



Department of Transportation, District 4
Attn: Yolanda Rivas
P.O. Box 23660 MS 8B
Oakland, CA 94623-0660

January 19, 2018

Dear Ms. Rivas,

Please accept the following comments on behalf of TransForm regarding the DEIR for the HWY 101 Managed Lanes Project.

TransForm is a nonprofit community development organization with over 20 years of experience building healthy, vibrant and safe neighborhoods in the greater Bay Area and throughout California. We have a successful history of planning transit-oriented development and promoting walkable communities with excellent transportation choices to connect people of all incomes to opportunity, keep California affordable and help solve our climate crisis. Our efforts have helped the region win billions of dollars for transit and affordable housing throughout the region, and our staff is made up of transit and policy professionals, former appointed or elected officials, and we have a long history of working with transit agencies and mobility service providers.

The growing and interrelated transportation, affordability, and climate crises call for our communities and public agencies to set a high bar for new transportation investments. The Highway 101 managed lanes project (HWY 101 MLP) proposed by Caltrans, San Mateo City/County Association of Governments (C/CAG) and the San Mateo County Transportation Authority (SMCTA), offered an opportunity to think big and help address these pressing challenges. Among the project's stated goals are increasing person throughput, encouraging carpooling and transit use, and reducing congestion.

The Draft Environmental Impact Report (DEIR) for the HWY 101 MLP considers a range of alternatives for the highway, including a scenario that didn't widen the highway but instead converted a general purpose lane in each direction to an express lane (as TransForm had initially proposed). The report concludes that the conversion scenario would not meet the project goals, especially as congestion was shown to increase significantly in the General Purpose lanes. We believe that several inputs and assumptions limited this conclusion, but we understand the limits of the current transportation models.

Instead, the "build alternative" is being proposed as the "preferred alternative", to be completed as early as 2024 **at a cost of over \$500 million**, proposing to do two things:

I. Convert seven miles of the existing HOV lane to a managed lane from San Antonio Road (near the border of Palo Alto and Mountain View) to Whipple Avenue in Redwood City. This highway segment would remain at four lanes in each direction.

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2. Add 13 miles of managed lanes north of Whipple Road in Redwood City to I-380 in San Bruno. The “addition” of new lanes would be accomplished primarily by connecting segments of the auxiliary lanes (exit-only lanes) to each other, essentially by continuing them under/through each interchange.

The “new” managed lanes would become HOT-3 (High-Occupancy Toll), meaning carpoolers would need at least 3 people per vehicle instead of the current HOV-2 (High-Occupancy Vehicle). Transform supports this higher occupancy in order for the lanes to be effective.

Project proponents point out the benefits of the HWY 101 MLP, including a 10-20% increase in person throughput along the corridor and double digit increases in carpooling. They also applaud the fact that some negative impacts typically associated with highway widening (such as property acquisition and eminent domain) are avoided by the proposed project on account of careful design by project planners.² There is also substantial reduction in delay in the segments where the highway goes from four lanes to five, e.g., northbound past Whipple and Southbound past I-380.

Shortcomings and Impacts

While the Build Alternative’s benefits are highlighted in the DEIR, there are some major shortcomings as well. Perhaps most alarming is how much delay is expected to occur as a result of induced demand, as can be determined from data in Appendix D of the DEIR:

