December 19, 2025

Julia Mousavi
Environmental Planner
Caltrans
50 Higuera St.
San Luis Obispo, CA 93401

RE: Notice of Preparation of a Programmatic Environmental Impact Report for State Route 25 Corridor Improvement Project

Dear Julia Mousavi,

Bay Area Air District (Air District) staff have reviewed the Notice of Preparation (NOP) of a Programmatic Environmental Impact Report (PEIR) for the State Route 25 Corridor Improvement Project (Project) and prepared the following comments.

The Project, located in San Benito County and Santa Clara County, proposes a series of phased multi-modal and roadway upgrades along approximately 10.2 miles of State Route 25 between Hollister and Gilroy. The Project location is currently experiencing rapid growth in population, a jobs-housing imbalance, and substantial peak-period congestion that has led to diversion onto rural roads without effective regional transit options. In response, this Project seeks to increase efficiency and livability in the area by reducing severe collisions, enhancing multimodal travel choices, improving travel-time reliability, supporting goods movement, and expanding access to major job and service centers in Santa Clara County.

The Project proposes a broad range of alternatives which include various combinations of four primary design elements:

- General purpose lanes;
- High occupancy vehicle (HOV);
- High occupancy toll (HOT); and
- Transit-only options.

Environmental Justice:

The Santa Clara segment of the Project is located in an Air District Overburdened Community, as defined by Regulation 2: Permits, Rule 1: General Requirements, Section 243 – Overburdened Communities[1]. Further, the Santa Clara segment is also a Disadvantaged Community as defined by Senate Bill 535 (De Leon, Chapter 830, Statues of 2012) and based on CalEnviroscreen (CES) 4.0. Also, according to CES 4.0, this community is within the 89th percentile for pollution burden, as well as within the top 25th percentile for Environmental Effects including Solid Waste, Hazardous Waste, and Cleanup Sites. According to CES 4.0, the Project is located in a census tract that has a population of 2,404 people, of which 53 percent are people of color.

[1] Bay Area Air District. Regulation 2: Permits, Rule 1: General Requirements. https://www.baaqmd.gov/~/media/dotgov/files/rules/reg-2-permits/2021-amendments/documents/20211215_rg0201-pdf.pdf?rev=103cc60e706947d3ad1e4f5a090483c1&sc_lang=en

Due to the location of the Project and the potential air quality impacts to the community, the Air District strongly recommends Caltrans implement Environmental Justice principles as defined in Chapter 2 of the Air District's California Environmental Quality Act (CEQA) Guidelines, entitled, "Best Practices for Centering Environmental Justice, Health, and Equity."[2] Consideration and discussion of race, demographics, social determinants of health, and land use history of a potentially impacted community is crucial to a proper and thorough environmental review.

Additionally, Caltrans should complement the identification of environmental justice communities with ground truthing to supplement technical information with local knowledge and lived experiences to inform the Project design. The Air District's 2025 CEQA Guidelines Supplemental[3] provides additional guidance for implementing best practices for centering environmental justice, health, and equity.

Although the NOP, states, "*All comments previously submitted to Caltrans during the 2024 NOP review period (November 8, 2024, to December 31, 2024) have been retained by Caltrans. If you submitted comments previously, they have been retained and do not need to be resubmitted."* The Air District recommends that Caltrans welcome any and all comment letters to encourage robust engagement and feedback on the Project, especially as the scope of the Project has changed since the 2024 NOP.

Air Quality:

While highway expansion projects may initially relieve congestion, studies have indicated these types of projects increase driving on the roadway segment (referred to as 'induced demand') by up to 10% over the long run, resulting in increased vehicle miles traveled (VMT) and congestion[4]. Increased VMT correlates with higher emissions of ozone precursors including nitrogen oxides (NO_x) and volatile organic compounds (VOC), greenhouse gases, and particulate matter (PM) from tailpipe exhaust, as well as tire and brake wear and re-entrained road dust. These emissions further degrade air quality and increase human exposure to toxic air contaminants including diesel PM emissions. This is concerning, given that the Air District's Advisory Council has found that "PM is the most important health risk driver in Bay Area air quality, both $PM_{2.5}$ as a criteria pollutant and diesel PM as a toxic air contaminant."[5]

Due to the Project being located in an Overburdened / Disadvantage Community and the potential for induced demand, the Air District recommends that the PEIR include analysis of air pollution impacts of the Project. The Air District recommends that Caltrans select and analyze a Project alternative that prioritizes high-quality transit options and/or includes pricing mechanisms to mitigate increases in VMT such as the Commuter Rail Service or the 4-lane Expressway with HOT Lanes alternatives.

