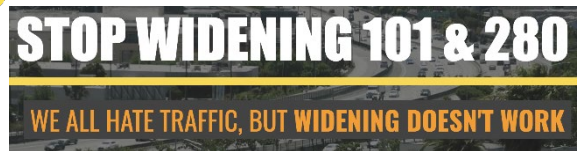


ClimatePlan TRANSFORM



May 28, 2025

Matthew Yosgott
Deputy Director - SB 1 Programming
California Transportation Commission (CTC)
1120 N Street MS 52
Sacramento, CA 95814

Re: Applications of Concern for SB 1 Funding (SCCP, TCEP, LPP Programs)

Dear Deputy Director Yosgott,

The undersigned organizations write to express concerns about a number of highway expansion project applications for SB 1 funding under the Solutions for Congested Corridors Program (SCCP), Trade Corridor Enhancement Program (TCEP), and the Local Partnership Program (LPP) that we have listed below. Our concerns about these projects relate to their inconsistency with the Climate Action Plan for Transportation Infrastructure (CAPTI), their likelihood to significantly increase driving, their environmental, climate, and displacement impacts, and their conflicts with California's climate and equity goals. We urge the Commission to scrutinize these projects closely and only fund the components of these projects that reduce driving, improve

multimodal options, and advance the zero-emission fleet transition. Several of the projects listed are opposed locally by organizations in the ClimatePlan network that are also signed on to this letter. We have linked to opposition letters to specific projects in the footnotes.

Solutions for Congested Corridors Program (SCCP)

We are very pleased to see the high number of transformative multimodal and vehicle miles traveled (VMT) reducing projects and components of projects among the list of applications for SCCP this cycle. We particularly appreciate the innovative project applications that aim to improve highway operations in congested corridors without adding new lanes, such as the ***I-805 South Managed Lanes HOV to HOT Conversion Project*** which will reinvest toll revenue into transit and active transportation infrastructure.

We encourage the CTC to only fund projects and project components that reduce VMT and avoid adding new lanes to highways and roadways. Specifically, we urge the CTC not to fund the following highway expansion projects and project components:

1. **SR 1 – Freedom to State Park Auxiliary Lanes¹ (Also an LPP and TCEP application, comments apply to that program as well)** - This auxiliary lane expansion project is a component of the Watsonville-Santa Cruz Multimodal Corridor Project and is opposed by local advocates challenging the project. As articulated in the Sierra Club chapter letter linked in the footnote, this application for SCCP/TCEP/LPP has some multimodal components that enjoy support from the community and we encourage the CTC to fund these components without the auxiliary lanes.
2. **101 Multimodal Corridor Segment 4E North – Cabrillo Interchange (Also an LPP and TCEP application, comments apply to that program as well)** - This expansion project is a component of the Santa Barbara US 101 Multimodal Corridor Project and was opposed by local advocates. This application for SCCP/TCEP/LPP also has many strong multimodal components that enjoy support from the community and we encourage the CTC to fund these components of this project. Since most of the corridor has already been widened, we recognize that restricting lanes in this short segment could decrease air quality. However, the HOV lanes have limited effectiveness because of their limited time duration and operational requirements for only 2 or more occupants. We encourage CTC to fund the HOV component only with expanded HOV operational requirements for additional hours and 3 or more occupants.
3. **I-5 Managed Lanes Multimodal Operational Improvements (Orange County)** - This project adds 16 lane-miles of new HOV lanes that will exacerbate freeway congestion and air quality issues without a clear commitment to invest in transit alternatives. We would support the portion of this project that converts existing HOV lanes to express lanes if those components could be funded separately from the lane expansion components and if toll revenues were committed to providing multimodal alternatives.

¹ [Sierra Club to CTC on SR-1](https://drive.google.com/file/d/1mzuzGdvoWviBsOHhuy8rzwJOPGmgb4ql/view?usp=sharing)
<https://drive.google.com/file/d/1mzuzGdvoWviBsOHhuy8rzwJOPGmgb4ql/view?usp=sharing>

4. **SR 37 Sears Point to Mare Island Improvement Project – Phase 2² (Also an LPP and TCEP application, comments apply to all three programs)** - The sign on letter linked in the footnote demonstrates the local advocate opposition to this “interim” lane expansion project, and states that “the interim project will cost over \$500M and will be under water caused by sea level rise within fifteen years of completion. Continuing the interim project in its current form further delays, rather than advances, the long-term vision for the corridor.” We have serious concerns about investing any state funding in a roadway that may be inoperable as soon as 2040.
5. **I-15 Express Lanes Project Southern Extension (ELPSE)³ (Also an LPP application, comments apply to that program as well)** - This project will add over 60 lane-miles to I-15 in a congested and growing region and does not include multimodal and VMT reducing components. As detailed in the comment letter on this project’s draft environmental impact report linked in the footnote, this project will induce significant VMT and relied on outdated and flawed methodology for estimating air quality and other impacts.
6. **I-680 NB Express Lane Completion Phase 1⁴** - This express lane expansion project is a component of the Innovate 680 project. Though this SCCP application appears to only be requesting funds for the Shared Mobility Hubs and TDM Augmentation components of the larger project, we still want to highlight the concerns raised by Transform in their comment letter to Caltrans regarding flawed analysis in the draft EIR for this project, linked in the footnote.

Trade Corridor Enhancement Program (TCEP)

We are again pleased to see the increase in TCEP applications this cycle that would advance freight electrification, technology, and efficiency at ports and truck parking hubs. We strongly support investing TCEP funding in these types of projects that are well-aligned with CAPTI and reduce harmful impacts to communities that bear the brunt of pollution from the freight industry. We encourage the CTC to focus funding only on those types of projects and avoid funding any projects that increase passenger VMT by adding general purpose lanes to roadways.

