

**Comments**  
**Of the**  
**Cherry Hill Environmental Protection Advocates**  
**(“CHEPA”)**  
**On**  
**The draft reports**  
**Of the**  
**Congestion Buster Task Force Subcommittees**  
**Dated**  
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**By**  
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**Secretary**

1. Twenty years ago enlightened leadership at the New Jersey Department of Transportation (NJDOT) concluded, “We cannot build our way out of congestion.” NJDOT was of course referring to road construction.
2. Yet despite twenty years of experience and two new studies that validate the concept that increasing traffic capacity on roads inevitably leads to even greater congestion, and despite a yawning state budget deficit, NJDOT and the Goods Movement Subcommittee of the Congestion Buster Task Force continue to advocate new capital intensive road construction to address congestion! These projects are euphemistically described as “widening, enhancements, improvements, intersection realignments, auxiliary lanes, reconfiguration of interchanges, replacing existing bridges, and adding capacity through traffic bypasses, improved horizontal and vertical geometry, eliminating bottlenecks, realigned ramps, acceleration and deceleration lanes, new connector roads, adding full width shoulders, extensions and truck only lanes.” But no matter what they are called, they will increase capacity and increase congestion on a grander scale.
3. Two recent studies substantiated the obvious fact that adding road capacity by itself generates significantly more traffic. The findings, presented at a national conference of transportation experts, showed that between a quarter and half of the new capacity in the Washington, D.C. region was used up simply because more motorists were attracted to it.<sup>1</sup> This was the first research to examine the Washington area to gauge an effect called "induced travel." This is the amount of added traffic that occurs, for instance, when motorists take advantage of a new lane to make more or longer trips or to switch from transit to driving. In the long run, induced travel also occurs as the wider road allows nearby development to accelerate, producing even more traffic.
4. The studies showed that building or widening roads to reduce congestion is fruitless. "If you're simply widening congested roadways with the idea you'll get rid of congestion, that's naive," said Lewis M. Fulton, an American policy analyst based at the International Energy Agency in Paris and author of one of the reports. His study used 26 years of data from every county in Maryland, Virginia and North Carolina. In the Washington-Baltimore metropolitan area, the analysis concluded that about one-third of the added road capacity on main highways--whether new lanes or entirely new roads--was used up by induced travel; every 10 percent expansion in roads led directly to a 3.3 percent rise in the number of vehicles driving on them.

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<sup>1</sup> Sipress, Alan, “More Lanes Better? Not Necessarily: Traffic Increases, Studies Find,” The Washington Post, January 13, 2000

5. The statewide results from Maryland and Virginia were even more dramatic, showing that about half of added road capacity was filled up because of induced travel. A 10 percent expansion in roads led to a 4.5 percent increase in motorists in Maryland and a 5.1 percent increase in Virginia.
6. New Jersey will not end traffic gridlock until there is more funding and careful planning to provide real alternatives to trucks and single occupant automobiles. Our state transportation corridors have no sidewalks or bike paths. Pedestrians cannot even cross state roads safely on foot or bike because there are no crosswalks with striping or signage. Many people have to drive to the corner store because there are no other safe options.
7. New Jersey has generated, fueled and accommodated suburban sprawl by building roads to every area of the state and returned periodically to increase the volume capacity as rural land turned to suburbs. The greater the capacity of the adjacent road, the greater the intensity of adjacent land uses. Any child who plays Sim City understands this phenomenon. The more we spend on roadway expansion, the more we will have to spend in the future.
8. The Task Force should more clearly articulate the need to “move people and goods” not just move “cars and trucks.” Even more important, it should stress the importance of mixed land uses and smart development that reduce the need to travel, especially during peak periods, and that can be serviced by a transportation center that connects travels to multi modes.
9. New Jersey needs to develop a multi-modal integrated transportation system that will not morph to accommodate poor municipal planning and variance “give-aways” to developers.
10. Recommendation # 4 of the draft Goods Movement report (dated March 19, 2002) recommends support for just 13 “roadway improvement projects” that are estimated to cost a total of \$2 billion. Just Phase 1 of one of these projects (the Portway) would consume almost half of these funds (\$800 million). The draft states that “the volume of goods moved through the ports is expected to triple in the next 20 year” and that “to meet this tremendous demand, the New Jersey Department of Transportation is advancing a series of road improvements referred to as “Portway” to provide “access routes” to “global and domestic commerce for the State and the greater metropolitan New York region.” (p. 8) Further it would stimulate economic development by “encouraging brown field remediation at adjacent development sites.” (p. 8)