Figure 1 - Northbound 9:30 AM. San Antonio Rd. to I-380 -- 22.7 miles

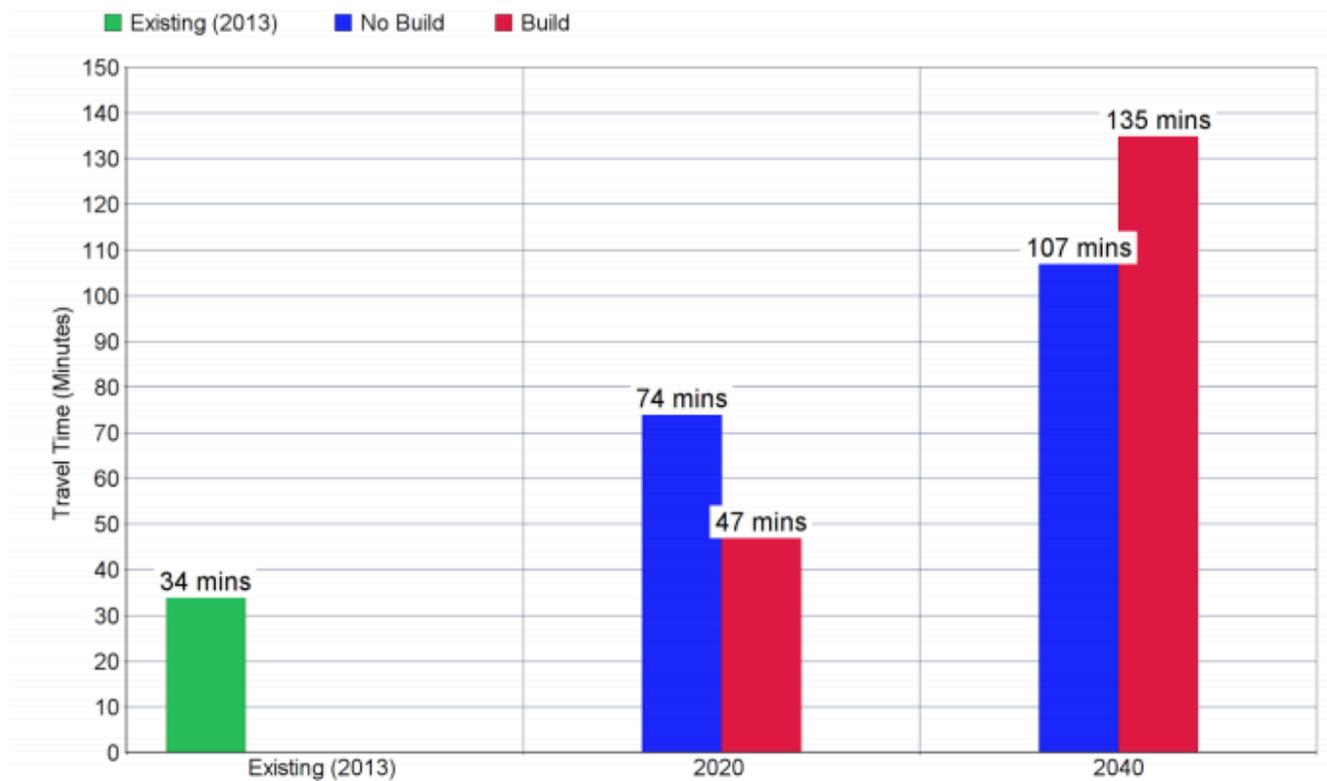


Figure 2 - Northbound 5:30 PM. San Antonio Rd. to I-380 -- 22.7 miles

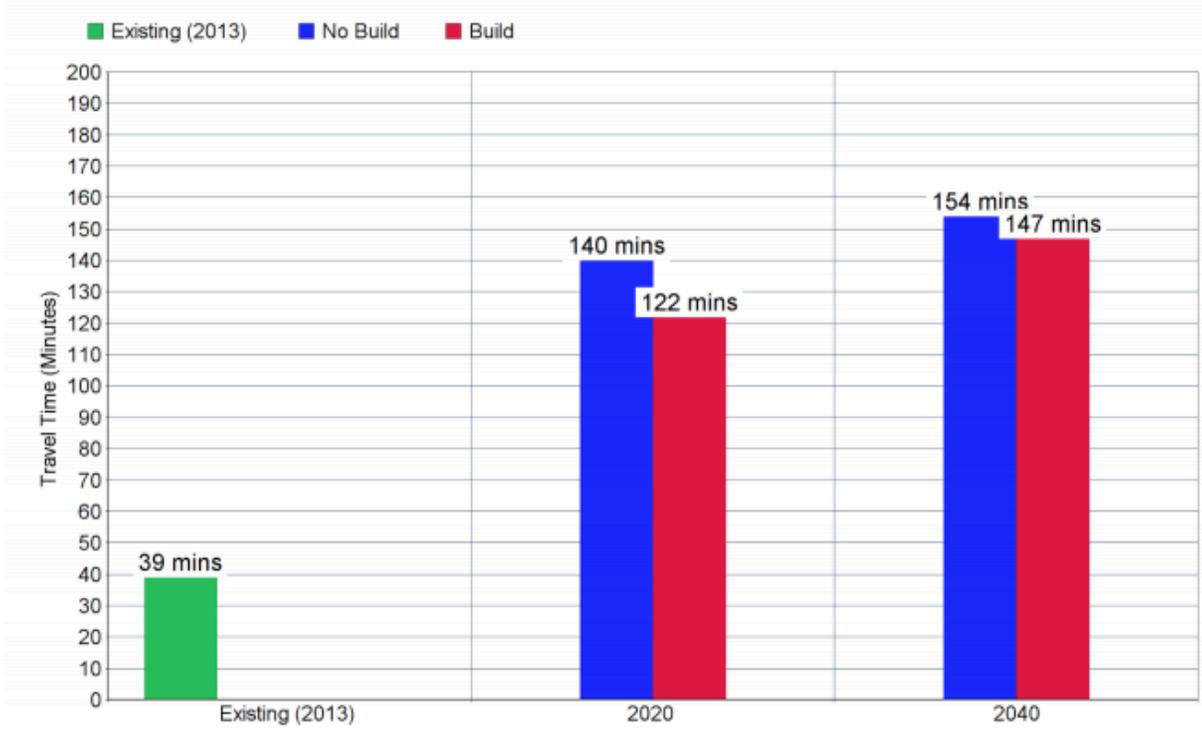


Figure 3 - Southbound 9:30 AM. I-380 to San Antonio Rd -- 23.1 Miles