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[2] Bay Area Air District. 2022 CEQA Guidelines, Chapter 2, "Best Practices for Centering Environmental Justice, Health and Equity". https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-2-environmental-justicefinal-pdf.pdf?rev=724445e52f394fe1ab3d3b1636b6d023&sc_lang=en

[3] Bay Area Air District. 2025 CEQA Guidelines Supplemental. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/tools/california-environmental-quality-act-guidelines-supplemental_april-2025-pdf.pdf?rev=31b9ea743b354b25b67b4cd244d0a322&sc_lang=en

[4] Volker, J.M.B., & Barajas, J.M. (2025, April). California Air Resources Board. Roadway Capacity and Induced Travel. https://ww2.arb.ca.gov/sites/default/files/2025-04/Roadway%20Capacity%20and%20Induced%20Travel%20-%202025%20Policy%20Brief.pdf

[5] Hayes, S. et al (2020, December). Bay Area Air District. Particulate Matter; Spotlight on Health Protection, Advisory Council Particulate Matter Reduction Strategy Report. https://www.baaqmd.gov/~/media/files/board-of-directors/advisory-council/2020/ac_particulate_matter_reduction_strategy_report.pdf?rev=570867c8b25e4ca0b2f93f80c4c1ef02&sc_lang=en

Project Analysis:

The Air District recommends the PEIR includes the following analyses:

- **Induced Demand Analysis**: Quantify potential VMT increases as a result of the Project and Project Alternatives including HOT and Transit-only options, in accordance with Senate Bill 743 (Steinberg, Statues of 2013)
- **Air Quality:** Quantify emissions impact as a result of the Project and Project Alternatives for criteria pollutants and diesel PM. This analysis should include tailpipe exhaust emissions as well as tire wear, brake wear and re-entrained road dust. Additional guidance can be found in the Air District's CEQA Guidelines[6] and in Appendix E, "Recommended Methods for Screening and Modeling Local Risks and Hazards" of the Air District's CEQA Guidelines[7].

Mitigations:

To reduce emissions resulting from operation of the Project, the Air District recommends the Project implement all feasible measures for reducing VMT from single occupancy vehicles and tail pipe emissions, including:

- Working with the Air District and the Metropolitan Transportation Commission to ensure business centers in Santa Clara County participate in the Bay Area Commuter Benefits Program.[8]
- Increasing transit service frequency.
- Providing bus rapid transit.
- Installing sensitive receptor protections such as vegetative barriers to reduce near-roadway emission exposure.

To reduce emissions resulting from Project construction, the Air District recommends the Project implement all feasible measures for construction, including:

- Requiring off-road construction equipment to be zero-emission equipment as the primary mitigation measure, and alternatively allowing construction vehicles and construction equipment to operate with Final Tier 4 engines using renewable diesel or zero-emission drivetrains, as commercially available when zero-emission equipment is not feasible.
- Require on-road haul trucks to have zero-emissions engines. If zero-emissions engines are not available, require haul trucks with engines that are no more than eight years old.
- Prohibiting trucks from idling for more than two minutes or prohibiting idling altogether.
- Prohibiting portable diesel generators on the construction site where grid power is available or use alternatively-fueled generators such as propane or solar electrical power.
- Implement the Air District's Basic and Enhanced Best Management Practices (BMP) for Construction to reduce fugitive dust.[9]

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[6] Bay Area Air District. 2022 CEQA Guidelines. https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

[7] Bay Area Air District. 2022 CEQA Guidelines, Appendix E, "Recommended Methods for Screening and Modeling Local Risks and Hazards". https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en

[8] Bay Area Air District. Regulation 14 Mobile Source Emission Reduction Measures Rule 1 Bay Area Commuter Benefits Program. https://www.baaqmd.gov/rules-and-compliance/commuter-benefits

[9] Bay Area Air District. 2022 CEQA Guidelines, Chapter 2, "Project-Level Air Quality Impacts", Table 5-2 for Basic and Table 5-3 for Enhanced best management practices for construction. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en

If you have any questions or would like to discuss the Air District's comments further, please contact Monte DiPalma, Senior Air Quality Engineer, mdipalma@baaqmd.gov.

Sincerely,

Greg Nudd, Deputy Executive Officer of Policy
Bay Area Air District

CC: Vice Chair Vicki Veenker
Director Margaret Abe-Koga
Director Otto Lee