Appendix I Comments and Responses on the Draft EIR/EA and Recirculated Partial Draft EIR/EA

Introduction

Caltrans filed a Notice of Completion for the Draft EIR/EA with the State Clearinghouse on November 20, 2017. The filing of the Notice of Completion began a public review and comment period that extended from November 20, 2017, to January 19, 2018.

Caltrans filed a Notice of Completion for the Recirculated Partial Draft EIR/EA with the State Clearinghouse on July 10, 2018. The filing of the Notice of Completion began a public review and comment period that extended from July 10, 2018 to August 9, 2018. Additional information about the public review and comment periods is provided in Section 4.1.2.

Responses to Comments

State and local agencies and elected officials, organizations, and members of the public submitted comments. Each comment letter, e-mail, or comment card that was received was reviewed and substantive comments were identified. This appendix presents the public comments and the responses to those comments. Responses to each comment are organized generally as follows and presented in the following sections:

Comments received on the Draft EIR/EA

- State agencies
- Local agencies/Elected officials
- Organizations
- Individuals

Comments received on the Recirculated Partial Draft EIR/EA

- Local agencies/Elected officials
- Organizations
- Individuals

Comments received on the Draft EIR/EA are numbered 1-75. Comments received on the Recirculated Partial Draft EIR/EA are marked with the letter ‘R’ and begin with comment R-76. To locate a comment, comment response, or commenter, see the Table of Contents.

Any text changes resulting from the comments are summarized in the responses and have been incorporated into the text of the EIR/EA. Revisions made after the public review period (November 20, 2017 to January 19, 2018) are indicated by a vertical line in the margin of the EIR/EA text, similar to the one shown to the left of this paragraph.
# Table of Contents

Appendix I Comments and Responses on the Draft EIR/EA and Recirculated Partial Draft EIR/EA ........................................................................................................................................... 1

Introduction ................................................................................................................................. 1

Responses to Comments .............................................................................................................. 1

Comments Received on the Draft EIR/EA ............................................................................... 11

I.1  Comments from State Agencies ...................................................................................... 11

Comment Letter 1: Susan Bransen, California Transportation Commission ......................... 11

Response to Comment Letter 1: Susan Bransen, California Transportation Commission ...... 11

Comment Letter 2: John T. Poultney, Candlestick Point State Recreation Area ..................... 12

Response to Comment Letter 2: John T. Poultney, Candlestick Point State Recreation Area 13

I.2  Comments from Local Agencies/Elected Officials ........................................................ 14

Comment Letter 3: Syed Murtuza, City of Burlingame ............................................................ 14

Response to Comment Letter 3: Syed Murtuza, City of Burlingame ........................................ 16

Comment Letter 4: Hillary Gitelman, City of Palo Alto .......................................................... 18

Response to Comment Letter 4: Hillary Gitelman, City of Palo Alto ...................................... 19

Comment Letter 5: Jarrett Mullen, City of Palo Alto ............................................................... 21

Response to Comment Letter 5: Jarrett Mullen, City of Palo Alto ............................................ 21

Comment Letter 6: Philip Kamhi, City of Palo Alto ................................................................. 22

Response to Comment Letter 6: Philip Kamhi, City of Palo Alto ............................................ 24

Comment Letter 7: Amy Buckmaster, Redwood City/San Mateo County Chamber of Commerce ................................................................................................................................. 27

Response to Comment Letter 7: Amy Buckmaster, Redwood City/San Mateo County Chamber of Commerce ................................................................................................................................. 28

Comment Letter 8: Jessica Manzi, City of Redwood City ......................................................... 29

Response to Comment Letter 8: Jessica Manzi, City of Redwood City ................................... 31

Comment Letter 9: Brad B. Underwood, City of San Mateo ................................................... 35

Response to Comment Letter 9: Brad B. Underwood, City of San Mateo ............................... 37

Comment Letter 10: Roy Molseed, Santa Clara Valley Transportation Authority .................... 39

Response to Comment Letter 10: Roy Molseed, Santa Clara Valley Transportation Authority ................................................................................................................................................. 40

I.3  Comments from Organizations ............................................................................. 42
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 11: Adina Levin, Friends of Caltrain ............................................................. 42
Response to Comment Letter 11: Adina Levin, Friends of Caltrain ........................................ 45
Comment Letter 12: Diane Bailey, Menlo Sparks (1 of 2) ....................................................... 49
Response to Comment Letter 12: Diane Bailey, Menlo Sparks (1 of 2) .................................... 49
Comment Letter 13: Diane Bailey, Menlo Sparks (2 of 2) ....................................................... 50
Response to Comment Letter 13: Diane Bailey, Menlo Sparks (2 of 2) .................................... 51
Comment Letter 14: Rosanne Foust, San Mateo County Economic Development Association (SAMCEDA) ................................................................. 53
Response to Comment Letter 14: Rosanne Foust, San Mateo County Economic Development Association (SAMCEDA) ................................................................. 55
Comment Letter 15: Greg Greenway, Seaport Industrial Association .................................... 56
Response to Comment Letter 15: Greg Greenway, Seaport Industrial Association ............... 56
Comment Letter 16: Gladwyn d’Souza, Sierra Club, Loma Prieta Chapter ............................ 58
Response to Comment Letter 16: Gladwyn d’Souza, Sierra Club, Loma Prieta Chapter ........ 64
Comment Letter 17: Jean McCown, Stanford University ....................................................... 70
Response to Comment Letter 17: Jean McCown, Stanford University ................................. 71
Comment Letter 18: Elaine Breeze, SummerHill Homes ......................................................... 72
Response to Comment Letter 18: Elaine Breeze, SummerHill Homes ................................. 74
Comment Letter 19: Isa Gaillard, TransForm ........................................................................... 77
Response to Comment Letter 19: Isa Gaillard, TransForm .................................................. 78
Comment Letter 20: Joel Ramos, TransForm ........................................................................... 79
Response to Comment Letter 20: Joel Ramos, TransForm .................................................. 85
Comment Letter 21: David Schonbrunn, Transportation Solutions Defense and Education Fund (TRANSDEF) ................................................................. 86
Response to Comment Letter 21: David Schonbrunn, Transportation Solutions Defense and Education Fund (TRANSDEF) ................................................................. 103

1.4 Comments from Individuals ......................................................................................... 118
Comment Letter 22: Larry Abrams ......................................................................................... 118
Response to Comment Letter 22: Larry Abrams .................................................................... 118
Comment Letter 23: Ken Abreu .............................................................................................. 119
Response to Comment Letter 23: Ken Abreu ......................................................................... 119
Comment Letter 24: Kevin Burke (1 of 2) ............................................................................ 120
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Response to Comment Letter 24: Kevin Burke (1 of 2) ................................................................. 120
Comment Letter 25: Kevin Burke (2 of 2) ..................................................................................... 122
Response to Comment Letter 25: Kevin Burke (2 of 2) ................................................................. 122
Comment Letter 26: Michael Chang ............................................................................................ 123
Response to Comment Letter 26: Michael Chang ................................................................. 124
Comment Letter 27: Bradley Cleveland ...................................................................................... 125
Response to Comment Letter 27: Bradley Cleveland ................................................................. 125
Comment Letter 28: Adam Cozzette ......................................................................................... 126
Response to Comment Letter 28: Adam Cozzette ...................................................................... 128
Comment Letter 29: David P. Discher ....................................................................................... 130
Response to Comment Letter 29: David P. Discher .................................................................... 130
Comment Letter 30: Rita Fusaro ............................................................................................... 132
Response to Comment Letter 30: Rita Fusaro ............................................................................ 132
Comment Letter 31: Glenn Gilbert .............................................................................................. 133
Response to Comment Letter 31: Glenn Gilbert ........................................................................ 134
Comment Letter 32: Mark Henderson ....................................................................................... 136
Response to Comment Letter 32: Mark Henderson .................................................................... 137
Comment Letter 33: Laura Hesselgren ....................................................................................... 138
Response to Comment Letter 33: Laura Hesselgren ............................................................... 139
Comment Letter 34: Laurie Hudelson ....................................................................................... 140
Response to Comment Letter 34: Laurie Hudelson .................................................................... 140
Comment Letter 35: Tom Huening ............................................................................................ 142
Response to Comment Letter 35: Tom Huening ........................................................................ 142
Comment Letter 36: Tom Huening ............................................................................................ 143
Response to Comment Letter 36: Tom Huening ........................................................................ 144
Comment Letter 37: Jennifer Pearson Hughes ......................................................................... 145
Response to Comment Letter 37: Jennifer Pearson Hughes ...................................................... 145
Comment Letter 38: Rick Hunter ............................................................................................... 147
Response to Comment Letter 38: Rick Hunter .......................................................................... 147
Comment Letter 39: Ethan Jacobs ............................................................................................ 149
Response to Comment Letter 39: Ethan Jacobs ........................................................................ 149
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 40: Henry Jason (1 of 3) ................................................................. 150
Response to Comment Letter 40: Henry Jason (1 of 3) .............................................. 152
Comment Letter 41: Henry Jason (2 of 3) ................................................................. 153
Response to Comment Letter 41: Henry Jason (2 of 3) .............................................. 153
Comment Letter 42: Henry Jason (3 of 3) ................................................................. 155
Response to Comment Letter 42: Henry Jason (3 of 3) .............................................. 155
Comment Letter 43: Shawn Kann ................................................................. 156
Response to Comment Letter 43: Shawn Kann ...................................................... 156
Comment Letter 44: Jesse D. Kornblum (1 of 2) ...................................................... 157
Response to Comment Letter 44: Jesse D. Kornblum (1 of 2) .............................. 157
Comment Letter 45: Jesse D. Kornblum (2 of 2) ...................................................... 158
Response to Comment Letter 45: Jesse D. Kornblum (2 of 2) .............................. 159
Comment Letter 46: Scott Lane .............................................................................. 160
Response to Comment Letter 46: Scott Lane .......................................................... 161
Comment Letter 47: Oliver Liu ............................................................................... 162
Response to Comment Letter 47: Oliver Liu ............................................................ 162
Comment Letter 48: Peter Loeb .............................................................................. 164
Response to Comment Letter 48: Peter Loeb .......................................................... 164
Comment Letter 49: A Concerned San Mateo Resident (1) .................................... 166
Response to Comment Letter 49: A Concerned San Mateo Resident (1) ............ 166
Comment Letter 50: Terry Nagel ........................................................................... 167
Response to Comment Letter 50: Terry Nagel ....................................................... 167
Comment Letter 51: Zonda Nel (1 of 2) ................................................................. 168
Response to Comment Letter 51: Zonda Nel (1 of 2) .............................................. 168
Comment Letter 52: Zonda Nel (2 of 2) ................................................................. 169
Response to Comment Letter 52: Zonda Nel (2 of 2) .............................................. 169
Comment Letter 53: Tenea Nelson ........................................................................ 170
Response to Comment Letter 53: Tenea Nelson ...................................................... 171
Comment Letter 54: Beth Pawlick ........................................................................ 173
Response to Comment Letter 54: Beth Pawlick ...................................................... 173
Comment Letter 55: Alan Sarver ........................................................................... 174
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Response to Comment Letter 55: Alan Sarver ................................................................. 174
Comment Letter 56: Amy Tang ........................................................................................ 176
Response to Comment Letter 56: Amy Tang ................................................................. 176
Comment Letter 57: Wanda Tormos ........................................................................... 177
Response to Comment Letter 57: Wanda Tormos ....................................................... 177
Comment Letter 58: (Unknown last name), Cindy ....................................................... 178
Response to Comment Letter 58: (Unknown last name), Cindy ....................................... 178
Comment Letter 59: (Unknown last name), Deanna ..................................................... 179
Response to Comment Letter 59: (Unknown last name), Deanna .................................... 179
Comment Letter 60: (Unknown last name), Drew (1 of 13) ......................................... 180
Response to Comment Letter 60: (Unknown last name), Drew (1 of 13) ...................... 180
Comment Letter 61: (Unknown last name), Drew (2 of 13) ......................................... 181
Response to Comment Letter 61: (Unknown last name), Drew (2 of 13) ...................... 181
Comment Letter 62: (Unknown last name), Drew (3 of 13) ......................................... 182
Response to Comment Letter 62: (Unknown last name), Drew (3 of 13) ...................... 182
Comment Letter 63: (Unknown last name), Drew (4 of 13) ......................................... 184
Response to Comment Letter 63: (Unknown last name), Drew (4 of 13) ...................... 184
Comment Letter 64: (Unknown last name), Drew (5 of 13) ......................................... 186
Response to Comment Letter 64: (Unknown last name), Drew (5 of 13) ...................... 186
Comment Letter 65: (Unknown last name), Drew (6 of 13) ......................................... 187
Response to Comment Letter 65: (Unknown last name), Drew (6 of 13) ...................... 187
Comment Letter 66: (Unknown last name), Drew (7 of 13) ......................................... 188
Response to Comment Letter 66: (Unknown last name), Drew (7 of 13) ...................... 188
Comment Letter 67: (Unknown last name), Drew (8 of 13) ......................................... 189
Response to Comment Letter 67: (Unknown last name), Drew (8 of 13) ...................... 189
Comment Letter 68: (Unknown last name), Drew (9 of 13) ......................................... 190
Response to Comment Letter 68: (Unknown last name), Drew (9 of 13) ...................... 190
Comment Letter 69: (Unknown last name), Drew (10 of 13) ...................................... 191
Response to Comment Letter 69: (Unknown last name), Drew (10 of 13) ..................... 191
Comment Letter 70: (Unknown last name), Drew (11 of 13) ...................................... 192
Response to Comment Letter 70: (Unknown last name), Drew (11 of 13) ..................... 193
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 71: (Unknown last name), Drew (12 of 13) ................................................. 194
Response to Comment Letter 71: (Unknown last name), Drew (12 of 13) ......................... 194
Comment Letter 72: (Unknown last name), Drew (13 of 13) ................................................. 195
Response to Comment Letter 72: (Unknown last name), Drew (13 of 13) ......................... 195
Comment Letter 73: Joe Vollert .............................................................................................. 196
Response to Comment Letter 73: Joe Vollert ......................................................................... 197
Comment Letter 74: A Concerned San Mateo Resident (2) ................................................... 198
Response to Comment Letter 74: A Concerned San Mateo Resident (2) ............................... 198
Comment Letter 75: Matt Zientek ........................................................................................... 199
Response to Comment Letter 75: Matt Zientek ...................................................................... 199

Comments Received on the Recirculated Partial Draft EIR/EA.......................................... 200

I.5 Comments from Local Agencies/Elected Officials ........................................................... 200
Comment Letter R76: David J. Canepa, San Mateo County Board of Supervisors ............... 200
Response to Comment Letter R76: David J. Canepa, San Mateo County Board of Supervisors ................................................................. 201
Comment Letter R77: Sam Hindi, City of Foster City ........................................................... 204
Response to Comment Letter R77: Sam Hindi, City of Foster City ....................................... 205
Comment Letter R78: Lenny Siegel, City of Mountain View ................................................ 206
Response to Comment Letter R78: Lenny Siegel, City of Mountain View ............................ 208