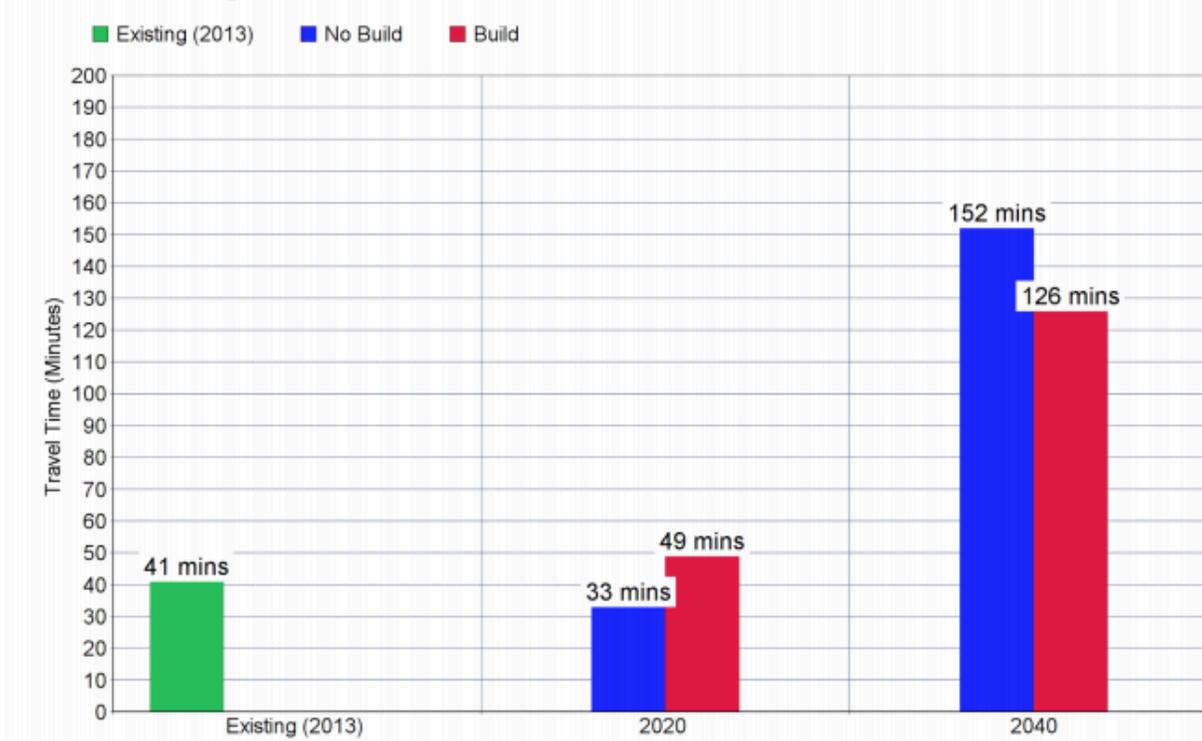


Figure 4 - Southbound 5:30 PM. I-380 to San Antonio Rd -- 23.1 Miles

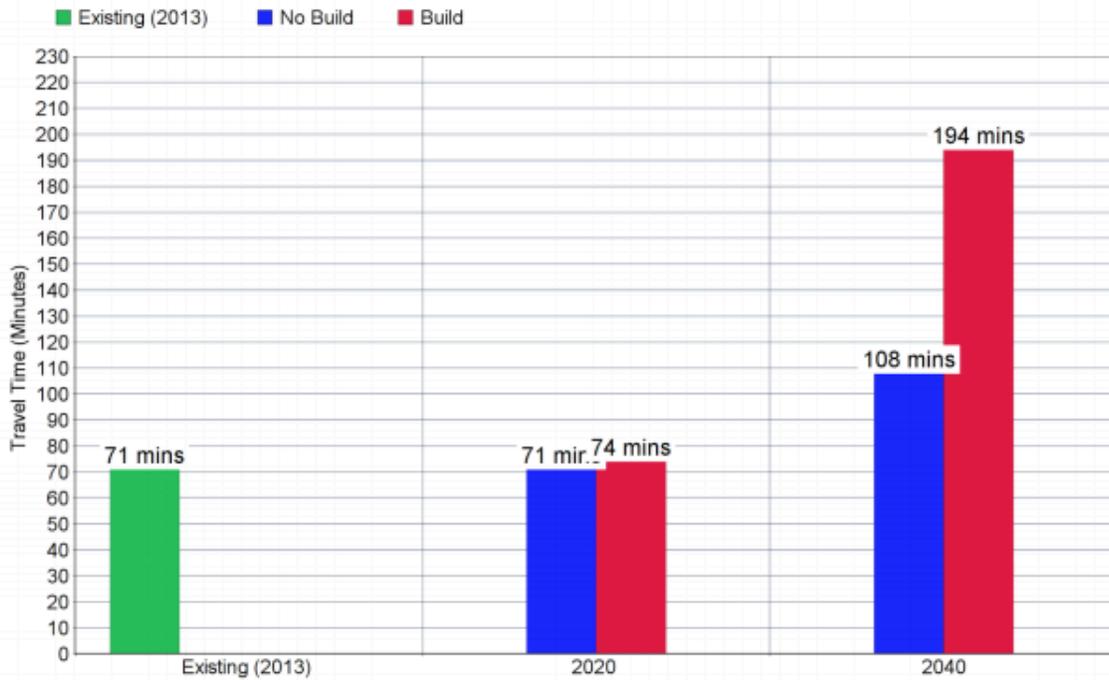
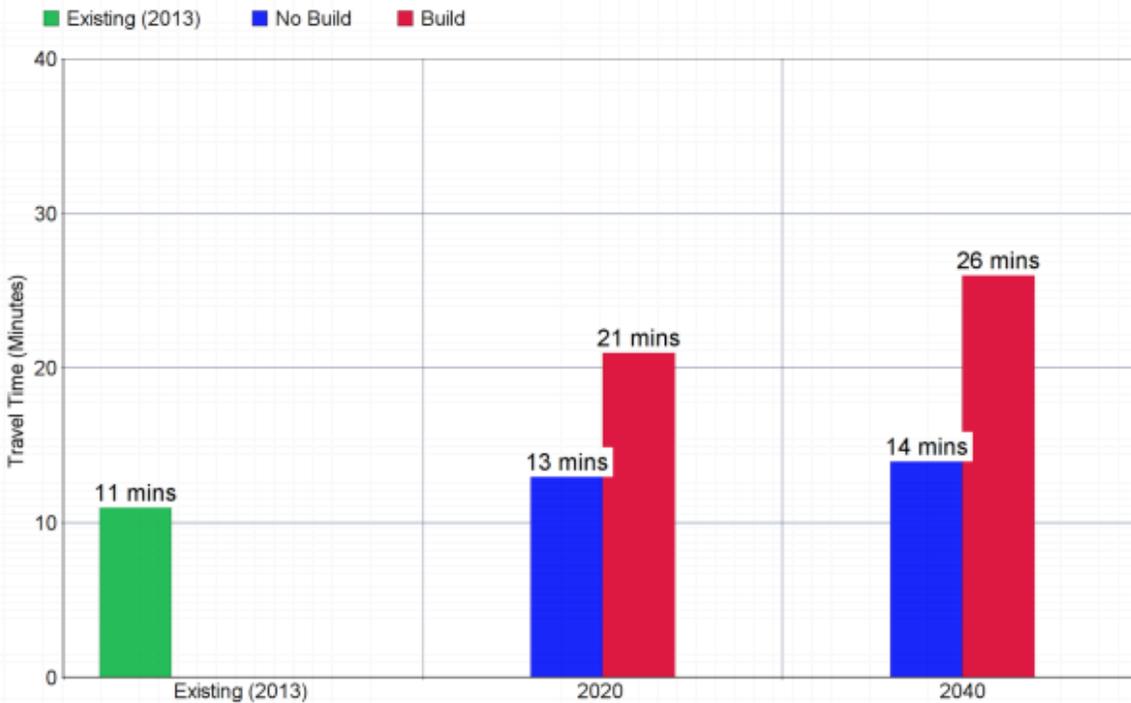


Figure 5 - Northbound 7:30 AM. SR 92 to I-380 Ave -- 5 Miles



The project sponsors have long understood that these delays caused by induced demand mean that this project cannot be the only transportation investment in the corridor — that’s why, for example, we are excited to see that they are supporting an Express Bus study on HWY 101 to compliment the HWY 101 MLP.

