



March 18, 2023

Carl Gardino, Chair
California Transportation Commission
1120 N Street (MS-52)
Sacramento, CA 95814
ctc@catc.ca.gov Submitted via email

Re: **Letter In Support of SHOPP Project 06-0X370 – Bakersfield 99 Rehabilitation II (south) with Aux Lane** (March 21-22, 2024 CTC Agenda Tabs 45, 81, & 117)

Dear Chair Gardino:

The Regional Transportation Planning Agency for Kern County supports funding of safety projects on our state highway system. We encourage the approval of existing carryover projects and new projects included in the 2023 State Highway Operations and Protection Program (SHOPP). Note that the Bakersfield 99 Rehabilitation II (south) project is important to improve safety for the residents of the disadvantaged communities in Kern County which now make up more than 2/3rds of our population.

The segment of southbound freeway 99 planned for an auxiliary lane has seen three fatalities and 78 crashes since 2015. Two of those crashes involved trucks, and our region is seeing significant industrial and warehouse growth which are essential for our region as we shift to a more sustainable economy and replace jobs lost from the curtailment of oil and agriculture sectors brought on by state policies.

Concepts such as induced demand, although important, do not work the same in more rural areas like Kern as they do in the much more congested urban areas of our state. Please avoid a one-size-fits-all approach to evaluating which projects to use SHOPP funding on. This project also reduces stop-and-go traffic on this freeway segment, lowering overall emissions, and benefiting existing transit service used by the corridor. Use SHOPP to invest in our historically underserved communities with more safety projects.

Thank you for considering this information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ahron Hakimi'.

Ahron Hakimi
Executive Director

Enclosure: Overview/Comments on SHOPP Project 06-0X370

SHOPP 06-0X370 Bakersfield 99 Rehab II (South)

Graphics from Negative Declaration Environmental Document, September 2023
 – State Clearinghouse Number 2023080051

<https://dot.ca.gov/-/media/dot-media/district-6/documents/d6-environmental-docs/06-0x370/sr99-bkrsfld-rhbltn-sth-f-060x370-0923-a11y.pdf>

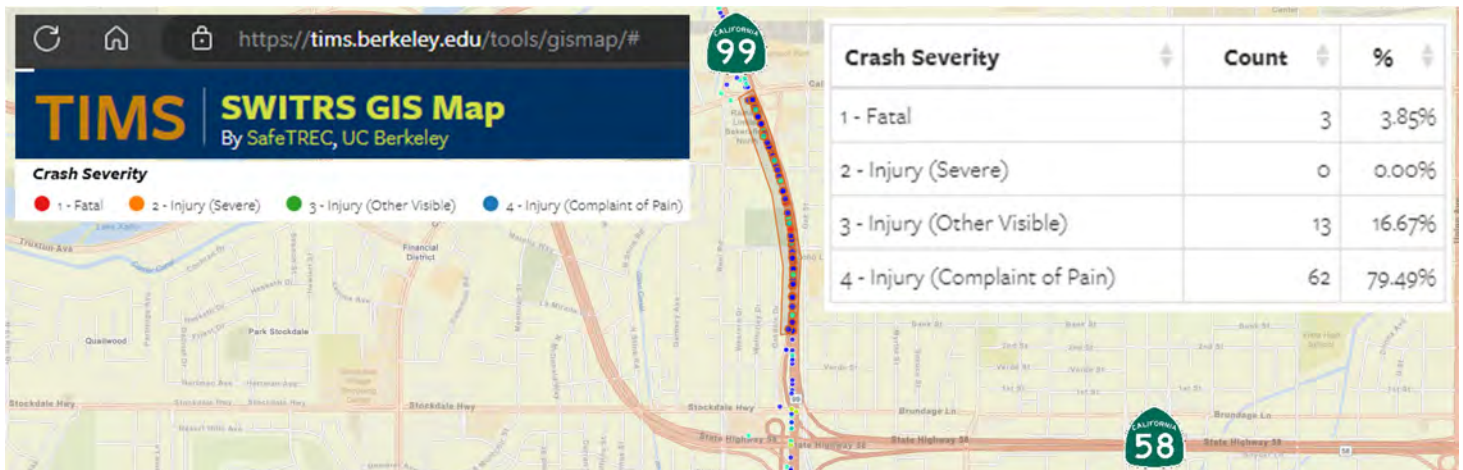
Figure 1-1 Project Vicinity Map



99 Southbound 58 Flyover Off-ramp Requiring an Approach Auxillary Lane



CHP Recorded 78 Vehicle Crashes and 3 Fatalities on 99 Southbound between California Ave and SR 58 From 2015-2022



March 2024 Comments in Favor of SHOPP Project

06-0X370 Bakersfield 99 Rehab II (South) – Version 5

(Includes 99 SB Aux Lane Between California Ave & SR 58)

- 1) **Environmental Process Bait & Switch** – A negative declaration environmental document was completed in September 2023 for this rehab/safety project and included the Aux Lane. Removing the Aux Lane from the project would result in a bait-and-switch situation for the public that reviewed that environmental document. It is too late to remove the Aux Lane.
- 2) **CEQA Aux Lane Exemption** – State guidelines provide exemptions for Aux Lanes less than 1-mile. **This Aux Lane is only a little over 1/2 mile long.** The Caltrans Highway Design Manual Section 62.1(1) a) defines an auxiliary lane as: *"The portion of the roadway for weaving, ...speed change, or for other purposes supplementary to through movement."* In 2018, The Governor's Office of Planning and Research (OPR), established guidance that states: *"Projects that would **not** likely lead to a substantial or measurable increase in vehicle travel... include: Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety."* This is because the merge-diverge influence area per the TRB Highway Capacity Manual is 2,500 ft. – which is 2,500 ft from the on-ramp (merge influence) and 2,500 ft from the off-ramp (diverge influence). That's 5,000 ft. total of merge-diverge influence. For the project in question, 0.6 mi distance of aux-lane is 3,200 ft which means the entire length of this project area is dominated by merge-diverge vehicle interactions – providing a safety benefit and is NOT conducive to thru-capacity particularly during peak periods when vehicle densities are greatest.

