

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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Subject: Environmental Document Review and Response, SCH# 2020079005

To Whom It May Concern:

After reviewing SCH# 2020079005, as well as the information and procedures outlined in General Order 41.2, "Environmental Impact Documents," the Santa Cruz Area renews our opposition to the bus-on-shoulder concept of this project, since this same idea is mentioned several times throughout this document. Motorists involved in traffic collisions, experiencing medical emergencies, or who have mechanical troubles, are instructed to move to the shoulder and out of the traffic lanes. Peace officers respond to these incidents make all efforts to move the involved vehicles off the freeway or to the right shoulder to minimize secondary traffic collisions and the associated risks. When officers make traffic stops on the freeway, drivers pull to the shoulder and stop, as they are instructed to do in driving classes and per California Vehicle Code section 21806. Based on past experiences in Santa Cruz County, if busses (or other vehicles) are allowed to drive on the shoulder, other motorists will undoubtedly follow suit, creating an additional lane and removing the availability of the shoulder for true emergencies. The proposal would allow busses to use the shoulder when the speed of traffic drops below 35 miles per hour, and busses would be permitted to travel no more than 10 miles per hour over the speed of traffic. Large vehicles, such as busses, traveling at potentially 45 miles per hour on the shoulder would present an unnecessary safety risk to motorists and emergency vehicles stopped on the shoulder. Busses driving on the shoulders, and the inevitable vehicles which follow them, may cause confusion for other motorists and result in an increase of traffic related collisions in the area. This would cause additional responsibility and the CHP Santa Cruz Area does not have the resources or funding needed to provide the necessary enforcement to improve the safety of this practice. These scenarios have the potential of making the roadways more dangerous and increasing liability for the State and all involved government agencies. Authorizing any vehicle to drive on the shoulder may cause an undue safety hazard to the motoring public, road workers, and peace officers working in the area. If the bus-on-



shoulder program were to progress, additional discussion would be needed due to the aforementioned reasons.

Regarding the proposed Streetscape concept for the Portola Drive corridor, the CHP Santa Cruz Area opposes a reduction in the amount of lanes in the corridor. Based on the feedback CHP received and public comments from the pilot study conducted in June 2021, not only did the reduction in lanes cause more traffic congestion, but also affected access into the local businesses, and caused confusion amongst motorists. Motor vehicle traffic was “bottlenecked” in several locations where the pilot study was taking place, causing frustration and erratic behavior from motorists. Also, the proposal does not take into account the high amount of motor vehicle traffic as a result of tourism. Portola Drive is a popular location for tourists. Visitors have no other means of travel, other than motor vehicles, to get to, and move about the area. The current design of Portola Drive accommodates bicyclists, as they are afforded the same rights as motor vehicles on the roadway. The proposal would inevitably increase the amount of pedestrians, bicycles, and vehicles of all types when a high density residential use development is built, worsening traffic delays and posing a safety risk to all users of the roadway. The potential benefit from increasing the amount of bicycle lanes and parking would not outweigh the congestion, frustration, and safety risks the increased pedestrian, bicycle and motor vehicle traffic will cause.

If you have any further questions, please call myself or Sergeant Elizabeth Addy at (831) 662-0511.



A. H. CHING, Captain
Commander

Enclosures

Cc: Special Projects Session