I.6 Comments from Organizations......................................................................................... 209
Comment Letter R79: Gladwyn d’Souza, Sierra Club, Loma Prieta Chapter .................... 209
Response to Comment Letter R79: Gladwyn d’Souza, Sierra Club, Loma Prieta Chapter .... 211
Comment Letter R80: Christopher Lepe, TransForm ............................................................. 215
Response to Comment Letter R80: Christopher Lepe, TransForm ......................................... 221
Comment Letter R81: David Schonbrunn, Transportation Solutions Defense and Education Fund (TRANSDEF) ................................................................. 223
Response to Comment Letter R81: David Schonbrunn, Transportation Solutions Defense and Education Fund (TRANSDEF) ................................................................. 227
Comment Letter R82: Victoria Grey, Sunnybrae Neighborhood, City of San Mateo ............ 233
Response to Comment Letter R82: Victoria Grey, Sunnybrae Neighborhood, City of San Mateo ................................................................................................................. 236
Comment Letter R83: Thomas Morgan, Arbor Rose HOA .................................................... 239
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Response to Comment Letter R83: Thomas Morgan, Arbor Rose HOA ............................................ 240

Comment Letter R84: Laurie Watanuki and Michael Weinhauer, Central Neighborhood Association .......................................................................................................................................................... 241

Response to Comment Letter R84: Laurie Watanuki and Michael Weinhauer, Central Neighborhood Association .......................................................................................................................................................... 244

1.7 Comments from Individuals ........................................................................................................... 246

Comment Letter R85: Issac Clerencia ............................................................................................... 246

Response to Comment Letter R85: Issac Clerencia ............................................................................. 246

Comment Letter R86: Randy Cole ....................................................................................................... 247

Response to Comment Letter R86: Randy Cole .................................................................................. 247

Comment Letter R87: Adam Cozzette ............................................................................................... 248

Response to Comment Letter R87: Adam Cozzette ............................................................................. 248

Comment Letter R88: Stuart Hansen (1 of 3) ..................................................................................... 250

Response to Comment Letter R88: Stuart Hansen (1 of 3) .................................................................. 250

Comment Letter R89: Stuart Hansen (2 of 3) ..................................................................................... 251

Response to Comment Letter R89: Stuart Hansen (2 of 3) .................................................................. 251

Comment Letter R90: Stuart Hansen (3 of 3) ..................................................................................... 252

Response to Comment Letter R90: Stuart Hansen (3 of 3) .................................................................. 252

Comment Letter R91: Ch. Jackson ...................................................................................................... 253

Response to Comment Letter R91: Ch. Jackson .................................................................................. 253

Comment Letter R92: Christopher Keane ........................................................................................... 253

Response to Comment Letter R92: Christopher Keane ........................................................................ 253

Comment Letter R93: Donghui Li ........................................................................................................ 254

Response to Comment Letter R93: Donghui Li .................................................................................... 254

Comment Letter R94: Tracy Mallory .................................................................................................... 255

Response to Comment Letter R94: Tracy Mallory .............................................................................. 256

Comment Letter R95: Meredith Ozbil, Jazzercise Menlo Park .............................................................. 260

Response to Comment Letter R95: Meredith Ozbil, Jazzercise Menlo Park .......................................... 260

Comment Letter R96: Hal Plotkin ........................................................................................................... 261

Response to Comment Letter R96: Hal Plotkin .................................................................................... 263

Comment Letter R97: Richard Rathbun ............................................................................................... 264
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Response to Comment Letter R97: Richard Rathbun ............................................................. 265
Comment Letter R98: Mark Rau ......................................................................................... 266
Response to Comment Letter R98: Mark Rau ...................................................................... 271
Comment Letter R99: Marleta Roth ................................................................................... 273
Response to Comment Letter R99: Marleta Roth ............................................................... 273
Comment Letter R100: Katie Talbot .................................................................................. 274
Response to Comment Letter R100: Katie Talbot .................................................................. 274
Comment Letter R101: (Unknown last name), Drew (1 of 9) ................................................ 275
Response to Comment Letter R101: (Unknown last name), Drew (1 of 9) ......................... 275
Comment Letter R102: (Unknown last name), Drew (2 of 9) ................................................ 276
Response to Comment Letter R102: (Unknown last name), Drew (2 of 9) ......................... 277
Comment Letter R103: (Unknown last name), Drew (3 of 9) ................................................ 278
Response to Comment Letter R103: (Unknown last name), Drew (3 of 9) ......................... 278
Comment Letter R104: (Unknown last name), Drew (4 of 9) ................................................ 280
Response to Comment Letter R104: (Unknown last name), Drew (4 of 9) ......................... 281
Comment Letter R105: (Unknown last name), Drew (5 of 9) ................................................ 282
Response to Comment Letter R105: (Unknown last name), Drew (5 of 9) ......................... 282
Comment Letter R106: (Unknown last name), Drew (6 of 9) ................................................ 283
Response to Comment Letter R106: (Unknown last name), Drew (6 of 9) ......................... 283
Comment Letter R107: (Unknown last name), Drew (7 of 9) ................................................ 284
Response to Comment Letter R107: (Unknown last name), Drew (7 of 9) ......................... 285
Comment Letter R108: (Unknown last name), Drew (8 of 9) ................................................ 286
Response to Comment Letter R108: (Unknown last name), Drew (8 of 9) ......................... 286
Comment Letter R109: (Unknown last name), Drew (9 of 9) ................................................ 287
Response to Comment Letter R109: (Unknown last name), Drew (9 of 9) ......................... 287
 Comments Received on the Draft EIR/EA

I.1 Comments from State Agencies

Comment Letter 1: Susan Bransen, California Transportation Commission

January 18, 2018

Ms. Yolanda Rivas
Senior Environmental Planner
California Department of Transportation
111 Grand Avenue
Oakland, CA 94623

RE: Draft Environmental Impact Report / Environmental Assessment for the U.S. Highway 101 Managed Lanes Project

The California Transportation Commission (Commission), as a Responsible Agency, received the Draft Environmental Impact Report/Environmental Assessment prepared by the California Department of Transportation (Caltrans) in cooperation with the San Mateo County Transportation Authority and the City/County Association of Governments of San Mateo County to provide continuous managed lanes in the northbound and southbound directions of U.S. 101 in Santa Clara and San Mateo counties from the terminus of the existing high-occupancy vehicle (HOV) lanes in northern Santa Clara County to north of Interstate-380 (I-380). The total project cost is $534 million and sources of funding have not been fully identified.

The Commission has no comments with respect to the project purpose and need, the alternatives studied, the impacts evaluated, and the evaluation methods used. The Commission should be notified as soon as the environmental process is finalized since project funds cannot be allocated for project design, right of way or construction until the final environmental document is complete. Once the final environmental process is concluded, the Commission will consider the environmental impacts in determining whether to approve the project for future consideration of funding.

Upon completion of the environmental process, please ensure the Commission is notified in writing whether the selected alternative identified in the final environmental document is consistent with
the appropriate Regional Transportation Plan. In the absence of such assurance of consistency, the project may be considered inconsistent and Commission staff will base its recommendations to the Commission on that determination. The Commission may deny funding to a project which is no longer eligible due to scope modifications or other reasons.

The Commission also encourages Caltrans and its partners to ensure early communication with the Commission in the event it is anticipated that the Commission will be requested to provide authorization to develop and operate high-occupancy toll lanes or other toll facilities, including the administration and operation of a value pricing program and exclusive or preferential lane facilities in accordance with California Streets and Highways Code Section 149.7.

If you have any questions, please contact Jose Oseguera, Assistant Deputy Director, at (916) 653-2094.

Sincerely,

/SUSAN BRANSEN
Executive Director

c: Phil Stolarski, Chief (Division of Environmental Analysis), California Department of Transportation

Response to Comment Letter 1: Susan Bransen, California Transportation Commission

1-1

The comment is noted; thank you for this information.
Comment Letter 2: John T. Poultney, Candlestick Point State Recreation Area

From: Poultney, John@Parks <John.Poultney@parks.ca.gov>
Sent: Wednesday, January 24, 2018 9:59 AM
To: SM 101 DEIR EA Comments@DOT
Cc: john_poultney@yahoo.com
Subject: Questions/comments re Managed Lanes Project

Hi Yolanda and CalTrans!

2-1 This is John Poultney; I live in San Mateo near where the Managed Lanes Project is in planning. I have some specific concerns regarding the rebuilding of the Monte Diablo Pedestrian Overcross mentioned in this project. Can you tell me the project manager to whom I would discuss these? This detail has not been addressed very much thus far in the publicly available materials.

2-2 Also I am wondering if there is a possibility to include a NORTHBOUND on ramp from Dore Ave in this project. As of now there is an exit ramp there but it would be great to have an on ramp as well, as there is at Kehoe Ave.

Thank you!
John

John T. Poultney
Candlestick Point State Recreation Area
1150 Carroll Ave (Park Office)
San Francisco, CA 94124
(415) 822-0893
john.poultney@parks.ca.gov

Response to Comment Letter 2: John T. Poultney, Candlestick Point State Recreation Area

2-1 The Final EIR/EA has been updated to reflect refinements in the preliminary project design. The proposed project no longer includes the potential need to make any changes to the Monte Diablo Avenue Pedestrian/Bicycle Overcrossing. Section 1.4.1 has been updated to reflect this change.

The latest construction updates for the proposed project will be available on the project website. Please see http://www.dot.ca.gov/d4/101managedlanes/ for updated information about the project and project construction.

2-2 The commenter's request is noted. The construction on a northbound on-ramp from Dore Avenue would be beyond the scope of the proposed project. However, the project would not preclude this suggestion from being carried out in the future.
I.2 Comments from Local Agencies/Elected Officials

Comment Letter 3: Syed Murtuza, City of Burlingame

The City of Burlingame

PUBLIC WORKS DEPARTMENT
TEL: (650) 558-7230
FAX: (650) 558-3310

CITY HALL: 501 PRIMROSE ROAD
BURLINGAME, CALIFORNIA 94010-3997
www.burlingame.org

CORPORATION YARD
TEL: (650) 558-7670
FAX: (650) 596-1598

January 17, 2018

California Department of Transportation, District 4
Yolanda Rivas, Environmental Branch Chief
Office of Environmental Analysis, Mail Station 8B
111 Grand Avenue
Oakland, CA 94623-0660

Email: yolanda_rivas@dot.ca.gov
m101DEIR_EA_comments@dot.ca.gov

Subject: City of Burlingame Comments to Caltrans in Response to the Draft Environmental Impact Report for the US 101 Managed Lanes Project

Dear Ms. Rivas:

The City of Burlingame would like to take this opportunity to express our appreciation to Caltrans for the opportunity to submit comments in response to the Draft Environmental Impact Report (DEIR) for the US 101 Managed Lanes Project.

The City has reviewed the Draft EIR and would like to submit the following comments:

- The DEIR lacks adequate information regarding detailed impacts resulting from the new acceleration lane and sound wall relocation in the southbound direction for 3,000 feet from the Broadway on-ramp. In order to mitigate the effects of the sound wall encroachment into Rollins Road, there needs to be a minimum landscape area maintained adjacent to the sound wall behind the face of the curb to re-establish ivy/vines on the wall and to provide a buffer between the northbound travel lanes of Rollins Road with the sound wall.

- As a result of the sound wall relocation, the Rollins Road roadway shall maintain a minimum of 11-foot wide travel lanes in both directions, and an 8-foot wide parking lane...
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Ms. Yolanda Rivas
January 17, 2018
Page 2

3-2, cont.

throughout the length of the newly relocated wall. These shall be called out as minimum widths, with any additional roadway width being used towards increasing the landscaped buffer.

3-3

• The architectural features on both sides of the new sound wall shall contain the tree motif features used in the US 101/Broadway Interchange Project, and remain in line with the character of Burlingame. The new sound wall height shall be consistent with the existing wall.

3-4

• The DEIR shows that the project encroaches several feet into Rollins Road for relocating the sound wall; however, it lacks the details of the right-of-way impacts, dimensions, and sections. The project shall provide details of the right-of-way impacts and obtain necessary approval from the City Council.

3-5

• The DEIR plans reflect the old Broadway Interchange and it is not clear how the proposed project affects/impacts the newly constructed Interchange. The project plans shall reflect the newly constructed Interchange, show proposed improvements in reference to the recent improvements, and address any potential impacts.

3-6

• Drainage plans shall be provided to confirm that all freeway drainage (existing and proposed) does not negatively impact the non-freeway drainage from Burlingame. Any necessary storm drainage improvements that become evident as a result of the project shall be corrected and included in the project scope. All existing underground drainage infrastructure crossings under the freeway should be evaluated to confirm adequate structural integrity and addressed as required as part of the project scope.

3-7

• All City owned infrastructure and utilities along Rollins Road shall be protected in place during the project construction. The project shall be responsible to repair damage caused to City facilities as a result of the project construction.

3-8

• Rollins Road along its entire affected length shall be fully resurfaced with new asphalt concrete pavement as approved by the City of Burlingame Public Works Department, as the project construction, including the relocation of the sound wall, is expected to cause significant disruption, result in wear and tear, and damage the roadway.

3-9

• The project shall take adequate measures to minimize construction noise and disruption to Burlingame businesses and residents during construction. This shall include evaluating the cumulative impacts of construction noise occurring in the area that will be exacerbated by this project. Given the unknown noise levels at this time, the project needs to include an active engagement of determining appropriate mitigation measures as the engineering plans go forward.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Ms. Yolanda Rivas
January 17, 2018
Page 3

The City of Burlingame appreciates the opportunity to provide comments in response to the DEIR, and looks forward to working cooperatively with Caltrans to address Burlingame’s concerns as stated in this letter. Please contact Assistant Public Works Director Art Morimoto at amorimoto@burlingame.org for questions regarding the above comments.

Sincerely,

[Signature]

Syed Murtuza
Director of Public Works

Cc: Burlingame City Council
San Mateo County Transportation Authority Board
C/CAG Board

Response to Comment Letter 3: Syed Murtuza, City of Burlingame

3-1

The Final EIR/EA has been updated to reflect refinements in the preliminary project design. No southbound sound walls need now be relocated as part of the proposed project. Sections 2.2.7.3 and 2.2.7.4 have been updated to reflect this change.

3-2

Please see the response to Comment 3-1.

3-3

Please see the response to Comment 3-1.

3-4

Please see the response to Comment 3-1. No sound walls would be relocated in the City of Burlingame as a result of the proposed project.

3-5

The project design accounts for the newly reconstructed Broadway Interchange in Burlingame, and would not impact the facility. Your letter appears to reference Appendix C of the Draft and Final EIR/EA, which contains aerial imagery from the United States Geological Survey dated 2015. This imagery provides a visual context for key aspects of the project and does not reflect the technical specifications used to design the Build Alternative. The project plans for the proposed US 101 Managed Lanes Project will reflect the new interchange at Broadway.
3-6

The comment is noted. Caltrans will provide the City of Burlingame with the project drainage plans as requested during the Plan, Specification, and Estimate (PS&E) phase to confirm that the proposed project will not impact non-freeway facilities.

3-7

Reasonable efforts will be made to protect City-owned infrastructure in place; however, any facilities that may be damaged during project construction that are within the right-of-way of the City would be repaired to existing conditions or replaced in-kind.

3-8

During project construction, any pavement that may be damaged or affected by the project would be repaved to existing conditions or replaced in-kind.