- 3) **New Research on Induced Demand** - Based on a comprehensive review of academic literature on induced travel demand, the findings from the Rural Induced Demand Study (scheduled for release this month) indicate that added lane-miles is a poor proxy for estimating induced demand. Especially in more rural areas with low congestion like this project. What drives the potential for induced travel demand is a significant reduction in travel times, not additional capacity. Hence, adding lane miles in the absence of congestion does not necessarily induce demand. The only reason lane-miles have been used in induced demand studies is because lane mile data was much easier to obtain than historical data on congestion levels. Based on revealed preference surveys of travelers, only significant reductions in travel times will change travel behavior (for example, travel time reductions of at least 15 minutes are needed to influence origin-destination choice). Travel time savings from this project are considerably less than 15 minutes.
- 4) **This Project Will not Induce Demand Like Aux Lanes in LA** – An Aux Lane in L.A. introduced on a corridor that has an LOS F 12 hours per day has a much greater induced demand than this Aux Lane project which is LOS F for less than 1 hour per day. Again this project is primarily for safety, not congestion relief.
- 5) **Congestion Management Federally Required** – Federal law requires a congestion management process. Federal Title 23 Section 450.320(b) states: *“...explicit consideration is to be given to the incorporation of appropriate features into a Single Occupancy Vehicle project to facilitate ... operational improvements that will maintain the functional integrity and safety of those lanes.”* This project is federally required as an operational improvement that will maintain safety.

- 6) **Back in 2006** a SHOPP project at this SR 58 ramp was funded by Governor Davis' "GO California" program and was projected to only relieve congestion for 20 years. This new project will extend the useful life and safety of that project.
- 7) **Micro-Transit Corridor** – Note that Metropolitan Bakersfield now benefits from a new, more efficient curb-to-curb, on-demand, ride-sharing micro-transit service. That service along with express transit routes in 99 will benefit greatly from the safety improvements created by the Aux Lane.
- 8) **Alternative Climate Resiliency Corridor** – This Aux Lane is an extension of the existing ramp to SR 58 over Tehachapi Pass. The recent I-80 closure due to extreme snow conditions made SR 58 the only pass open across the Sierra Nevada Mountains, providing an important Climate Resiliency alternative route for I-80. In addition, SR 58 over the Sierras already serves 25% more trucks than the I-80 Donner Pass due to its connection in Barstow to the highest volume national goods movement corridor, I-40. SR 99 was also designated as one of the top 6 Corridors in the Clean Freight Corridors Report.
- 9) **A Dangerous Freeway Segment** – **CHP accident data for this stretch of freeway 99 without the aux lane has seen 3 fatalities and 78 crashes since 2015. That is over 100 crashes per mile in just 8 years.** This project will save lives. In addition, the segment is on the National Highway Freight Network, Primary Highway Freight System with 22% of the vehicles being trucks, two of which were involved in 3 of the fatal crash incidents.
- 10) **Benefits A Disadvantaged Region** – Note that the project is located at the heart of Kern County, a region that has grown from just under 50% minority population to 2/3rds in the past 20 years. **Elimination of this safety Aux Lane project will disproportionately impact the safety of travelers who are predominantly from disadvantaged communities.**



March 19, 2024

Carl Guardino, Chair
California Transportation Commission
1120 N Street MS-52
Sacramento, CA 95814

Re: Letter In Support of SHOPP Project 06-0X370 – Bakersfield 99 Rehabilitation II (south) with Aux Lane

Dear Chair Guardino:

The San Joaquin Valley Regional Policy Council (Policy Council) supports funding of safety projects on our state highway system. We encourage the approval of existing carryover projects and new projects included in the 2023 State Highway Operations and Protection Program (SHOPP). The Bakersfield 99 Rehabilitation II (south) project is important to improve safety for the residents of the disadvantaged communities which now make up more than two-thirds of the population of Kern County.


This segment of State Route 99 has seen three fatalities and 78 crashes since 2015. Two of those crashes involved trucks as our region is seeing significant industrial and warehouse growth as we shift to a more sustainable economy and replace jobs lost from the declining oil and agriculture sectors.


Concepts such as induced demand, although important, do not work the same in more rural areas like Kern as they do in the much more congested urban areas of our state. Please avoid a one-size-fits-all approach to evaluating which projects are eligible for SHOPP funding. This project also reduces stop and go traffic on this freeway segment, lowering overall emissions, and benefiting existing transit service used by the corridor. We encourage you to use SHOPP funds to invest in our historically underserved communities while maintaining safety as a priority.

Sincerely,


A handwritten signature in blue ink, appearing to read "Daron McDaniel".

Daron McDaniel
Chair of the San Joaquin Valley Regional Planning Agencies Policy Council
Merced County Supervisor

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