The following summary of shortcomings shows how important further investment will be:

1. **Delays and total vehicle travel skyrockets with or without the project.** Given expected employment and population growth, we need a focus on reducing demand and a higher bar for increasing person throughput. Overall daily travel time on the corridor is *currently 59,000 hours*, yet with the Build Alternative travel times would jump to two and a half times existing conditions to *149,700 hours by 2040*. With no project it would be higher still at 158,376 daily hours on Highway 101. Some local streets and I-280 would see higher delays with No Build than with the Build Alternative.
2. **The Build Alternative creates some terrible back-ups.** In segments of the highway where the lanes transition from five lanes to four, travellers will suffer significant delays and, in several situations, be worse off under the Build Alternative. The most alarming projection is southbound at 5:30 pm in the five miles between SR 92 and Whipple Ave. Travel times in general purpose lanes would increase from five minutes in existing (2013) conditions to *16 minutes* in 2040 under the No-Build Alternative, but if the Build Alternative is implemented it will take an astonishing *89 minutes* — **nearly 18 times longer than it takes in existing conditions, or five and a half times the No-Build Alternative** (as shown in Figures 1- 4 above). As would be expected, the build project’s added managed lane does create a tremendous time-savings for transit and carpoolers, compared to no project.
3. **The project increases the number of cars on the highway and overall vehicle travel.** Compared to No Build, the Build Alternative would see a growth of 1.2% in Vehicles Miles Travelled (VMT) expected by 2020 and 1% by 2040. But much more importantly, the DEIR shows that there will be significant growth in VMT by 2040 *compared to current conditions* — either 27 or 28%, with No Build or the Build Alternative. The DEIR does predict a very slight drop in climate emissions by 2040 due to cleaner cars; but by then California is supposed to be well on our way to achieving an 80% reduction in GHGs. In short, no scenario in the DEIR gets us to our climate goals.

What will it take to make Highway 101 work in the near and long term?

With or without the Build Alternative, traffic along the corridor is projected to get much worse. TransForm recommends the following steps to ensure that managed lanes actually deliver benefits for mobility, for our climate, and for low-income commuters struggling with access and high costs of transportation:

1. **Develop a 101 Mobility Action Plan (MAP) and provide significant funding to implement its recommendations.** The MAP would develop a comprehensive set of

strategies to maximize person throughput via mode shift away from solo driving in the managed lane. The focus would be on both short-term and medium-term strategies, including the provision of excellent public transit and vanpool options, carpool programs, new mobility options, as well as publicly funded and employer-driven incentives to greatly increase the use of these modes. Fortunately, Caltrans staff and other agencies also see the need for strategies to support mode shift away from solo driving.

2. **Develop and fund an Equity Strategy to maximize the benefits of the managed lanes for people with lower incomes.** This is especially important given the greater housing and transportation cost-burden of low-income households (especially in San Mateo County), and their greater mobility challenges. The following are a few examples of what an Equity Strategy could include:
 - a. Expansion of affordable new transportation choices for low-income communities and commuters.
 - b. Funding for discounted and free transit passes for people with lower incomes.
 - c. Reduction in the barriers to access the lanes, for example with options for cash payment, free transponders, and reduced tolls for low-income commuters.

In conclusion, as part of a comprehensive, effective way to increase person throughput and the efficiency of the Highway 101 Managed Lanes Project, TransForm proposes that a “101 Mobility Action Plan” and an “Equity Strategy” must be created to compliment the noble goals of the HWY 101 MLP, and funding for the MAP and the Equity Strategy must be made a priority for San Mateo County as a part of the HWY 101 Managed Lane Project going forward, and as part of the expenditure plan for the recently proposed San Mateo County Sales Tax measure.

We thank you for your time and consideration of this proposal, and for accepting this letter as our formal public comment on the DEIR of the HWY 101 MLP.

Sincerely,

A handwritten signature in blue ink that reads "Joel Ramos". The signature is stylized with a large, looping initial "J" and a cursive "Ramos".

Joel Ramos
Regional Planning Director