3-9

The comment is noted. As noted in Section 2.2.7.4, the project would incorporate short-term construction noise minimization measures to reduce the potential for noise impacts. Please see minimization measures NOI-1 through NOI-10 for details.
Comment Letter 4: Hillary Gitelman, City of Palo Alto

December 14, 2017

California Department of Transportation
Office of Environmental Analysis
ATTN: Yolanda Rivas, District Branch Chief
P.O. BOX 23660, Oakland, CA 94623

Subject: Request Extension to U.S. Highway 101 Managed Lanes Project DEIR Comment Period

Dear Ms. Rivas,

Please extend the Draft Environmental Impact Report (DEIR) comment period for the U.S. Highway 101 Managed Lanes Project. Since a number of trips on the U.S. 101 corridor originate from and destined to Palo Alto, the city is requesting additional time to analyze potential impacts from this major project of regional significance, a portion of which impacts the City of Palo Alto and will affect the city's local transportation network. The city also notes the following specific evidence which justifies extension of the comment period:

- Following the publication notification of the DEIR, city staff attempted to access the DEIR from the project webpage on November 17, 2017, but it was unavailable or difficult to locate. Staff also attempted to sign up for the project notifications, but the link was broken. Following these difficulties, staff e-mailed the project team requesting the DEIR and identifying these specific communication difficulties. No response from Caltrans staff was received.
- The comment period overlap with two major holiday periods, effectively limiting the number of working days the city has to review the DEIR.
- City staff attended a scoping meeting and provided an e-mail address for future notifications. No notifications were received.
- Written notification was not received by mail until December 6, 2017, greatly limiting the number of working days staff has to review the DEIR.

Thank you for your consideration. We look forward to submitting comments on the project.

Regards,

Hillary Gitelman
Director, Department of Planning & Community Environment
Response to Comment Letter 4: Hillary Gitelman, City of Palo Alto

4-1

Caltrans responded to the City of Palo Alto on December 20, 2017 to address this comment. Please see the response letter from Caltrans below:

December 20, 2017

Ms. Hillary Gitelman
Director, Department of Planning & Community Environment
250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301

Dear Ms. Gitelman:

Thank you for your letter of December 14, 2017, to the California Department of Transportation (Caltrans), regarding the U.S. Highway 101 Managed Lanes Project (Project) Draft Environmental Impact Report/Environmental Assessment (DEIR/EA). In your letter you request that Caltrans extend the public comment period for the DEIR/EA based upon various reasons. This letter will respond to each of your points below.

Following notification, city staff attempted to access the DEIR/EA from the project webpage on 11/17/17 but it was unavailable or difficult to locate. Also, on 11/17/17, City of Palo Alto staff attempted to sign up for project notifications but the link was broken. Your letter also notes a lack of response in a subsequent email request to project staff Jeffrey Weiss@dot.ca.gov. We have discovered that there was a typographical error in the email address, which has since been corrected.

In reviewing Project communications, we have learned that on November 14, Caltrans representatives sent out information about the upcoming public meetings on December 6 and December 11, which prematurely indicated that the Project DEIR/EA was available on the Project website at http://www.dot.ca.gov/d4/101managedlanes. Caltrans posted the document on the Project website on November 20, which initiated the public comment period.

Although City of Palo Alto staff requested email notification, we recognize a failure to notify City of Palo Alto when the document was available until December 6, 2017, when you received the letter directing you to the project website and information about the public meetings. Caltrans also published a Notice of Availability (NOA) and public meetings announcement on 11/30/17 in the San Mateo Daily Journal, San Francisco Chronicle, and the peninsula and city version of the San Jose Mercury News.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
Ms. Hillary Gitelman  
December 20, 2017  
Page 2

I sincerely apologize for the premature communication and failure to email you directly; however, Caltrans is exceeding the 45-day public circulation requirement under CEQA with the timely availability of the DEIR/EA on 11/20/17 and the NOA on 11/30/17. Caltrans set the deadline for comments in consideration of the two holidays.

Caltrans is announcing a third public meeting for which a notice will be published soon as follows:

January 11, 2018,  
450 Poplar Avenue  
Millbrae, CA  
6-8 pm.

I am happy to schedule a meeting between your staff and members of the Project Development team separately to facilitate your review of the DEIR/EA. I will contact you in early January to schedule a date and time in the District office.

I sincerely appreciate your alerting us to the early communication issues. We will use this information to improve our notification process in the future. In the meantime, please send your comments by January 19, 2018, to:

Caltrans District 4  
Office of Environmental Analysis  
Attn: Yolanda Rivas, District Branch Chief  
P.O. Box 23660, Oakland, CA 94623

You can also comment via email to: sm101DEIR_EA_comments@dot.ca.gov

Sincerely,

Yolanda Rivas  
District Branch Chief  
Division of Environmental Planning & Engineering

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
Comment Letter 5: Jarrett Mullen, City of Palo Alto

From: Mullen, Jarrett <Jarrett.Mullen@CityofPaloAlto.org>
Sent: Friday, November 17, 2017 11:41 AM
To: SM 101 DEIR/EA Comments@DOT
Subject: DEIR Unavailable Online & Please Fix Project Webpage

Hello,

I'm writing with a request that the project webpage be fixed so broken links work and the mailing list sign up functionality is restored. I'm disappointed that information for such a large and critical project which is entering a major environmental and public review phase is unavailable or very difficult to locate. I have observed the following issues:

1) The mailing list "sign up" link on the project page doesn't work: it links to an individual's e-mail and when an e-mail is sent to that address, it bounces.

2) The project webpage link on the DEIR meeting flyers is incorrect and broken. It's missing "gov" from the address and may have other issues.

3) The DEIR is not easily found on the project webpage. Could you please send me a link to the copy of the DEIR for review? The meeting flyer states "The DEIR/EA is available for review online at: www.dot.ca.gov/d4/101managedlanes" but no such link or announcement for the file is on that page.

Please let me know when the issues are fixed, and most importantly where an electronic copy of the DEIR can be found for download and review.

Regards,

Jarrett Mullen | Transportation Planner
Planning & Community Environment – Transportation
250 Hamilton Avenue | Palo Alto, CA 94301
Tel: 650.325.2218 E: Jarrett.mullen@cityofpaloalto.org

Please think of the environment before printing this email – Thank you.

Response to Comment Letter 5: Jarrett Mullen, City of Palo Alto

5-1

Caltrans responded to the City of Palo Alto on December 20, 2017 with information that addresses these concerns. Please see the response to Comment 4-1.
Comment Letter 6: Philip Kamhi, City of Palo Alto

January 19, 2018

Caltrans District 4
Office of Environmental Analysis
ATTN: Yolanda Rivas, District Branch Chief
P.O. Box 23660, Oakland, CA 94623

Subject: City of Palo Alto Comments on U.S. Highway 101 Managed Lanes Project Draft Environmental Impact Report/Environmental Assessment

Dear Branch Chief Rivas,

On behalf of Director Hillary Gitelman, I am pleased to offer comments on the U.S. Highway 101 Managed Lanes Project Draft EIR/EA. As the representative of a major employment center in the San Francisco Bay Area which contributes to regional travel demand, I have the following feedback on the DEIR. Some relevant policies from our adopted Comprehensive Plan are listed below and within each comment for reference:

- Policy T-1.1: Take a comprehensive approach to reducing single-occupant vehicle trips by involving those who live, work, and shop in Palo Alto in developing strategies that make it easier and more convenient not to drive.
- Policy T-1.3: Reduce GHG and pollutant emissions associated with transportation by reducing VMT and per-mile emissions through increasing transit options, supporting biking and walking, and the use of zero-emission vehicle technologies to meet City and State goals for GHG reductions by 2030.
- Policy T-1.26: Collaborate with adjacent communities to ensure that Palo Alto and its immediate neighbors receive their fair share of regional transportation funds, proportional to the need and demand for transportation improvements within these communities to address region-wide transportation issues.
- Policy T-3.3: Avoid major increases in single-occupant vehicle capacity when constructing or modifying roadways unless needed to remedy severe congestion or critical neighborhood traffic problems. Where capacity is increased, balance the needs of motor vehicles with those of pedestrians and bicyclists.
- Policy T-8.1: Engage in regional transportation planning to reduce congestion and reduce single-occupant vehicle trips, and advocate for specific transit improvements and investments, such as Caltrain service enhancements and grade separations, Dumbarton Express service, enhanced...
bus service on El Camino Real with queue jumping and curbside platforms, HOV/HOT lanes and additional VTA bus service.

- Program T8.3.1: Continue to participate in regional efforts to develop technological solutions that make alternatives to the automobile more convenient Policy T-8.8: Where appropriate, support the conversion of existing traffic lanes to exclusive bus and HOV lanes or Express/HOT lanes on freeways and expressways, including the Dumbarton Bridge, and the continuation of an HOV lane from Redwood City to San Francisco.
- Policy T-8.6: Advocate for efforts by Caltrans and the Valley Transportation Authority to reduce congestion and improve traffic flow on existing freeway facilities consistent with Statewide GHG emissions reduction initiatives.

Alternatives

I am concerned that the DEIR did not formally study a reasonable range of alternatives, including the proposed “HOT3+ Convert a Lane Option (Alternative 3).” Information from which would be helpful in understanding detailed impacts, and potential benefits, to regional mobility within the study corridor.

Elimination of the “HOT 3+ Convert a Lane Option (Alternative 3)”

I am interested in additional information on issues raised to justify rejection of the “HOT 3+ Convert a Lane Option (Alternative 3).”

Effectiveness in Reducing Congestion: DEIR Section 1.4.5.3 notes this alternative would not meet project goals in part because motor traffic shifts to parallel routes and reliability decreases due to congestion. However, it’s unclear during which study year (2020 or 2040) this occurs and how it compares to the preferred alternative in both study years. The preferred alternative shows major congestion within the general purpose lanes in 2040, which would likely lead to similar outcomes and potentially have similar conflicts with the project goals. A formal travel time analysis of Alternative 3, presented side-by-side with the Build Alternative for 2020 and 2040 in both directions is requested to compare both alternatives.

Legislation: DEIR Section 1.4.5.3 notes Section 129 of the title 23 United States Code prohibits conversion of a general purpose lane to an express lane. As noted above, City of Palo Alto policy expresses the city’s interest in potentially converting an existing general purpose lane to HOV/HOT lanes. Accordingly, please note which section of the Moving Ahead for Progress in the 21st Century Act (MAP-21) prohibits converting an existing general purpose lane to an express lane. Please note which subsection within Section 129 of the Title 23 United States Code pertains the interpretation noted in the DEIR.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Response to Comment Letter 6: Philip Kamhi, City of Palo Alto

6-1

The policies noted in this comment (except for Policy T-1.26) from the Palo Alto Comprehensive Plan have been added to Section 2.1.2.1 and Table 2.1.2-1. Policy T-1.26 is focused on actions to be taken by the City of Palo Alto and therefore, is beyond the scope of this environmental document. Caltrans is committed to coordinating with all local jurisdictions within the project corridor.

6-2

In order to provide additional information about the alternative development process and the basis for eliminating the HOT 3+ Convert a Lane Alternative (Alternative 3) from further discussion, this section was recirculated as part of the Recirculated Partial Draft EIR/EA. As described in Section 1.4.6, eight operational alternatives and a reversible lane alternative were considered at the start of the project approval and environmental document (PA&ED) phase.

An initial screening for 2020 conditions was performed for the eight operational alternatives using C/CAG-VTA travel demand model forecast data. Based on the results of the initial screening, an operational analysis was conducted for Alternative 3, for 2020. The analysis results for Alternatives 1 (No Build Alternative), 2 (HOV 2+ - Add a Lane Option), 3 (HOT 3+ - Convert a Lane Option), and 4 (the Build Alternative) from this preliminary investigation have been added as Appendix H of the EIR/EA.
As shown in Appendix H (Figure ES-1), Alternative 3 had even higher travel times compared to the Build and No Build Alternatives for all hours of the AM and PM peak in both the northbound and southbound directions in the general purpose and express lanes (except for two hours which were the same as the Build Alternative). A higher travel time means there is more congestion and slower speeds. For example, as calculated by comparing Tables 13, 14, and 15 to Tables 19, 20, and 21 in Appendix H, the AM peak northbound, AM peak southbound, and PM peak northbound travel times were 2.5 times higher in the general purpose lanes under Alternative 3 than the Build Alternative and travel times in the express lanes were nearly double. Comparing Alternative 3 to the No Build Alternative also showed consistently higher (slower) travel times for Alternative 3.

For Alternative 3, the higher travel times are due to the conversion of a general purpose lane to an express lane on US 101 in both directions from the Whipple Avenue Interchange to the I-380 Interchange. This results in a reduction in the number of general purpose lanes in the northern section of the project area. Under Alternative 3, the general purpose lane queues in the northbound and southbound directions are longer than in the No Build Alternative and the Build Alternative. Under Alternative 3, the congestion in the general purpose lanes would cause more delay for the express lane users entering and exiting the express lanes. As a direct impact, the express lane users would not experience travel time savings as compared to the Build Alternative. Therefore, in spite of providing an express lane (by converting an existing general purpose lane), Alternative 3 would not encourage the use of carpools and transit because of the higher level of delays with this alternative.

The traffic operational analysis was completed for Alternatives 1, 2, 3, and 4 for the study year of 2020. For 2040, the analysis considered only Alternatives 1 and 4 because the results for the year 2020 showed substantially higher (slower) travel times for Alternatives 2 and 3 because of increased delays. By 2040, growth in traffic would further increase the delays for all alternatives, but especially for Alternative 3 as it would have the most limited capacity of any of the alternatives evaluated, even when considering an increase in mode shift from SOVs to buses and carpools.

The project development team reviewed the results of the traffic analysis and determined that Alternative 3 did not meet the purpose and need. Therefore, it was eliminated from further discussion in the Traffic Operations Analysis Report (TOAR) and EIR/EA.

According to the "Federal Tolling Programs under the Moving Ahead for Progress in the 21st Century Act" Memorandum on the FHWA website, Section 1512(a) of MAP-21 provides a complete replacement for the statutory language of 23 U.S.C. 129(a). It states, "Tolling of newly constructed lanes added to existing toll-free Interstate highways is now permitted under Section 129(a)(1)(B) so long as the facility has the same number of toll-free lanes after construction as it did before (excluding HOV lanes and auxiliary lanes) (this authority was previously available under the Express Lanes Demonstration Program, Section 1604(b) of SAFETEA-LU)" (retrieved from https://www.fhwa.dot.gov/map21/guidance/guidetoll.cfm). Section 1.4.6.3 of the Final EIR/EA has been edited to include reference to the section of MAP-21 and subsection within Section 129 of the Title 23 United States Code as requested by the comment.
The Build Alternative has been designed to accommodate more of the existing and future planned traffic than the No Build Alternative. Vehicle miles traveled (VMT) and person throughput are both anticipated to increase as a result of the proposed project. The increased capacity from the proposed express lanes is anticipated to encourage two behavioral changes.

The first is to encourage carpooling and transit use in the corridor. This is the main contributing factor for the increase in person throughput. As described in Section 2.1.8.3, person throughput is anticipated to be 8 to 20 percent higher for the Build Alternative than the No Build Alternative in 2020 and 5 to 15 percent higher in 2040. In addition, person throughput from HOVs would be 27 to 61 percent higher in 2020 and 35 to 58 percent higher in 2040 than with the No Build Alternative. The proposed project and the travel time reliability of the express lanes would provide an incentive for travelers to shift to carpooling and transit use.