11. While these goals may be desirable from an economic development point of view, the Congestion Buster Task Force **should delete the \$800 million Portway project and all other widening proposals from its report.** These include:
- The \$60 million Route 1 & 9 Viaduct Widening to three lanes over the Elizabeth River;
  - The \$100 million Route 1 and 9 Widening to three lanes in Edison, Woodbridge, Rahway and Linden;
  - The \$243 million Route 1 & 9 through traffic bypass of the Tonnele Circle in Jersey City; the \$200 million Route 3 widening in the vicinity of the Passaic River; the \$19 million Route 9 widening and elimination of Victory Circle; and
  - The \$22 million Doremus Avenue Roadway widening project that is really part of Portway.
12. **These projects will not reduce congestion. They are designed to increase capacity and accommodate and encourage additional truck and commuter traffic.**
13. **The Task Force was chartered to cap peak hour vehicle trips at 1999 levels. (C.27: 1B-21.26) and to recommend travel reduction strategies. These project recommendations are contrary to the Task Force's statutory mandate and should be deleted from the report.**
14. The New Jersey State Plan attempts to ensure that land use and development are thought out in concert with infrastructure investments, and has been viewed as a solution to NJ's urban dis-investment, suburban sprawl and open space depletion. One of its primary enforcement tools is directing state infrastructure capital spending. The Commission and staff of the Office of State Planning adopted the Tri-State Transportation Campaign's 1997 recommendation by making preservation and maintenance of NJ's existing road and bridge system the top priority for transportation spending. This priority must be linked to all plans with a stated de-emphasis on expanding highway capacity.
15. The Congestion Buster Task Force reports should eliminate all passages and recommendations that expand highway capacity, including any that encourage service roads (which widen highway rights of way and separate nearby communities); that promote limited access bypass roads (many new highways NJ DOT is planning are bypasses of downtowns and will likely lure development away from those downtowns); and that endorse goods movement policy that promotes exclusive rights-of-way for trucks (subsidizing the most polluting, energy-intensive and pavement-destructive mode just as competitive rail freight tries to gain a foothold in the region).

16. The only exclusive truck right-of-way under discussion in NJ is Portway, a truck-only highway linking intermodal facilities between Little Ferry and Elizabeth, the State Plan's language about truck rights of way. The Task Force should not endorse Portway. The railroads (CSX and Norfolk Southern) that now occupy that territory and Union County have begun to seriously question Portway, preferring improved ramps to the Turnpike (which has dedicated truck lanes) instead as a cheaper solution to a new truck highway.
17. The Task Force should specifically delete any recommendations for and should specifically oppose all freeway "bypasses" as solutions to downtown traffic and congestion. Empirical evidence demonstrates that bypasses increase traffic congestion and induce sprawl development; after a study by the British highway agency showed that bypasses worsen traffic instead of improve it, the UK put an end to all bypass construction.
18. Few NJ bypass planners have successfully limited access or sprawl along bypasses. Route 92 is touted as a "limited access" highway, but intersects every road it crosses, providing multiple opportunities for sprawling offices and other development. The area around the Hightstown Bypass's intersection with Route 130 was "up-zoned" to strip mall uses even before the bypass was built. The Route 33 Bypass has been so unsuccessful at eliminating the conflict between regional and local trips -- perhaps because of the adjacent mall and racetrack development -- that even more bypasses around Freehold are planned to "solve" the traffic congestion.
19. The Task Force should only recommend projects whose public benefits demonstrably exceed their real and external costs. The Task Force should consider not only those benefits and costs that are linked to those directly affected by a project, but also account for all direct and indirect impacts and take into consideration the total costs to society of implementing a particular project.
20. Projects which increase the capacity of the highway by adding additional through lanes are always expensive and almost always impose negative impacts on the environment and on quality of life which New Jersey residents are not willing to accept.
21. Highway capacity increase projects also become entangled with land-use policy issues. Suburban and rural highway widening projects cause sprawl development and undermine "smart growth" development and divert funding from system preservation needs.
22. To mitigate congestion, New Jersey must redirect its limited resources away from the construction of new highways towards the use of advanced technology such as advanced traffic control and intelligent transportation systems. It should encourage employer-based programs such as staggered work schedules and telecommuting to help congestion and forcefully use all state tools, especially tax

and infrastructure incentives to promote smart growth and improved land-use planning initiatives.

23. The Demand Management Subcommittee's recommendations are useful, but do not go far enough to reduce congestion. Instead of providing commuter incentives, the State should put more disincentives to single occupant vehicle use (SOV) and should eliminate all subsidies for SOV parking at all state funding institutions, including public schools. If ridesharing programs were funded at a fraction of roadway construction projects, they would be more effective. Park and ride facilities should be expanded. All of the subcommittee's recommendations should be implemented and augmented. For example, under-utilized suburban mall parking lots (some losing business to newer big box stores) could be used as park and ride pick up zones for urban bus service which could induce more business use of these areas for shopping, eating, and meeting by commuters.
24. The Land Use and Growth Subcommittee Recommendations are very disappointing given the important link between congestion and land use decisions and are naive. County planning is no better, in some instances worse, than municipal planning in New Jersey. Some counties, such as Camden County, have few if any professional planners on staff to carry out the subcommittee's recommendation that counties approve or disapprove development based on existing infrastructure capacity. Camden County even recently extended its sewer capacity into rural areas to generate more sprawl and its officials lobbied heavily to gain an exit to the Atlantic City Expressway that will open rural land up to more sprawl development.
25. Under current State municipal land use laws, local governments cannot deny subdivision applications or building permits on account of a project's contribution to congestion. This law must be changed to give that power to municipal officials. State law also needs to be strengthened to require municipalities to integrate public transportation facilities (bus shelters, stops, pull over bays, etc.) into all new commercial site development plans. Directing more growth into developed areas will make congestion worse if land use plans fail to encourage mixed development, integrate public transportation, and encourage walking and bicycling. State law should require municipal planning officials to certify that transportation demand management techniques and requirements have been integrated into any approved commercial development.
26. The recommendations of the Traffic Management Subcommittee are excellent and should be implemented as soon as possible. On-peak bridge and highway tolls should be added.