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct.” (We observe the DEIR is a NEPA, National Environmental Policy Act, as well as CEQA document.)

The DEIR must consider environmentally superior alternatives:

This Highway 1 project concept *began* with an evident assumption or conclusion that the only viable way to respond to freeway congestion is by adding lanes or other increased throughput to the freeway. The DEIR thus only analyzes two flavors of widening Highway 1, and compares that *only* to doing nothing. But, hundreds of millions of dollars can accomplish something for transportation besides widen a freeway.

There is great need now for dedicated effort to examine more sustainable, potentially less costly and more effective alternative projects and programs to address freeway traffic congestion, such as:

- Bus-on-shoulder for Metro buses on Highway 1. State law was amended in 2013 explicitly to allow this potential use by Metro, and Metro is seeking to study it.
- Transportation Demand Management to include deep support for employer/employee incentives to reduce peak period drive-alone commuting. Local pilot projects for TDM have shown successes but lack funding and recognition.
- Transit on the now publicly owned rail corridor.
- New safer routes for bicycles and pedestrians, including rail-trail, to reduce short-trip driving.
- Bus Rapid Transit.
- Location Efficient Mortgages or any other innovative means of encouraging less single occupant vehicle, distance highway commuting due to housing costs.
- Programs that can in any way ameliorate traffic merit consideration under CEQA's guidance, whether or not they lie within the expertise or conventional purview of Caltrans and the Santa Cruz County Regional Transportation Commission.

The DEIR does not provide an analysis of what the outcome might be of building the “next” three auxiliary lanes projects on Highway 1.

This is a specific project package that the SCCRTC is considering for inclusion in a Santa Cruz County 30 year half cent sales tax ballot measure. While proponents of this three-auxiliary-lanes scenario promote it as providing congestion relief, this limited program of auxiliary lanes construction is not analyzed as a package in the DEIR for Highway 1.

What would result, especially over time? The DEIR reports on a more comprehensive “Transportation Systems Management” (TSM) Alternative that would include two further auxiliary lanes projects (total, five) and ramp metering; this is not the same program, and people are confused by this.

The DEIR does not acknowledge the role of induced travel in affecting the outcome of adding lanes or capacity on existing congested freeways. Page 2.1.5-23 about this does not provide full citation information for the referenced studies, and the DEIR does not make those studies accessible to the public. The associated claim that recent research indicates induced travel is a minor effect, is just not true and is out of date. The research work “Handy 2003” cited to support that, should be updated to Susan Handy and Marlon Boarnet’s more current published research finding that “Given the induced travel effect, capacity expansion has limited potential as a strategy for reducing congestion.”⁸

⁸ Susan Handy and Marlon Boarnet, “Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions,” Sept. 2014, California Air Resources Board.

The outdated traffic model used for the DEIR does not account for induced travel, according to the AMBAG staff who managed it, and there is no indication that any model post-processing steps were taken to otherwise account for induced travel.

The DEIR's failure to take induced travel into account distorts the data results and leads to overly favorable conclusions regarding congestion reduction and travel time reduction from adding highway lanes, throughout the DEIR. This is no small mistake.

What would be the effect of chronic construction delay conditions if many sequential, Tier II projects were built on Highway 1? This question is not addressed in the DEIR, yet it could be a significant traffic congestion outcome for many years of construction. The recently constructed Soquel-Morrissey Auxiliary Lanes project resulted in ongoing traffic delays during construction, including when actual lanes were not closed.

The proposed Tier I HOV and TSM alternatives would damage the Valencia Lagoon habitat of the listed endangered Santa Cruz Long-toed Salamander:

The report defers answers to this concern to a later point in time, including even possibly to be resolved during construction, even though the preliminary plans do show retaining wall and fill encroachment into known existing essential habitat. The question of further impaired runoff water quality to the habitat is also not addressed.

A full Biotic Assessment is needed up front, and a USFWS approved Habitat Conservation Plan may be appropriate, before this design concept that impacts this endangered species in one of its few places of existence moves forward, including to show how any conjectures about creating replacement habitat and moving salamanders, etc., would actually be funded and accomplished.

Visual changes resulting from either project alternative are acknowledged in the DEIR to have an adverse visual quality impact.

However, we take issue with the claim that after removal of many mature and skyline trees, the remaining trees would be "providing visual interest similar to the existing landscape," and that "architectural treatments would... maintain a moderate to moderately high degree of visual quality along the Route 1 corridor."

The very extensive new hardscapes (pavement, retaining walls, sound walls, hardened slopes, etc.) would degrade the visual quality of the route, not only for residents but for tourists who presently comprise an important Santa Cruz County economic activity. Also, the visual representations should be updated to show the before and after, actual visual outcomes of the Soquel-Morrissey Auxiliary Lanes and the Highway 1/17 Merge Lanes projects, with cumulative effect considered.

For these proposed projects that could result in some hundreds of thousands of added vehicle miles traveled on Highway 1 per day (yet to be disclosed), the Campaign for Sensible Transportation also has concerns about either project option inevitably leading to increased traffic noise, increased human exposure to toxic diesel and exhaust gases and

particulate matter, potential blighting of close-by neighborhoods impacted by these effects with or without soundwalls, and increased contamination of watersheds from polluted highway runoff.

Of added concern, other worthy human beings, species, and environments in other places are incrementally impacted by the intensive resource extraction required to maintain automobile-reliant transportation systems, which depend on inefficient energy consumption and high materials and wastes throughput.

Public health and environmental justice have become better recognized as issues to address in transportation planning. Obesity, asthma, stress, and other health conditions are increased by exposure to and use of multilane freeways. Low income people often end up living in the worst adjacent-location exposures to the effects of large freeways, and an analysis at census tract scale does not capture this effect. We don't find these concerns adequately addressed in the DEIR.

In conclusion, the public's expectation for clear, accurate, current, science-based information in a Draft EIR has not yet been met. The public and commenting agencies have not been presented with the quality of information needed for making informed comments.

Accordingly, the DEIR should be withdrawn, reconceived especially as to goals and alternative projects, corrected and updated, and recirculated as a revised Draft EIR.

The Campaign for Sensible Transportation appreciates in advance, your consideration and action on these comments.

Sincerely,



Jack Nelson, Co-chair, Campaign for Sensible Transportation

cc: Santa Cruz County Regional Transportation Commission