The second behavior change that the proposed project would encourage is a route shift away from parallel routes such as SR 82 (El Camino Real) and I-280 onto US 101. The extra capacity from the express lane would encourage existing and future travelers to use US 101 instead of the parallel routes. This is projected to result in higher traffic volumes for US 101 and corresponding lower volumes for the parallel routes. In addition, with the Build Alternative, traffic would shift toward US 101 and away from more circuitous routes that travelers use to avoid congestion on US 101.

With regard to VMT, Caltrans has not adopted any VMT significance thresholds. Projects that add any capacity to the freeway are expected to increase VMT. The proposed project increases VMT slightly while providing a much larger increase in person throughput. Therefore, the capacity that is being proposed would encourage a more efficient use of the existing freeway facility, and away from less efficient routes on local streets or longer alternative routes such as I-280.

The proposed express lanes would be open access lanes where vehicles may choose to enter or exit the lane at any point along the corridor.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 7: Amy Buckmaster, Redwood City/San Mateo County Chamber of Commerce

January 16, 2018

Bijan Sartipi
District 4 Director
California Department of Transportation
111 Grand Avenue
Oakland, CA 94612

VIA EMAIL: SM101DEIR_EA_comments@dot.ca.gov

Dear Mr. Sartipi:

The Redwood City/San Mateo County Chamber of Commerce strongly supports the build alternative proposed in the Draft Environmental Impact Report/Environmental Assessment for the SM 101 Managed Lanes Project.

The addition of express lanes on US 101 in San Mateo County is critical for our local and regional economy and to support other planned improvements on this corridor at the 101/SR 84 interchange and the 101/SR 92 interchange. Managed lanes make sense on this corridor and will also provide the following benefits on the US 101 corridor in San Mateo County:

- Encourage carpooling and transit use
- Provide managed lanes for travel-time reliability
- Increase person throughput
- Apply technology and/or design features to help manage traffic
- Reduce congestion in the corridor
- Minimize operational degradation of the general-purpose lanes

The City of Redwood City is home to major employers such as Oracle, Electronic Arts, Box, Stanford University, Stanford Hospitals and Clinics, Kaiser Hospital, Sequoia Hospital, the County of San Mateo, Canada College, and a major trade hub at our Port of Redwood City.

Please approve the DEIR/EA and move this important project into the construction phase.

Sincerely,

Amy Buckmaster
President and CEO
Redwood City/San Mateo County Chamber of Commerce

1450 Veterans Boulevard • Suite 125 • Redwood City, California 94063 • 650.364.1722 • Fax 650.364.1729
www.redwoodcitychamber.com • amy@redwoodcitychamber.com
@rcsmcchamber
Response to Comment Letter 7: Amy Buckmaster, Redwood City/San Mateo County Chamber of Commerce

The commenter’s support of the project is noted.
Comment Letter 8: Jessica Manzi, City of Redwood City

January 19, 2018

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

Re: Draft Environmental Impact Report (EIR)/Environmental Assessment (EA) for the San Mateo County Highway 101 Managed Lanes Project

Dear Ms. Rivas,

Thank you for the opportunity to comment on the draft EIR/EA for the proposed 101 Managed Lanes Project. We understand and support the purpose and need for the project – to improve travel time reliability, to increase person throughput, and to use technology to manage traffic.

The following is our list of comments and questions on the draft document:

1. Page 1-18 Please clarify the project’s proposed changes for each of the bulleted locations within in the lists, that is to say – identify if the auxiliary lane (or deceleration lane) be maintained, added or replaced for each location.

2. Page 1-21 References “the agencies listed above” in discussion about the Transportation Management Plan. It is not clear where these agencies are listed, please clarify and ensure that the City of Redwood City is included in these discussions.

3. Page 2-23 Please list what significance criteria were used to identify traffic impacts for the purpose of the analysis.

4. Page 2-24 Traffic Operations Analysis Please include a discussion of how the removal of auxiliary and/or acceleration/deceleration lanes will affect the safety of the corridor.

5. Page 2-30 2020 AM Peak Period Travel Speeds and Time – in the description of southbound performance, it is not clear if the results are being consistently compared to the No Build alternative or to the relative performance at different times for the segment from SR 92 Interchange to the Whipple Avenue Interchange.

6. Page 2-35 Effect Summary outlines how the Project meets the purpose and need on Highway 101 and plans to address deficiencies that may arise on Highway 101. Although time of day pricing is identified as a means to alleviate congestion in the managed lanes, it is not clear from the presented analysis to what extent the pricing will reduce or eliminate the identified bottlenecks. It also does not describe the effects of the Project on local intersections or propose any measures to mitigate impacts generated by the Project on local streets. According to Redwood City’s significance criteria, that project would generate an impact in the 2040 Design Year at the intersection of Veterans Boulevard/Whipple Avenue.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

8-8
7. Page 2-185 Resource Areas with No Contribution to Cumulative Effects Traffic and Transportation/Pedestrian and Bicycle Facilities (2.1.8) is missing from this list and/or section. Are there any cumulative effects?

8-9
8. Page 3-15 Transportation/Traffic
   a. The increase in delay (5 seconds) at Veterans/Whipple with the Build Alternative, as compared to the No Build Alternative, in Design Year 2040 appears to conflict with the City of Redwood City’s traffic impact criteria which identifies impacts as significant if the project or project plus cumulative development would cause the average delay at a signalized intersection operating an unacceptable level (LOS E or F) of service to increase by five or more seconds.

8-10
b. Please also identify whether the Project could result in negative safety outcomes for pedestrians and bicyclists at studied intersections within Redwood City; such as those that could be caused by additional queuing or an increase in turning-vehicle volumes through uncontrolled crossings.

8-11
c. The analysis clearly identifies where (and when) the Project will perform worse than the No Build alternative. Include a range of minimization efforts (beyond the use of pricing) that the Project may employ to normalize the geographically disparate effects benefits of the Project. These might include using tolling revenues to offset transit costs and/or increase carpooling in communities where delays are highest. Revenue generated by the project should target the Project’s deficiencies – whether they be transportation related, or related to the environmental effects of the project (such as increased noise levels).

8-12
9. Appendix C Major Project Features Please add the meaning of the magenta and green lines to the legend as well as a key that explains the meaning of the associated numbers.

Thank you again for the opportunity to comment on this project. The City looks forward to continued collaboration with Caltrans, the San Mateo County Transportation Authority, and the San Mateo County City/County Association of Governments as this project progresses. If the Project continues to design, we look forward to collaborating on:

8-13
• the design to ensure its compatibility with the 101/84 Interchange Project and other utilities in the project area,
• the effects of the Project on sensitive noise receptors in Redwood City, and
• the policies developed to minimize the effects of the Project.

If you have any question regarding the City’s comments provided herein, please feel free to contact me directly.

Sincerely,

Jessica Manzi, PE
Senior Transportation Coordinator, City of Redwood City

cc. Aaron Akmin, Assistant City Manager/Community Development Director
   Saber Sarwary, City Engineer
Response to Comment Letter 8: Jessica Manzi, City of Redwood City

8-1
The commenter's support for the purpose and need of the project is noted.

8-2
Each bulleted location has been edited to show if the auxiliary lane would be added or replaced.

8-3
The discussion on the Transportation Management Plan (TMP) has been revised as follows: "The TMP will include outreach to inform the affected jurisdictions, agencies, and public of the times and locations of upcoming construction, construction signs in and approaching the project area, and incident management for traffic control in the vicinity of construction activities." The City of Redwood City would be included in this outreach.

8-4
The comment asks for the significance criteria used in Section 2.1.8 of the EIR/EA. Under NEPA, significance is a function of both context and intensity (40 Code of Federal Regulations [CFR] 1508.27) and does not include criteria that are specific to traffic impacts.

CEQA does not establish specific criteria for significance but rather states that "the determination... calls for careful judgment on the part of the public agency involved" and that "an ironclad definition of significant effect is not possible because the significance of an activity may vary with the setting" (CEQA Guidelines Section 15064[b]).

Section 2.1.8 of the EIR/EA describes several metrics to evaluate the performance of the Build Alternative compared to the No Build Alternative. The metrics include vehicle hours of delay (VHD), travel times, levels of service (LOS) for ramp intersections, and person throughput. These metrics were evaluated as the significance criteria for transportation/traffic.

In order to determine significance, the Build Alternative was compared to the No Build Alternative under each metric for the 2020 and 2040 analysis years in the AM and PM time periods in the northbound and southbound directions (as described in Chapter 3, under the CEQA checklist for Transportation/Traffic). These metrics were assessed for each direction and period to evaluate whether the Build Alternative would result in overall impacts to traffic on US 101 and ramp intersections compared to the No Build Alternative.

As described in Section 2.1.8, the Build Alternative would generally reduce travel times, improve or maintain LOS at most ramp intersections, and increase person throughput compared to the No Build Alternative. While the Build Alternative would not perform better than the No Build Alternative for all metrics during all time periods/directions, it would not result in a significant impact on transportation/traffic.

8-5
The project proposes to remove the following auxiliary lanes in Redwood City: Woodside Road on-ramp to Whipple Avenue off-ramp in the northbound direction, and westbound/eastbound Whipple Avenue on-ramp to Woodside Road off-ramp in the southbound direction. The locations of removed auxiliary lanes would continue to conform to standard merge lengths and
geometries as specified in the Caltrans Highway Design Manual and maintain safety in the corridor.

8-6

This section is comparing the Build Alternative to the No Build Alternative and has been clarified accordingly.

8-7

This comment has two parts, the first to what extent congestion based pricing will reduce or eliminate identified bottlenecks, and second what are the effects of the project on local intersections and any associated measures to mitigate those effects.

Congestion pricing would be used to reduce bottlenecks, and that benefit would be primarily realized in the managed lane which can be used by carpools and buses, and by SOVs paying a toll. Pricing would be used to regulate the number of SOVs using the lane, and under the most congested conditions there may be periods of time that only carpools and buses are allowed in the lanes in order to maintain a minimum average travel speed of 45 mph, as described in Section 1.4.1.2. The 45 mph minimum speed would effectively eliminate bottleneck conditions in the managed lanes. The general purpose lanes would continue to be unrestricted as they are under existing conditions and the No Build Alternative, open to all travelers and no toll would be charged. The proposed project would not eliminate all existing bottlenecks in the non-managed lanes, but it would provide improvement in travel time compared to the No Build Alternative in all directions with the exception of the southbound direction in 2040 in the evening peak period, due to congestion that would increase from Rengstorff Avenue north into the project limits.

An evaluation of intersections along the corridor was included in the traffic analysis. Discussion is provided in Section 2.1.8.3, and intersection levels of service are listed in Appendix D (Table D-9 for existing conditions and in Tables D-10 and D-11 for the Build and No Build Alternatives for 2020 and 2040). These tables show the majority of intersections improving with the proposed project, some substantially, and no intersections drop below LOS E or F that are not already at that operating condition. These were therefore not identified as significant impacts in the EIR/EA.

8-8

The proposed project would not have any cumulative effects regarding Transportation/Pedestrian and Bicycle Facilities (Section 2.1.8). The resource area was added to the list of Section 2.4.3.

8-9

The Veterans Boulevard/Whipple Avenue intersection serves as an important linkage between SR-82 (El Camino Real) and US 101. As noted in Table D-10 and D-11 in Appendix D, the intersection is anticipated to operate at LOS F with the No Build Alternative and LOS E with the Build Alternative in the PM peak hour for 2020. The increase in delay is 2 seconds in the PM period, and delay improves slightly (less delay) in the AM period under the Build Alternative. In 2040, the intersection is anticipated to operate at LOS F with both the Build and No Build Alternatives in the PM peak hour. With the Build Alternative, the delay would increase by 5 seconds in the PM period, and improve by almost 1 second in the AM period. The Build
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

US 101 Managed Lanes Project  I-33  October 2018

Alternative contributes only 5 percent of the traffic delay at this location in 2040. The other 95 percent of the delay is due to planned projected developments (as captured in the C/CAG-VTA travel demand model updated with Plan Bay Area 2015 data) unrelated to the proposed project. The comment states that this conflicts with the City’s traffic impact criteria. This criterion is not presented in the City’s general plan or other publicly available documents reviewed for the proposed project as documented in Section 2.1.2.1. Please see the response to Comment 8-4 regarding the significance criteria used for the proposed project.

Some local intersections in the project study area, including the Veterans Boulevard/Whipple Avenue intersection, would have slightly higher delays with the Build Alternative, especially in the design year (2040), resulting from traffic that would shift from local roadways onto US 101 to utilize the proposed express lanes. The proposed project would encourage vehicles to use US 101 instead of other local parallel routes. The proposed project would not create an additional source of traffic, unlike a housing development or a commercial property.

This intersection is likely affected by the increased number of vehicles heading towards US 101 and using the Veterans Boulevard/northbound on-ramp intersection to access the freeway.

Chapter 3, Traffic/Transportation describes the many benefits and some impacts of the proposed project on traffic. With regard to ramp terminal intersections, Chapter 3 states:

“In 2020, one ramp terminal intersection in the AM and two in the PM peak period would experience a drop in LOS for the Build Alternative when compared to the No Build Alternative. In addition, one intersection in the AM and two in the PM peak period would improve in LOS for the Build Alternative compared to the No Build Alternative. In 2040, one intersection in the AM and one intersection in the PM peak period would experience a drop in LOS from the Build Alternative when compared to the No Build Alternative. In the same period, five intersections in the AM and two intersections in the PM peak period would improve in LOS for the Build Alternative compared to the No Build Alternative.”

On average, by 2040, the proposed project would improve LOS at ramp terminal intersections. The proposed project would not represent a significant impact to the environment because, while it would result in a 5-second delay at the Veterans Boulevard/Whipple Avenue intersection, the project’s contribution to the delay at that intersection is only a tiny percentage of the overall increase from anticipated future traffic conditions that are not related to the proposed project.

The project study area does not include any uncontrolled crossings in the City of Redwood City. The minor increases in delays as a result of traffic shifting from local roads to and from US 101 are not expected to result in negative safety outcomes for pedestrians and bicyclists. Intersection movements would still be controlled by signal and all cross walks and safety signage would remain in place. The proposed project would not make any physical modifications to the intersections.

The revenues collected from the proposed express lane would first be used to fund operations and maintenance of the project facility, however, the remaining funds would be available for alternatives to driving, which may include additional transit operations. This would result in
improved person throughput within the project corridor, and transit would experience more reliable travel times by using the express lanes.

8-12

The magenta lines signify studied sound walls and the green lines signify replacement sound walls. The associated numbers correspond to sound wall number as noted in Table 2.2.7-6. The Appendix C Major Project Features legend has been updated to reflect the meaning of the magenta and green lines.

8-13

The comment has been noted. Thank you for this information.
Comment Letter 9: Brad B. Underwood, City of San Mateo

January 19, 2018

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

RE: U.S. Highway 101 Managed Lanes Project Draft Environmental Impact Report/Environmental Assessment – Comments from the City of San Mateo

To whom it may concern:

The City of San Mateo has reviewed the Draft Environmental Impact Report/Environmental Assessment and has the following comments:

9-1
- Soundwalls (page 1-19): The City formally requests that the Managed Lanes project include an enhanced aesthetic treatment to the soundwalls being replaced, particularly to address the Medium to High Viewer Response in Key Views 4 through 9 under Section 2.1.9: Visual/Aesthetics.