In addition to the projects listed above that are applying for both SCCP and TCEP, we have concerns about the following TCEP applications:

1. **SR 60/World Logistics Center Pkwy Interchange** - This project entails a significant expansion and new connection for an existing interchange that will open up land for more warehouse and sprawl development and induce significant new passenger VMT.

² Sign on comment letter SR-37 <https://transformca.org/wp-content/uploads/2024/09/Sign-on-Letter - Oppose-Backdoor-Streamlining-for-HW-37.pdf>

³ [Sign on comment letter I-15 DEIR https://drive.google.com/file/d/1P8Tr5ZF3zWvByCTWY_bwlo957Ab7Q3jM/view?usp=sharing](https://drive.google.com/file/d/1P8Tr5ZF3zWvByCTWY_bwlo957Ab7Q3jM/view?usp=sharing)

⁴ [Sign on comment letter Innovate 680 DIER https://transformca.org/wp-content/uploads/2024/07/I-680-NB-Express-Lanes-Comment-Letter.docx.pdf](https://transformca.org/wp-content/uploads/2024/07/I-680-NB-Express-Lanes-Comment-Letter.docx.pdf)

2. **Konocti Corridor - Segment 2B** - This project will add 16 general purpose lane-miles to convert the existing conventional highway between Kelseyville and Clear Lake to a four-lane expressway and will induce passenger VMT.
3. **Tulare SR 99 Corridor and Paige Avenue Multimodal Interchange Enhancements** - We do not support the capacity-increasing general purpose lane additions to SR 99 which will induce significant passenger and truck VMT. The project as approved further separates South City of Tulare and the neighboring unincorporated community of Maheny Tract by providing the transportation system for the growth of the City's industrial zones which separates the aforementioned communities. The Project does not improve connectivity for pedestrians and cyclists. At the bare minimum the project proposes a shared paved path, not even a sidewalk, between Blackstone St. and Laspina St, which do not extend into the residential communities to the East and West of the project site. We recommend a project alternative which will result in reduced traffic congestion while also improving pedestrian and active transportation options for the community, instead of facilitating industrial growth and highway capacity for freight.
4. **State Route 46 Antelope Grade Corridor Improvements Project** - This project will add five general purpose lane-miles to convert the existing conventional highway over Antelope Grade to a four-lane expressway and induce passenger VMT.
5. **State Route 132 Phase 3A Project** - This project will add 14 new general purpose lane-miles to extend a new expressway that creates a bypass for SR 132 and opens up new land for warehouse and sprawl development and induce new passenger VMT.
6. **State Route 71 Gap Closure Phase 2 Project (*Also an LPP application, comments apply to that program as well*)** - This project will convert an existing arterial highway into an 8-lane freeway, adding a general purpose and HOV lane in each direction. We do not support the highway lane addition portions of this project, which will induce significant passenger VMT and limit the freight benefits. However, we support the components of the project that provide sound walls and noise mitigation, update rail bridges to current standards, and enhance a pedestrian overcrossing.
7. **SR 46 East/Union Road Intersection Improvements** - This project entails a new interchange that will open up land for sprawl development and induce significant new passenger VMT.
8. **680/SR-4 Interchange Improvement (*Also an LPP application, comments apply to that program as well*)** - This project will add a direct connector with two general purpose lanes to the interchange of I-680 and SR-4 without mitigation for increases to passenger VMT.

Local Partnership Program (LPP)

In addition to the projects listed above that have applied for SCCP and/or TCEP in addition to LPP, we have concerns about the following additional application for LPP:

1. **Madera 41 South Expressway Project** - This project will add eight general purpose lane-miles to convert the existing conventional highway to a four-lane expressway, increasing access to land that is rapidly converting to sprawl development and significantly increasing passenger VMT. Rather, we urge the CTC to support projects

which truly meet the purpose of the LPP which includes addressing aging infrastructure, road conditions, active transportation, transit and rail, and ensuring health and safety benefits. Madera County is currently unable to meet existing transportation needs, including maintenance and transit of existing communities. Funding additional roadways for the purpose of sprawl contradicts the purpose of the LPP, will increase emissions, and divert critical funding needed to support the current transportation system in Madera County.

We appreciate the opportunity to provide comments and amplify project concerns from local organizations as commission staff reviews the SB 1 applications. We look forward to further engagement with CTC staff and commissioners once the staff recommendations are released.

Thank you for your attention to our concerns and for your leadership in guiding California toward a more sustainable and equitable transportation future.

Sincerely,

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Transform

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Genesis: Interfaith Organizing in the East Bay

Jeanie Ward-Waller
ClimatePlan

Marven Norman
Center for Community Action and Environmental Justice (CCA EJ)

Jared Sanchez
CalBike

Elizabeth Reid-Wainscoat
Center for Biological Diversity

Chance Cutrano
Resource Renewal Institute

Matthew Baker
Planning and Conservation League

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Sofia Rafikova
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Heather Deutsch
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Stop the 101 & 280 Widenings in San Mateo County

Iman Sylvain, PhD
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David Diaz, MPH
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Carter Rubin
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Transbay Coalition

Justin Hu-Nguyen
Bike East Bay

David Levitus
LA Forward

Hana Creger
The Greenlining Institute

Aditi (Adi) Varshneya
California Environmental Justice Alliance (CEJA) Action

Emma De La Rosa
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Jonathan Matz
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