9-2
- 2020 AM Peak Period Travel Speeds and Time (page 2-30): Include discussion about actual increased travel times to be experienced

9-3
- 2040 PM Peak Period Travel Speeds and Time (page 2-33): Include discussion about actual increased travel times to be experienced

9-4
- Parking (page 2-35): Elaborate on the specific location where on-street parking is being removed

9-5
- TRA-1: Overcrossing Closure Plan (page 2-36): Conduct additional outreach to inform the public prior to the closure. Provide larger radius of detour signage than only at the overcrossing access point.

9-6
- Key View 8: Proposed Condition (page 2-55): Include the total number of parking spaces being removed, and the total number being reconstructed. Include more detailed discussion about where the new parking will be located.

9-7
- 2.1.9.4 Avoidance, Minimization, and Mitigation Measures (page 2-59): Are any measures being considered for VIS-8 and VIS-9? If not, provide a statement as such.

9-8
- Table D-9 (page D-12) and Table D-10 (page D-13): In both the 2020 and 2040 year analyses, the PM peak hour delay at the 101 NB Off-Ramp/ Hillsdale Boulevard increases. The City would like to formally request that consideration be made to include 101 NB Off-Ramp improvements with the Managed Lanes project. Considering the project will not address congestion issues surrounding the US-101/SR-92 interchange, this intersection will experience further degradation impacts as a result of the project. The off-ramp right-turn lanes experience severe backup in the afternoon peak hour as vehicles cut-through San Mateo and Foster City to avoid the US-101/SR-92 interchange.
Per the attached drawing, the improvement would construct an extension to the existing outside right-turn lane and re-stripe the off-ramp to provide two dedicated right-turn lanes, one shared left/right turn lane, and one left-turn lane, allowing for additional storage capacity on the off-ramp, and providing a dedicated lanes for the right-turn movement.

Thank you for your time and consideration of our comments.

Sincerely,

Brad B. Underwood  
Director of Public Works  
Department of Public Works  
City of San Mateo
Response to Comment Letter 9: Brad B. Underwood, City of San Mateo

9-1

The response is noted. The US Highway 101 Managed Lanes Project would comply with the landscape design standards that define the architectural features on both sides of the replacement walls. Caltrans Landscape Architecture will consider the requirements and will be in contact with the City of San Mateo regarding the aesthetics of the replacement walls.

9-2

The changes were made to Section 2.1.8.3 as requested by the comment.

9-3

Please see the response to Comment 2-1.

9-4

The Final EIR/EA has been updated to reflect refinements in the preliminary project design. The proposed project would no longer result in changes to parking at this location. However, the Build Alternative would require the removal of approximately 15 parking spaces on North Bayshore Boulevard south of Dore Avenue and a parking lot would be created at North Bayshore Boulevard and Dore Avenue behind the existing sound wall. Updates have been made to Sections 1.4 and 2.1.9.3 of the Final EIR/EA. The proposed changes represent information based on preliminary design and will be further refined during final designs.
Section 2.1.9.4 provides seven avoidance and minimization measures for potential visual resources effects at any of the key views. These measures do not correspond specifically to each key view. Therefore, they would serve to minimize project effects for all views.

Tables D-10 and D-11 included in Appendix D of the EIR/EA, show that the US 101 northbound ramps/Hillsdale Boulevard intersection would operate at LOS E for the PM peak hour in 2020 and 2040 with and without the proposed project. The recommendation provided as part of the comment is noted. The Caltrans Design Team will take the recommendation into consideration as a future project. The proposed project would not preclude future improvements to the intersection.

With regard to congestion on the US 101/SR 92 interchange, SMCTA is currently partnering with sponsors on two projects to examine the interchange and improve this critical connection. These two projects are included in SMCTA’s Highway Program of Projects. Updates can be found by visiting www.smcta.com and navigate to their "Media Relations" then “News” link. The proposed project would not preclude improvements to the US 101/SR 92 interchange.
Comment Letter 10: Roy Molseed, Santa Clara Valley Transportation Authority

January 19, 2018

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

Attention: Yolanda Rivas

Subject: US 101 Managed Lanes Project in San Mateo County

Dear Ms. Rivas:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR/EA for the US 101 Managed Lanes Project (Managed Lanes Project) in San Mateo County. We have the following comments.

Design Coordination

VTA, in cooperation with Caltrans, is completing the final PS&E Phase of the US 101 and SR 85 Express Lanes Project Phase 3 (Phase 3 Project) in Santa Clara County. Because the Phase 3 Project limits extend to the County line, we want to insure there are no conflicts between project elements of the two express lanes projects. Therefore, we have the following specific comments on the Draft EIR/EA:

10-1

- On page 1-1, the stated project limits includes the segment in Santa Clara County between San Antonio Road in Palo Alto to the Santa Clara/San Mateo county line. This conflicts with the Phase 3 Project limits including the Phase 3 Project 65% Design that has been developed and extends to the county line. Our project team has already communicated this to the San Mateo US 101 Managed Lanes project team with the expectation that the infrastructure designed and installed by the two projects are coordinated with one another. Our expectation is that the model for this coordination would be the coordination efforts used for the I-880 Express Lanes and SR 237 Express Lanes at the Alameda/Santa Clara county line. The likelihood of changes during the Design phase based on coordination efforts with the VTA project should be noted.

10-2

- Page 1-2 states that “The express lanes for the VTA project are anticipated to open in 2022.” This statement should clarify that the Phase 3 Project (the first phase of express lanes on US 101 in Santa Clara County) is anticipated to open in 2021.

10-3

- On page 1-3, Figure 1.1.1-1 and page 1-13, Figure 1.4.1-1, similar to the first comment above, the text should be clear that the actual implementation of the San Mateo Managed Lanes Project is to be coordinated with the VTA-led work already in the Design phase on Santa Clara County side of the county line.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

US 101 Managed Lanes Project

Department of Transportation
January 19, 2018
Page 2

10-4

- Pages 1-10, Section 1.3.3 and page 1-11, Section 1.4, make reference to the southern segment from San Antonio Road, which is well within the limits where VTA has design work already underway for the Phase 3 Project. The text should clarify this condition and the likelihood for changes during the Design phase based on coordination between the two projects.

10-5

- In Appendix C, Sheets 1, 2, 3, and 5 of 59, the Proposed Major Projects Features map show VTMS signs, overhead sign trusses, toll readers, Electronic Toll System (ETS) conduits, and service points from south of Adobe Creek to the Santa Clara/San Mateo County line. Again, this infrastructure is within the limits of where VTA has design work already underway for its Phase 3 Project and so it should be noted that what is shown on these maps would undergo modification based on coordination in the Design phase.

10-6

In addition, please include VTA’s project, the US 101/SR 85 Express Lanes Phase 3 Project (EA #04-1K551) in the project specifications under Section 5, Control of Work, for cooperation of contract with coincident or adjacent contracts.

10-7

VTA looks forward to continued coordination on this project. The Phase 3 project team will continue the ongoing communication with the San Mateo US 101 Managed Lanes project team and would welcome the scheduling of a design coordination meeting for the two projects.

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,

Roy Molseed
Senior Environmental Planner

cc: Patricia Maurice, Caltrans
    Brian Ashurst, Caltrans

Response to Comment Letter 10: Roy Molseed, Santa Clara Valley Transportation Authority

10-1

Thank you for this information. The US Highway 101 Managed Lanes Project would be completed in coordination with the US 101 Express Lanes Project for the overlapping portion of the corridor. Sections 1.2.2 and 1.4.1.1 were edited to include this information as requested.

10-2

The change was made as requested.
10-3

The US Highway 101 Managed Lanes Project would be completed in coordination with the US 101 Express Lanes Project for the overlapping portion of the corridor. This information was added to Section 1.4.1.1.

10-4

Please refer to the response to Comment 10-3.

10-5

Please refer to the response to Comment 10-3.

10-6

The commenter's request is noted. When the notice to bidders for construction on State highways is prepared, the US 101/SR 85 Express Lanes phase 3 project will be included in the project specifications for cooperation of contract with coincident or adjacent contracts.

10-7

The comment is noted. Thank you for this information.
I.3 Comments from Organizations

Comment Letter 11: Adina Levin, Friends of Caltrain

Department of Transportation, District 4
Attn: Yolanda Rivas
P.O. Box 23660 MS 8B
Oakland, CA 94623-0660
Email: SM101DEIR_EA_comments@dot.ca.gov

January 19, 2018

Dear Ms. Rivas,

Please accept the following comments on behalf of Friends of Caltrain regarding the DEIR for the Highway 101 Managed Lanes Project.

Friends of Caltrain is a 501c3 nonprofit supporting sustainable transportation on the Peninsula Corridor from San Francisco through San Jose. We have over 6,000 participants engaging in regional and local decisions on Caltrain, sustainable transportation, and transit-supportive policies on the corridor.

The Highway 101 managed lanes project proposed by Caltrans, San Mateo City/County Association of Governments (C/CAG) and the San Mateo County Transportation Authority (SMCTA) offers an opportunity to improve mobility while improving the sustainability of the area’s highways by increasing person throughput, with greater use of carpooling and transit.

The project proposes to

1. 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.

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 managed lanes would allow transit vehicles and carpools with 3 or more passengers to travel without a fee, and when there is available capacity in the lane, would allow solo drivers to access the lanes for a fee.

Benefits of the project include a 10-20% increase in person throughput along the corridor and double digit increases in carpooling. In addition, 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. 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.

1. **Delays and total vehicle travel skyrockets with or without the project.** Given expected employment and population growth, with the Build Alternative travel times would jump to two and a half times existing conditions from 59,000 hours 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 carpoffiers, 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 26%, with No Build or the Build Alternative. The analysis of VMT considers diverted trips from other roadways, but it does not consider changes in housing and employment that may take place if initial congestion relief encourages more commuting on the corridor.

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 goal.
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. We recommend the following steps to ensure that managed lanes actually deliver benefits for mobility, for our climate, and for commuters at all income levels:

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. **Better integration between the 101 Managed Lane Project and the Express Bus Study.** While the Express Bus Study has not been released as of the deadline for 101 Managed Lane EIR comments, we observe that the 101 managed lane project does not include any "duckouts" for express bus routes to have intermediate stops. Therefore, logically, the express bus routes will be constrained to "point to point" routes. While express bus routes should have relatively few stops in order to maintain competitive speed, we also see based on Caltrain’s performance with its Baby Bullet service that there is robust seat turnover, in other words, many passengers use intermediate stops, resulting in higher ridership and farebox recovery. We are concerned that a Managed Lane project design with no bus duckouts, precluding intermediate stops, will result in longterm underperformance of express buses, reducing the person-throughput of the project. We therefore recommend study of an option with strategically selected bus duckouts to optimize the potential of express bus service.

3. **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:
   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.
   d. Provision of "combo passes" that allow use on managed lane, express bus, and rail service, providing price-sensitive commuters with flexibility to take transit when they can without double-paying when they use different modes in month.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

**4. Utilize toll revenues locally for services and programs that improve person-throughput**

Highway managed lane projects represent a different kind of project than previous generations of roadway projects. Classic highway projects deliver “hardware” - paved lanes and on/offramps that enable vehicle travel. To be most effective, managed lane projects need to deliver both “hardware” and “software” - technology to optimize the number of vehicles in the lanes to maintain traffic flow, and also services and programs to provide the greatest “person-throughput” in the lanes.

We observe that the 10-20% improvement in person-throughput projected in the plan will not be enough to provide longterm mobility benefits in the corridor, and will not be enough to achieve the climate goals of the region and state.

To achieve the goals, the project should:
* consider stronger integration with the Express Bus program by supporting intermediate stops
* create a 101 Mobility Action Plan and Equity Strategy to further increase person-throughput, while serving a broad range of the population

We would urge 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.

Thank you for your consideration,

Adina
Adina Levin
Friends of Caltrain
[http://greencaltrain.com](http://greencaltrain.com)
650-646-4344

**Response to Comment Letter 11: Adina Levin, Friends of Caltrain**

The comment is correct that traffic delays and volumes in 2020 and 2040 are forecasted to increase compared to the existing condition, with or without the project. The traffic modeling accounted for expected employment and population growth in 2020 and 2040 as described in Section 2.1.8.2 (under "Traffic Operations Analysis Study Area and Methods"). The delay times noted in the comment are summarized from EIR/EA Table 3.2-1. As shown in that table, the Build Alternative would reduce delay times compared to the No Build Alternative by an estimated 5,625 hours in 2020 and 8,619 hours in 2040. This is considered a beneficial outcome.

As the comment indicates, under the No Build Alternative, limited capacity on US 101 is anticipated to worsen and result in trip diversions from the US 101 mainline and ramps to other parallel routes, such as El Camino Real and I-280, from the Whipple Avenue Interchange to the
I-380 Interchange (Section 2.1.8.2, under "Trip Diversion"). The traffic analysis shows the Build Alternative would reduce trip diversion to parallel routes compared to the No Build Alternative (Section 2.1.8.2, under "Trip Diversion"). This is also considered a beneficial outcome.

Within this extended project corridor, the project would help consolidate trips onto US 101 from local roads, as travelers take advantage of the additional capacity with the Build Alternative. This is especially evident in 2040 when congestion on all roads, both local and the freeway, would increase due to continued land use growth as predicted in local land use plans. As this shift occurs, there will be areas of increased congestion on US 101. However, the proposed project would provide the benefit of allowing greater person throughput and create incentives for carpooling because of the extension of HOV availability on US 101 from Whipple Road in Redwood City all the way north to I-380 in San Bruno/South San Francisco. Specifically, as noted in the comment, the largest travel time increase would occur at 5:30 PM traveling between SR 92 and Whipple Avenue (as shown in Table D-8 in Appendix D). The traffic model results that indicate this delay represent a worst case scenario in 2040. The reasons for this are explained in more detail below.

Travel times would increase with and without the proposed project due to queueing that extends from the Rengstorff Avenue interchange, outside of the project study limits. With the proposed project, two factors affect the Rengstorff Avenue bottleneck queue length. The first is an increase in volumes on US 101 with the Build Alternative compared to the No Build Alternative. With the Build Alternative, an increased number of travelers would choose US 101 over parallel routes such as El Camino Real and I-280.

The second factor affecting queue lengths is that under the Build Alternative the existing bottleneck at Millbrae Avenue would dissipate, which would allow traffic from the northern section of the corridor to reach the southern section of the corridor (south of Whipple Avenue) faster in 2040. However, the southern section would contain less capacity than the northern section since it would have three general purpose lanes and one express lane compared to four general purpose lanes and one express lane north of Whipple Avenue, as stated in the comment. This configuration continues from Whipple Avenue to south of Embarcadero Road/Oregon Expressway. The bottleneck that would exist at Rengstorff Avenue with and without the proposed project would create traffic queues that back up into the project limits. Under the Build Alternative, more traffic would be able to reach Rengstorff Avenue sooner. The queues from this bottleneck would be generated further north compared to the queues generated in the No Build Alternative.

With the Build Alternative, travelers have the option of using the express lane to decrease their travel time. Total southbound travel time in 2040 for travelers beginning trips at 5:30 PM would be 64 minutes in the HOV/general purpose lane under the No Build Alternative compared to 40 minutes in the express lane with the Build Alternative. In the majority of the other travel directions, peak periods, and departure times for the general purpose lanes in 2040 (Tables D-5 through D-7 in Appendix D), the Build Alternative would provide travel time savings (a reduction in congestion) compared to the No Build Alternative. In all 2040 scenarios, the Build Alternative would reduce travel times in the express lanes compared to those in the HOV/general purpose lanes.
A future project could improve the US 101 interchanges at San Antonio Road and Charleston Road/Rengstorff Avenue and provide a new auxiliary lane (RTP ID 17-07-0034). When completed (anticipated in 2024 per Plan Bay Area 2040), this project could help to address the bottleneck at Rengstorff Avenue that is predicted to occur with or without the US 101 Managed Lanes Project, and could reduce the amount of delay anticipated for the Build Alternative.

See the response to Comment 6-4 regarding the change in vehicle miles traveled (VMT) with the project. It should be noted that the forecast model used for the analysis accounted for the regional area, which includes other major roadways and arterials such as I-280 and SR 82 (El Camino Real). With the Build Alternative in place, the model shows an overall increase of 1.2 percent in VMT over the regional area and not just the US 101 corridor. This suggests that with improved conditions along US 101, some vehicles may use this corridor as an alternative to the other corridors in the region. Therefore, the person throughput along US 101 may increase at a higher rate, but the 1.2 percent increase in VMT would apply over the regional area.

The potential for project-related changes in housing and employment is considered in Section 2.1.4 as well as in Chapter 3 (under “Population and Housing”). The Build Alternative would allow some travelers the opportunity to shift to US 101 from alternative routes such as I-280 and El Camino Real because US 101 would operate at slightly higher speeds. However, the Build Alternative would not influence travel patterns such that it would change access to housing or employment; make some areas more attractive for development over others; or increase access in a way that would affect the location, rate, type, or amount of growth or land use change.

The 80 percent reduction in GHGs referenced in the comment is one of the provisions of Executive Order (EO) S-3-05 (June 2005). EO S-3-05 set a goal for California to reduce its GHG emissions to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050. EO B-30-15 (April 2015) established an interim statewide GHG emission reduction target of 40 percent below 1990 levels by 2030 in order to ensure that California meets the 80 percent reduction target by 2050, as required by EO S-3-05.

The 80 percent reduction target is a statewide goal to be accomplished through transportation and non-transportation methods, and not meant to apply project-by-project. For example, according to the Scoping Plan emissions reductions in the transportation sector will be met largely through conversion of fuels and engines, as well as by more use of buses and carpools (which the proposed project accommodates). While individual projects are not required to meet the 2050 reduction target, additional information has been added to Section 3.1 to demonstrate how the proposed project will assist the State in achieving its goals.

The recommendation for a Mobility Action Plan is noted. The project would not preclude the implementation of this recommendation.

As noted in Comment R80-11, Caltrans is currently working with SamTrans, C/CAG, VTA, SFCTA, MTC, and advocacy groups to develop a Mobility Action Plan. Measures to reduce solo
driving and increase transit participation and carpooling would benefit from the Build Alternative.

11-6

The suggestion is noted. The proposed express lane in each direction under the Build Alternative would be an open access lane where vehicles would not be restricted to certain access points only. Therefore, buses would be able to enter and exit the lane at any location.

11-7

The suggestion for an Equity Strategy and examples is noted. Caltrans believes that this would be an important consideration. This would require working closely with a variety of stakeholders such as MTC, SMCTA, SamTrans, Caltrain, and/or VTA in order to properly integrate lower income automobile users and transit riders. Caltrans is responsible for the highway system, and therefore, the implementation of an Equity Strategy may require analysis from these other implementing agencies. Though the suggestions in this comment would be out of scope for the proposed project, the project would not preclude this from being carried out in the future.

11-8

The commenter's suggestion is noted. Revenues collected would be used to fund operations and maintenance then alternatives to driving, which would improve person throughput.

As noted in Section 1.4.1.6, the Build Alternative would include vehicle detection systems to monitor traffic speed and density, enforcement, incident management, and other subsystems to maintain acceptable traffic flow in the express lanes. These project components would benefit HOVs by increasing travel time reliability in both 2020 and 2040. Several other services and programs that are separate from the proposed project serve to increase person throughput, including Caltrans park and ride lots and ridesharing tools and apps such as the 511.org "Ridematch" service. By giving priority use of the managed lanes to HOVs with 3 or more occupants, the project would support these services and programs.

11-9

The recommendations for intermediate stops for express buses, a Mobility Action Plan, and an Equity Strategy are noted. The project would not preclude the implementation of these recommendations.

Please see the responses to Comments 1-5 and 11-7.

11-10

The comment is noted. Please see the response to Comment 1-5 and 11-7.
Comment Letter 12: Diane Bailey, Menlo Sparks (1 of 2)

Response to Comment Letter 12: Diane Bailey, Menlo Sparks (1 of 2)

The comment suggests converting an existing general purpose lane to an express lane. This option was considered as Alternative 3 but was ultimately rejected. Please refer to the response to Comment 6-2 and Section 1.4.6.3 of the EIR/EA for an explanation of this alternative and why it was eliminated from further consideration.
Comment Letter 13: Diane Bailey, Menlo Sparks (2 of 2)

From: Diane Bailey <diane@menlospark.org>
Sent: Friday, January 19, 2018 3:23 PM
To: Weiss, Jeffrey A@DOT; SM 101 DEIR EA Comments@DOT
Subject: Proposed Caltrans 101 San Mateo County Managed Lane Project Comment on DEIR - Please implement express lanes without inducing more vehicle demand

Dear Caltrans Officials,

I write to you on behalf of Menlo Spark, a community nonprofit aimed at a carbon neutral Menlo Park and a sustainable region. Thank you for accepting these public comments on the Draft EIR for the proposed Managed Lanes Project that would build a continuous express lane in each direction on Highway 101 between I-380 and Whipple Road in San Mateo County. I support the project in essence to create managed express lanes that will speed traffic through, allowing for public transit in particular to achieve reasonable, reliable travel times and thus be competitive with Single Occupancy Vehicles. However, we do not support any proposal that would significantly increase vehicle trips through induced demand, for example by adding new lane capacity.

At a recent public workshop in Redwood City, I was told by CalTrans staff that it is infeasible to convert existing lanes to express lanes or carpool lanes or combined High Occupancy Toll lanes. However, this is incorrect for several reasons. First, San Francisco will need to do this to address congestion issues on the 101 through that county, due to lack of sufficient right of way available for additional lanes; they can seek enabling legislation for lane conversions and there’s no reason why that couldn’t apply to San Mateo and other counties. Second, SamTrans plans to convert general use lanes to express lanes on the Dumbarton bridge, as explained in detail in the Dumbarton Transportation Corridor Study released in August, 2017. Third, any solution that adds capacity with new lanes will not solve congestion problems because it would induce more vehicles to travel, clearly demonstrated by transportation experts and modeling. Fourth, connecting auxiliary lanes to form an additional general purpose lane could cause safety hazards for vehicles entering the freeway and contribute to even greater congestion.

We share many of the concerns voiced by the Sierra Club, Loma Prieta Chapter in their January 18th, 2018 comments, and also the important points made by Transform in their comments. We need 21st century solutions to traffic congestion that support public transit, equity, and the environment. Proposing the addition of a general purpose lane (on top of the proposed express lane) is an outdated and ineffective strategy that increases vehicle trips and pollution. We can do better!

We need express lanes on the 101 and Menlo Spark supports this critical step without any additional lanes. We also support development of:

- A 101 Mobility Action Plan (MAP) and significant funding to implement its recommendations.
- An Equity Strategy (and appropriate funding) to maximize the benefits of the managed lanes for people with lower incomes.

Thank you for considering these comments.

Sincerely,
Diane Bailey

Diane Bailey | Executive Director

MENLO SPARK

US 101 Managed Lanes Project I-50 October 2018
13-1

The comment is noted. Please see the response to Comment 6-4 for a discussion of project demand.

13-2

The comment refers to the HOT 3+ Convert a Lane Alternative (Alternative 3). As noted in the response to Comment 6-2, additional information has been added to Section 1.4.6 about the alternative development process. Section 1.4.6.3 lists several factors that led the PDT to eliminate Alternative 3 from further consideration. In particular, the project’s traffic analysis shows that converting a general purpose lane to an express lane with Alternative 3 would increase congestion and travel delays on US 101 compared with both the Build Alternative and the No Build Alternative.

The traffic analysis also shows that the Build Alternative would increase person throughput compared to the No Build Alternative and Alternative 3, as well as encourage travelers to use US 101 instead of parallel routes such as SR 82 (El Camino Real) and I-280. The Build Alternative would not increase capacity such that travelers would switch from carpools and buses to SOVs. Please see the response to Comment 6-4 for additional discussion about the potential for induced demand.

The need for legislative approval to convert a lane was a consideration, but not the primary reason, for not selecting Alternative 3.

13-3

In most locations, changes to auxiliary lanes include converting the existing auxiliary lane into a through lane and replacing the auxiliary lane to the right. Section 1.4.1.4 describes changes to the auxiliary lanes. The auxiliary lane design and spacing for proposed project would be compliant with Chapter 500 of the Highway Design Manual (link: [link])
The commenter's opposition to the project is noted. Please see the response to Comment 11-5 and 11-7 regarding a Mobility Action Plan and equity strategy.
Comment Letter 14: Rosanne Foust, San Mateo County Economic Development Association (SAMCEDA)

January 16, 2018

Bijan Sartipi
District 4 Director
California Department of Transportation
111 Grand Avenue
Oakland, CA 94612

VIA EMAIL: SM101DEIR_EA_comments@dot.ca.gov

Dear Mr. Sartipi:

San Mateo County has long been a birthplace of innovation. Collectively, we lead the world in education, healthcare, biotechnology, technology, software, online media, social media, and the list goes on. The original success which created the suburban communities between San Francisco and San Jose has now intensified to the point where our region is one of the most highly sought after places to live, work, and create transformational companies. **But no issue touches the life of almost every resident, commuter or business of every size on a daily basis more than traffic congestion and mobility.**

The San Mateo County Economic Development Association (SAMCEDA) urges acceptance of the Draft Environmental Impact Report/Environmental Assessment for the SM 101 Managed Lanes Project and fully supports the proposed build alternative. This project is a critical component of a regional plan to address traffic congestion and increase mobility. Specifically, this project will facilitate the following benefits on the US 101 corridor in San Mateo County:

- Encourage carpooling and transit use
- Provide managed lanes for travel-time reliability
- Increase person throughput
- Apply technology and/or design features to help manage traffic
- Reduce congestion in the corridor
- Minimize operational degradation of the general-purpose lanes

SAMCEDA and the Peninsula Mobility Group, which includes some of San Mateo County’s largest employers, are working hard every day to support the many important and exciting solutions underway which will make a difference to reduce congestion and modernize our transit systems and mobility options. I have attached a letter of support from late 2017 for the SM 101 Managed Lanes Project Federal INFRA Grant application which demonstrates the wide support from the business community for this project.
Thank you in advance for your consideration of this request.

Sincerely,

[Signature]

Rosanne Foust
President and CEO
SAMCEDA

Cc: San Mateo County Board of Supervisors
Jim Hartnett, San Mateo County Transit District
Sandy Wong, City/County Association of Governments SMC
Tilly Chang, San Francisco County Transportation Authority
Steve Heminger, Metropolitan Transportation Commission

Attachments:
- SM 101 Managed Lanes Project INFRA Grant application letter of support
Note: The comment included an October 30, 2017, letter to the Secretary of the U.S. Department of Transportation in support of the project. The letter is not a comment on the Draft EIR/EA and therefore is not included; however, it is part of the administrative record for the project and is available upon request.

Response to Comment Letter 14: Rosanne Foust, San Mateo County Economic Development Association (SAMCEDA)

14-I

The commenter’s support for the project is noted.
Comment Letter 15: Greg Greenway, Seaport Industrial Association

Seaport Industrial Association, 675 Seaport Blvd., Redwood City, CA, 94063

January 19, 2018

Bijan Sartipi
District 4 Director
California Department of Transportation
111 Grand Avenue
Oakland, CA 94612

Dear Mr. Sartipi:

I am writing to express the strong support of Seaport Industrial Association (SIA) for the build alternative proposed in the Draft Environmental Impact Report/Environmental Assessment for the SM 101 Managed Lanes Project.

The addition of express lanes on US 101 in San Mateo County is critical for our local and regional economy and to support other planned improvements on this corridor at the 101/SR 84 interchange and the 101/SR 92 interchange. Managed lanes make sense on this corridor and will also provide the following benefits on the US 101 corridor in San Mateo County:

15-1

- Encourage carpooling and transit use
- Provide managed lanes for travel-time reliability
- Increase person throughput
- Apply technology and/or design features to help manage traffic
- Reduce congestion in the corridor
- Minimize operational degradation of the general-purpose lanes

SIA members include nearly all the industrial businesses in the Redwood City port area. They provide essential construction materials and large-scale recycling services to homeowners, businesses and public agencies. Reliable freeway access is a critical link in the local system for moving cargo by water, rail and roadways throughout the Peninsula and Silicon Valley.

We urge you to approve the DEIR/EA and move this important project forward.

Sincerely,

Greg Greenway
Executive Director
Response to Comment Letter 15: Greg Greenway, Seaport Industrial Association

The commenter's support for the project is noted.
Comment Letter 16: Gladwyn d’Souza, Sierra Club, Loma Prieta Chapter

From: Barbara Kelsey <barbara.kelsey@sierraclub.org>
Sent: Thursday, January 18, 2018 5:40 PM
To: SM 101 DEIR EA Comments@DO
Cc: spurewal@smc.gov; sgolestan@smc.gov; dpine@smc.gov; cgroom@smc.gov; dhonsley@smc.gov; wslocom@smc.gov; dcanepe@smc.gov; dSouza, Gladwyn; Mike Ferreira
Subject: The Highway 101 expansion EIR in San Mateo County
Attachments: 101 expansion EIR in SMC 11818.pdf

Dear Board of Supervisors,

Thank you for the opportunity to comment on the 101 expansion EIR in San Mateo County. The Sierra Club asks that the EIR be rejected because it provides only a Business As Usual build alternative while not saying why past attempts at capacity increases have failed and does not use feasible alternatives to solve the problem. Please see our comment letter attached.

Respectfully,

Gladwyn d’Souza
Chair, Transportation Committee
650-804-8225
Co-Chair, Sustainable Land Use Committee
Sierra Club, Loma Prieta Chapter
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Sierra Club Loma Prieta Chapter
Serving San Mateo, Santa Clara
and San Benito Counties
Protecting Our Planet Since 1933

3921 East Bayshore Road, Suite 204
Palo Alto, CA 94303

January 18, 2018

To: sm101deir_ea_comments@dot.ca.gov

Cc: San Mateo County Board of Supervisors
    Sherry Golestan, Deputy Clerk of the Board
    Sukhmani S. Purewal, Assistant Clerk of the Board

Thank you for the opportunity to comment on the 101 expansion EIR in San Mateo County.

The EIR claims that the project will only increase VMT (Vehicle Miles Travelled) by 1% (page 2-152). It says that the proposed project “would accommodate additional capacity” (page 3-16). Now 1% seems like a small number. However the mandate is for VMT to be reduced according to an analysis by UC Davis [page ii] under AB32 and SB32. The reductions are required under SB375 (page 3). Pre UC Davis VMT reduction should total about 0.5% per year since 1990 - that is 9% so far! VMT growth instead has continued to occur and is projected to continue at almost 1% per year for San Mateo County (page 20). This 1% growth in VMT is the source of California difficulty in meeting it greenhouse gas reduction targets.

The EIR says compared to No Build, the Build Alternative would see a growth of 1.3% in Vehicle Miles Travelled (VMT) expected by 2020 and 1% by 2040 (2-152). This is as bad as Business As Usual (BAU) can get; and it is both wrong and illegal. Caltrans’ inability to understand that the critical contributors to climate change are

5.  https://www.arb.ca.gov/cc/inventory/data/data.htm
transportation is the largest contributor - 39%, (61% in San Mateo County (page 9)\textsuperscript{5}) and the fixes under AB32, need immediate remedy. The remedy needs to be existential - Californians face increased fires, precipitation patterns, and drought from climate change\textsuperscript{3}. VMT reductions now are necessary to allow SB32 reductions of 1% per year after 2035 (UC Davis).

The EIR acknowledges induced driving: “The higher VMT is associated with higher volumes of vehicles that are using the freeway with the Build Alternative” (page 2-152)\textsuperscript{1} However it doesn’t acknowledge how the solutions proposed in the alternatives are also the problem. These days it seems like congestion is a way of life - Highway 101 is in rigor mortis during peak hours and heavily traveled the rest of the time. And yet, 40 years ago it was an idyllic four lane highway with forested sides of pine trees and flowered shrubs running down the median. What happened to bring us wall-to-wall asphalt choked with fumes? We face the stark reality that billions of tax dollars have been wasted on making congestion worse.

Even the Environmental Impact Report of the proposed $534 million widening of Highway 101\textsuperscript{6}, heavily biased to favor expansion, admits that at certain times the project will make congestion worse\textsuperscript{11}. In reality, no congestion relief will materialize at all, and the California Department of Transportation (Caltrans) has acknowledged that highway widening simply doesn't work. San Mateo County has been “building congestion” for decades by widening highways while starving public transit improvements for funding. Wider highways and multi-lane roadways have made walking and bicycling a rarity rather than a commonplace mode of transportation, further contributing to worsening congestion. Just ten years ago almost $400 million was spent to build the auxiliary lanes on Highway 101, which connect on and off ramps with continuous lanes to provide an increase in vehicle capacity.

Acknowledging that the auxiliary lane widening project from ten years ago completely failed would be a first step. Analyzing how other counties and regions, like Seattle\textsuperscript{7}, have successfully absorbed a growing population without adding traffic would be a welcome second step. By asking for yet another sales tax hike to widen highways, county officials are admitting that all their past attempts at relieving congestion have failed. This EIR has no analysis of the failed expansion in this corridor over the last 40 years.

\textsuperscript{5} http://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/SanMateoCo_9620Inventory&ReductionTargetMemo-3-5-12.pdf
\textsuperscript{7} https://oag.ca.gov/environment/impact
\textsuperscript{6} http://www.peopledoweredpress.org/2017/11/22/draft-environmental-review-recommends-widening-highway-101/
\textsuperscript{8} http://www.transformcma.org/transform-blog-post/proposed-express-lanes-wont-fix-traffic
\textsuperscript{9} https://usa.streetstimesblog.org/2017/12/18/seattle-adds-people-without-adding-traffic/
According to Caltrans, reducing GHG (Greenhouse Gases) requires us to shift trips now. Specifically, Caltrans writes in CTP2040\(^{11}\): “Increase a shift to more sustainable modes (mode shift) to reduce per capita miles traveled (VMT)” (page 25). The tools are all feasible today and have deployed from cities like San Francisco to countries like England. The strongest tool according to UC Davis\(^{12}\) is pricing. Moderate tools include infill development and Transportation Demand Management.

Expanding highways does not reduce VMT as the EIR shows with the BAU increase in VMT from the Build Alternative. This is a serious deficiency in the EIR. Studies have shown that the county will always welcome more of other people’s money into its coffers; but as we’ve found out from the 40 years of expansion of Highway 101 in San Mateo County (2-186), all the money in the world cannot compensate for poor land use planning decisions. What we get is the state of 101 which foretells a future of wall to wall gridlock.

One argument we’ve heard for highway expansion is that “something is better than nothing.” This is hopeless and ignorant. It gives up on a vision of clean air, climate action, fiduciary government, and successful public transit systems that have been implemented worldwide. We cannot just do the same something that has failed for decades; we must instead do something that will actually work to make things better. We need to reduce the number of automobiles and provide credible alternatives to driving.

Metropolitan areas where air pollution is high, have higher cancer rates\(^{13}\), despite a similar death rates to rural areas. Cancer is the second leading cause of death\(^{14}\). The leading cause, heart disease is related to a sedentary lifestyle caused by driving\(^{15}\). Asthma is growing and linked to the distance from the large road\(^{16}\). Car crashes are the 12th leading cause of death—well the leading causes for people between 12 and 25 years of age. The lost life years ranked seventh\(^{17}\). Yet despite all these dire health problems, the EIR has no analysis of the populations impacted by being close to the expanding road. Instead the EIR claims that the area is out of attainment (page 2-105). Fixes are necessary as the recent decision against the San Diego Association of


\(^{13}\) [https://www.meriscope.com/viewarticle/882577](https://www.meriscope.com/viewarticle/882577)


\(^{17}\) [https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/912203](https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/912203)
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

16-8, cont.
Governments (SANDAG) reveals. The Court of Appeal affirmed\(^\text{18}\) its prior conclusions that SANDAG failed to reduce climate pollutants, address public health effects, consider alternatives that reduce driving, and assess impacts to agricultural lands. This EIR is leaving itself open to a lawsuit, which unfortunately is the only real alternative to Caltrans determined BAU efforts to kill people\(^\text{19}\) and the planet\(^\text{20}\) with pollution and GHG. These are all reasons not to approve this EIR.

16-9
The EIR further admits that the pollution will be extended to adjacent neighborhoods (page 2-29 trip diversion) with traffic spillover. This is criminal for both health and the climate as explained above.

16-10
The EIR claims that the project is needed to move more people along the US 101 freeway, help address existing congestion, and provide transportation options in the project corridor and region (page i). However, there are easier, more efficient, and cheaper ways to move people as UC Davis and many other studies have shown. Pricing parking and the entire freeway has been shown to work in many cities and countries. Tripling the capacity of Caltrain and converting lanes to bus only lanes will also move a lot more people.

These goals are accomplished by also reducing VMT- i.e. not inducing any more traffic. Instead of expanding freeways, the alternative selected should reduce traffic by increasing mode share as directed by the California Transportation Plan (CTP2040). Doing so with a regressive sales tax just compounds the problem. We should NEVER add lanes. We need to STOP adding lanes, ASAP. Otherwise there is no way climate realism can prevail.

Note that there are other causes of congestion (page 3-25) which are not addressed. The EIR project is trying to solve congestion by only addressing the peak demand cause for which it offers an iffy conclusion: “To the extent that a project relieves congestion by enhancing operations and improving travel times in high-congestion travel corridors, GHG emissions, particularly CO2, may be reduced.” Just expanding the freeway and pricing one lane had been shown to fail everywhere attempted most recently in the LA area. Then the blame for failure falls on the tool, the capped price within the single lane.

Traffic incidents (crashes, aggressive driving, etc.) should be addressed with enforcement cameras; the resultant dynamic speed control would address varying demand volume. Conversion should address bottlenecks. Managed lanes do not

---


address congestion caused by demand attractors such as not: (1) setting the right, demand-based price for curb parking, (2) returning the parking revenue to pay for local public services, and (3) removing minimum parking requirements.

The project proponents should take a network instead of a node approach to the problem. Here Caltrans, like the state, is acting irresponsibly. The state has permitted sales taxes to exceed caps for this project but hasn’t permitted enforcement with cameras, pricing of the entire freeway, bus only lanes and HOT lanes from conversion, and right priced parking. One basic planning issue is very simple—think system, not just specific element. In the California Transportation Plan (CTP2040) Caltrans writes: Efficiently manage, operate, and maintain the transportation system (including construction practices) (page 25). The system includes complete streets which Smart Growth America says: “Complete Streets must be designed to serve the current and future land use, while land use policies and zoning ordinances must support Complete Streets such as by promoting dense, mixed-use, transit-oriented development with homes, jobs, schools, transit, and recreation in close proximity depending on the context.”

The Sierra Club asks that the EIR be rejected because it provides a BAU build alternative while not saying why past attempts at capacity increases have failed and does not use feasible alternatives to solve the problem.

Respectfully,

Gladwyn d’Souza
Chair, Transportation Committee
650-804-6225
Co-Chair, Sustainable Land Use Committee
Sierra Club, Loma Prieta Chapter

https://smartgrowthamerica.org/policy-7-complete-streets-must-designed-serve-current-future-land-use/
Response to Comment Letter 16: Gladwyn d’Souza, Sierra Club, Loma Prieta Chapter

16-1

The commenter's opposition to the project is noted.

16-2

The comment refers to the greenhouse gas (GHG) emission reduction targets set forth in SB 375 (2008), AB 32 (2006), and SB 32 (2016). SB 375 identifies several factors in addition to VMT that influence the State’s ability to meet the climate goals set by AB 32, including land use and development patterns, transit availability, and multimodal travel options.

SB 375 requires the California Air Resources Board to establish greenhouse gas reduction targets for metropolitan planning organizations (in the case of the Bay Area, MTC) based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable Community Strategies.

The Regional Transportation Plan and Sustainable Community Strategy for the project area is Plan Bay Area 2040. The proposed project is included in Plan Bay Area 2040, and Section 3.1 of the Final EIR/EA has been revised to include additional information about the project’s consistency with the Plan and its strategies to reduce per-capita VMT.

The proposed project's reduction in 2020 and 2040 GHG emissions compared to the existing condition (Table 3.1-2), together with the ongoing initiatives and specific project components intended to achieve GHG reductions described in Section 3.1 of the Final EIR/EA, would support statewide efforts to reduce GHG emissions, including under SB 375. The “CEQA Conclusion” discussion in Final EIR/EA Section 3.1 has been revised to include additional information about the project’s consistency with SB 375, AB 32, and SB 32.

See the response to Comment 6-4 in regard to the project-related increase in VMT.

It should be noted that both the UC Davis report and Public Policy Institute of California report cited in the comment both identify express lanes as a pricing strategy to reduce GHG emissions.

16-3

The project-related increase in VMT is not illegal. SB 375 does not set VMT reduction thresholds for specific projects. The project's consistency with SB 375 is discussed in the response to Comment 16-2.

Final EIR/EA Section 3.1 discusses federal, State, and local policies adopted to establish and meet climate change goals. Section 3.1 (under “Project Analysis”) addresses operational and construction-phase CO₂ emissions, sea level rise, and potential adaptation strategies. In addition, the section lists Caltrans initiatives to comply with State climate change policies (under “Caltrans Activities”).

16-4

The comment indicates that the project would induce driving, citing higher VMT on US 101 with the Build Alternative, and suggests that the proposed alternatives contribute to the problem. As
discussed further in the response to Comment 6-4, the Build Alternative would increase person throughput, provide an incentive for travelers to shift to carpooling and transit use due to improved travel time reliability, and allow for traffic that currently diverts to circuitous or parallel routes to shift back to US 101, compared to the No Build Alternative.

The remaining remarks are not comments on the EIR/EA.

16-5

The response to Comment 11-2 discusses future changes in congestion with the Build Alternative compared with the No Build Alternative. The Build Alternative would generally provide travel time savings in 2040 compared to the No Build Alternative. In all 2040 scenarios, the Build Alternative would reduce travel times in the express lanes compared to those in the HOV/general purpose lanes.

The remaining remarks are not comments on the EIR/EA.

16-6

The comment suggests that the EIR/EA failed to consider past projects along the corridor. However, Section 1.2.2 provides a discussion of the changes in the project corridor that led to this project. As noted in this section, the project corridor has undergone many improvements in recent decades to relieve congestion, amid ongoing growth of the region. HOV lanes were constructed in Santa Clara County from Cochrane Road to the San Mateo/Santa Clara County line between 1986 and 2003, and in San Mateo County from the San Mateo/Santa Clara County line to Whipple Avenue in 1991 (FHWA 2008). A series of projects have been completed to add auxiliary lanes to US 101 in San Mateo County. Auxiliary lanes were added from Third Avenue to SR 92 in 1997, from Hillsdale Boulevard to Ralston Avenue in 2001, from Ralston Avenue to Marsh Road in 2004, from Millbrae Avenue to Third Avenue in 2010, from Marsh Road to University Avenue in 2012, from University Avenue to Embarcadero Road in 2012, and from Embarcadero Road to SR 85 in 2014 (SMCTA 2012, Caltrans 2017b, VTA 2017). The proposed project would build on to these improvements by adding an express lane without reversing the gains of past projects.

The project purposes are as follows:
• Encourage carpooling and transit use;
• Improve travel time reliability for HOV/express lane users;
• Increase person throughput (the number of people moved);
• Apply technology and/or design features to help manage traffic;
• Reduce congestion in the corridor; and
• Minimize operational degradation of the general purpose lanes.

The EIR/EA considered a No Build Alternative that would result in longer delays and lower person throughput than the Build Alternative. The Build Alternative would also provide travel time savings and reliability compared to the No Build Alternative.

16-7

The comment suggests that reducing GHGs requires a mode shift to decrease per capita VMT. Please see the response to Comment 6-4 for a discussion of how the proposed project is
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

US 101 Managed Lanes Project

I-66

October 2018

anticipated to cause behavior changes on US 101. The proposed project prioritizes HOVs and buses by providing improved travel time reliability in the express lanes. SOVs would be allowed to use the express lanes only when additional capacity is available and as long as the lane could operate at or above 45 mph, per federal guidelines. This allows the lanes to operate at an optimal capacity and maximize person throughput on the freeway. If the lane reaches capacity, SOVs may be restricted from using the lane and overhead messaging signs would read "HOV ONLY." At times when capacity is available in the express lane for SOVs, pricing would be used to regulate SOV use. The higher the demand for the express lane, the higher the price would be to use the lane. This is described in Section 1.4.1.2, Express Lane Operations.

The commenter also notes that expanding highways does not reduce VMT. The proposed project does not add another general purpose lane to US 101. It adds a managed lane, which adds capacity that is needed to better accommodate existing and future demand while also encouraging carpooling. By 2040, VMT would increase by 1.2 percent over the No Build Alternative but person throughput would increase by 18 percent and 5 percent for the northbound and southbound directions, respectively. The material increase in person throughput with only a minor increase in VMT represents the “shift to more sustainable modes” of transportation to which the commenter refers.

16-8

This comment raises concern that the Draft EIR/EA did not include analysis of air quality or health related issues regarding people who live near the existing freeway, and who might be impacted by vehicle-related emissions associated with the corridor and project.

The project’s potential effects on air quality were studied in accordance with the requirements set forth in Chapter 11 of the Caltrans Standard Environmental Reference (SER). Some pollutants, which include ozone, nitrogen oxides, and volatile organic compounds (VOCs), are regional in nature and cannot be readily associated with individual transportation projects. These pollutants are therefore analyzed on a regional level as part of the air quality conformity process. Other pollutants, such as carbon monoxide (CO), particulate matter (PM2.5), and mobile source air toxics, are analyzed at the project level as required by Chapter 11 of the SER.

All air quality regulations and analyses are based on the goal of achieving ambient air quality standards, which are established to protect public health and welfare with a margin of safety. As noted in EIR/EA Section 2.2.6.1, the Federal Clean Air Act, as amended, is the primary federal law that governs air quality, and the California Clean Air Act (CAA) is its companion State law.

The U.S. EPA, in conjunction with the Department of Transportation, has established the Transportation Conformity Rule (40 CFR Parts 93 and 51) to implement the CAA conformity provisions. The CAA Amendments of 1990 require transportation plans, programs, and projects that need federal funding or approval to conform to State or federal air quality plans for achieving national ambient air quality standards (NAAQS). The NAAQS and other federal regulations provide the basis for air quality analyses under NEPA.

Conformity is a parallel process under the CAA. Conformity is defined by Section 176(c) of the CAA (42 USC 7506[c]) as conforming to the purpose of the State Implementation Plan (SIP) to ensure that transportation plans, programs, and projects do not: 1) produce new air quality violations, 2) worsen existing violations, or 3) delay timely attainment of NAAQS. According to
the CAA, federally supported activities must conform to the SIP’s purpose of attaining and maintaining the NAAQS. Efforts to attain and maintain the NAAQS include the BAAQMD’s 2017 Clean Air Plan, which provides a regional strategy to protect public health and the climate.

With regard to the case cited in the comment, Cleveland National Forest Foundation v. San Diego Association of Governments (SANDAG), the EIR under review in this case was a program EIR for its 2050 Regional Transportation Plan and Sustainable Communities Strategy. This is similar to Plan Bay Area 2040, MTC and ABAG’s regional transportation plan, which includes the proposed project (as noted in Section 1.1). The decision rendered in the SANDAG case is not directly applicable to preparation of a project level EIR, such as this document. However, this EIR/EA is compliant with the regional transportation plan, as determined during the CAA conformity process.

In determining whether a project conforms with an approved air quality plan, agencies must use current emission estimates based on the most recent population, employment, travel, and congestion estimates determined by an area’s metropolitan planning organization (MPO). The MPO for the Bay Area is the Metropolitan Transportation Commission (MTC). MPOs are required to develop and maintain long-range plans and programs, such as 20-year Regional Transportation Plans (RTPs) and 4-year (or longer) Regional Transportation Improvement Programs (TIPs) that set forth transportation policies and programs for the region. MTC’s RTP is a blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the nine-county Bay Area through 2040. As part of the RTP and TIP, regional air quality analyses are conducted of emissions from planned transportation projects in combination with other planned growth and development. The analyses compare net emissions of pollutants on a regional basis by modeling total emissions for the region with and without the planned transportation projects.

A conformity determination indicates that the total emissions projected for all transportation projects in an RTP or TIP are within the emissions limits (budgets) established by the SIP, and that transportation control measures (TCMs) in approved SIPs are implemented in a timely fashion to achieve the NAAQS.

The CEQA checklist in Chapter 3 includes similar criteria to the conformity process, in particular, whether a project would conflict with or obstruct implementation of an air quality plan, violate an air quality standard, or contribute substantially to a violation of a standard. Additional CEQA criteria include whether the project would result in a cumulatively considerable net increase of a nonattainment pollutant, expose populations to substantial pollutant concentrations, or create objectionable odors.

EIR/EA Section 2.2.6.3 (under “Regional Air Quality Conformity”) includes a summary of the project’s conformity process and conclusion. The project was included in MTC’s regional analysis of transportation projects and was determined to conform with the SIP. The air quality analyses demonstrated that the Bay Area region can meet air quality goals, and therefore it does not conflict with implementation of an air quality plan.

EIR/EA Section 2.2.6.3 describes the evaluation of project effects on carbon monoxide (CO), particulate matter (PM$_{2.5}$), and mobile source air toxics (MSATs).
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

The Bay Area is an attainment area for the State CO standard and a maintenance area for the federal CO standard. Carbon monoxide emissions modeling for the Build and No Build Alternatives in 2020 and 2040 was performed and showed that the project would not exceed State or federal CO standards.

The Bay Area is in nonattainment of the State and federal PM$_{2.5}$ standards. PM$_{2.5}$ was addressed through consultation with the Bay Area Air Quality Conformity Task Force, which includes representatives from federal (U.S. Environmental Protection Agency Region 9, Federal Highway Administration, Federal Transit Administration), State (California Air Resources Board, Caltrans), regional (MTC, Bay Area Air Quality Management District, and Association of Bay Area Governments), and sub-regional (Congestion Management Agencies, transit operators, local jurisdictions, etc.) agencies. The project was determined to not be a project of air quality concern, which means it would not result in an air quality violation of PM$_{2.5}$.

In addition to the criteria pollutants for which there are air quality standards, mobile source air toxics (MSATs) were also analyzed (see Section 2.2.6.3). The Build Alternative would slightly increase MSAT emissions compared to the No Build Alternative; however, MSAT emissions with the Build Alternative in both 2020 and 2040 would be lower than under existing conditions.

The Bay Area is unclassified for the federal but in nonattainment of the State PM$_{10}$ standards, and in nonattainment of the federal and State ozone standards. The current federal process does not require hot spot analyses for PM$_{10}$. Ozone is among the criteria pollutants analyzed in the regional conformity process conducted for the RTP and TIP. The conformity process must show a long-term benefit between no project and project conditions. As a project included in these conformity evaluations, the Build Alternative would not result in a considerable net increase in ozone and would not result in an exceedance of an air quality standard.

The project would not expose populations to substantial pollutant concentrations because it would meet regional conformity requirements for all criteria pollutants. See the response to Comment 21-16 regarding the analysis of GHGs.

The page reference stated in this comment describes these conditions under the No Build Alternative. Without the project, traffic demand is anticipated to increase and cause trip diversions from the US 101 mainline and ramps to other parallel routes due to the limited capacity on US 101. The Build Alternative would not increase traffic spillovers to adjacent communities and would instead decrease traffic on routes parallel to US 101.

The commenter's opposition to the project is noted.

The comment notes the proposed project would not address congestion beyond the peak period and suggests that a capped price in a single lane has been shown to be a failure. The proposed express lane would not involve a flat rate or capped price; dynamic toll pricing would be used to
regulate the number of toll-paying SOVs using the express lanes in order to manage performance of the lanes. As the express lane becomes congested, the toll price would increase. If the lane reaches capacity, SOVs would be restricted from using the lane and overhead messaging signs would read "HOV ONLY."

With regard to traffic enforcement, CHP has jurisdiction for traffic enforcement on US 101. CHP enforcement areas have been designated as part of the proposed project at the request of CHP. The use of cameras for enforcement has not been requested by CHP at this time, but the proposed project would not preclude the use of enforcement cameras in the future.

Parking and parking pricing improvements would be out of the scope of this project as parking facilities are not included in the project. This project would not preclude local jurisdictions from implementing restrictions on curb parking, removing minimum parking requirements, or using parking revenues to pay for public services.

The comment also addresses Complete Streets. The proposed project does not incorporate Complete Streets as the project limits are restricted to the US 101 freeway. Complete Streets implementation is therefore out of the scope of this project. However, the proposed project would not preclude local jurisdictions from implementing Complete Streets in the communities that border US 101.

The proposed project is one project among many in the project corridor designed to increase HOVs and decrease congestion. This project would prioritize HOVs and provide travel time incentives to HOVs and buses.

16-12

The commenter's opposition to the project is noted.
Comment Letter 17: Jean McCown, Stanford University

January 18, 2018

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

Dear Ms. Rivas,

Thank you for giving Stanford University the opportunity to provide comments on the U.S. Highway 101 Managed Lane Draft Environmental Impact Report. This study evaluating mobility solutions on U.S. HWY 101 is important to ensure economic prosperity and vitality for the Bay Area.

The Peninsula Corridor between San Francisco and San Jose is a tremendous economic success story, generating jobs for residents, tax revenues for governments, products and technologies that have transformed the ways that we live and work. In order to sustain this tech and innovation hub ahead of competitor regions around the world, government, private sector business leaders and educational institutions such as Stanford have worked together to help find transit solutions that allow commuters to get from their homes to major job centers more efficiently.

Stanford University has strived not only to reduce traffic and congestion on our campus, but throughout the region. As congestion in the region grows, our students, faculty and staff face commutes that are long and onerous, forcing them to spend more time commuting and away from their families.

We support California Department of Transportation, the San Mateo County Transportation Authority, and the City/County Association of Governments of San Mateo County, in their coordinated, regional effort to find solutions to improve throughput and better manage traffic in this major Peninsula arterial.

Sincerely,

Jean McCown
Associate Vice President, Government and Community Relations

Office of Public Affairs
Government and Community Relations
Building 170, First Floor, Stanford, CA 94305-2040 ☎ 650.725.3320 ☏ 650.725.3577
Response to Comment Letter 17: Jean McCown, Stanford University

The commenter's support for the project is noted.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 18: Elaine Breeze, SummerHill Homes

January 19, 2017

California Department of Transportation, District 4
Yolanda Rivas, Environmental Branch Chief
Office of Environmental Analysis, Mail Station 88
111 Grand Avenue
Oakland, CA 94623-0660

Email: Yolanda_rivas@dot.ca.gov
       MJ01DEIR_EA_comments@dot.ca.gov

Subject: SummerHill Apartment Communities Comments to Caltrans in Response to the Draft Environmental Impact Report for the U.S. 101 Managed Lanes Project

Dear Ms. Rivas,

SummerHill Apartment Communities would like to take this opportunity to express our appreciation to Caltrans for the opportunity to submit comments in the response to the Draft Environmental Impact Report for the U.S. 101 Managed Lanes Project.

SummerHill Apartment Communities is the developer of the Carolan Avenue/Rollins Road Residential Development Project in the City of Burlingame (Residential Project). Construction of the Residential Project is starting in spring 2018 with anticipated completion in mid-2020. The project fronts Rollins Road to the south of the Route 101/Broadway interchange and will construct 290 residential units consisting of townhouses and apartment units. The project area was re-zoned by the City of Burlingame from commercial to residential permitting the proposed residential project. The project was cleared and certified via an Environmental Document (ED) in July 2015 (SCH#2014062020). See attached comments and response to Caltrans from the City of Burlingame. The ED evaluated the noise in the surrounding area and determined that a sound wall was not required for the Residential Project. Despite this, the Residential Project has committed to the City of Burlingame (City) and the community to extend the existing sound wall between SB Route 101 and Rollins Road northerly through the Residential Project frontage (approximately 400-ft). It was anticipated that the sound wall height would be 16-ft to match the existing sound wall along the US 101/Rollins Road right of way line. The existing concrete barrier within the limits of the sound wall would be removed (conceptual drawing of proposed sound wall limits is attached).

Background
The Caltrans 2005 Route 101 Widening Project from Millbrae Ave Overcrossing to the 3rd Ave Overcrossing widened Route 101 and constructed a sound wall along the right of way line between Route 101 and Rollins Road that started immediately south of the Residential Project site. To the north of the sound wall, a concrete barrier along the right of way line was built to the Broadway Interchange. Immediately prior to the advertisement of the Route 101 Widening Project, the design called for the
construction of the sound wall from the Broadway interchange proceeding south along Rollins Road. The sound wall at the time fronted commercial sites along Rollins Road who objected to the installation of the sound wall along their frontage. Their objections resulted in the removal of the sound wall from the Route 101 Widening Project and thus a concrete barrier instead of a sound wall fronts the Residential Project.

As the Residential Project was obtaining its entitlements in 2013, Glenn Kinoshita of Caltrans Noise and Air Quality Unit was contacted by the Residential Project to confirm if the proposed sound wall extension was acceptable. At that time, Glenn indicated that the proposal was acceptable but suggested that the proposed extended sound wall should complement the design and height of the existing sound wall. In order to comply with the request, the sound wall would stand 16-ft in height and consist of masonry blocks set on top of a concrete barrier with a cast-in-drilled pile foundation. When in late 2016/early 2017, the Residential Project was prepared to submit for an encroachment permit for the Sound Wall Project, Caltrans Encroachment Permit Department was contacted. At the time since the sound wall was proposed to be constructed within Caltrans’ right of way, the Permits Department informed the Project that Caltrans Right of Way and Design Units would have to be contacted and approval to proceed would be necessary.

SummerHill, BKF Engineers, and a representative from the City of Burlingame met with Caltrans on September 6, 2017 to discuss the Residential Project, Managed Lanes Project and respective timelines. At the time, the Draft EIR was not available and thus we did not have the opportunity to review the proposed Managed Lanes Project and its impacts along Rollins Road. It was agreed at the meeting the given that the best course of action would be to have the Managed Lanes Project include the construction of the sound wall along Rollins Road that fronted the Residential Project. This would be accomplished by either (1) the noise impacts resulting from the Managed Lanes Project would require the sound wall for noise abatement or (2) if this was not the case, construction funds for the sound wall would be provided by the Residential Project through a local agency (either the City or SMCTA). The local agency would have to enter into a Cooperative Agreement with Caltrans to outline the funding responsibility. As an action item from that meeting, Caltrans agreed to verify that the proposal for Caltrans to include the sound wall extension into the Express Lane Project if it is funded by a local agency is acceptable for which we have not yet received a response.

We have reviewed the Draft EIR and would like to submit the following comment:

18-1 It appears that the reasonableness allowance for the sound wall at Receptor ID S17 was based on benefiting 9 receptors. This number of receptors appears to be low based on the number of residential units that will be fronting and benefiting from the sound wall. We would like to know how this was evaluated and determined. Additionally, we would like to review the NADR.

18-2 After review and consideration of the above, should the sound wall cost fronting the Residential Project be determined to be financially infeasible by Caltrans as part of the Managed Lanes Project, in the best interest of the public is it acceptable for the sound wall to be funded by local funds via a local agency such as the City of Burlingame and constructed as part of the Managed Lanes Project?
Response to Comment Letter 18: Elaine Breeze, SummerHill Homes

The comment refers to receptor ID S17 (shown in Appendix C on sheet 45 of 59) at the future Carolan/Rollins residential project that would construct two-story townhome condominiums, and apartments in five-story buildings located between Carolan Avenue and Rollins Road. The U.S. Highway 101 Managed Lanes Project Noise Study Report (NSR) took this project into consideration when analyzing future predicted noise levels. According to the NSR (completed in October 2017) the Carolan/Rollins residential project area is approximately 120 feet south from the US 101 centerline. The nearest common outdoor use area of frequent human use of the proposed project would be approximately 300 feet from the US 101 centerline. Based on the modeled results from S17, this outdoor use area would have calculated future Build worst-hour noise levels of approximately 62 dBA Leq[h] without any shielding from the proposed building itself. This would be below the Noise Abatement Criteria (NAC) of 67 dBA Leq[h] for Activity Category B (residential noise-sensitive land use).

The comment suggests that the reasonableness allowance for the sound wall at Receptor ID S17 was based on benefiting 9 receptors. The reasonableness allowance calculation is based on three factors:

- The noise reduction design goal (a barrier must be predicted to provide at least 7 dB of noise reduction at one or more benefited receptors).
- The cost of noise abatement (reasonable allowance of $92,000 per benefited receptor).
- The viewpoints of benefited receptors (including property owners and residents of the benefited receptors).

The 9 benefiting receptors that the comment refers to in fact are not based on Receptor ID S17. According to Table 7-5 from the NSR shown below, S17 would not receive a noise reduction of at least 5 dB at any of the listed wall heights (from 8 feet to 16 feet). However, the other receptor IDs (S15, M15a, and M15b) would consist of a combined 9 benefiting receptors at all of the listed wall heights because New Barrier 20a would provide an insertion loss of at least 7dB for one or more receptor at S15, M15a, and M15b, and an insertion loss of at least 5 dB for the other receptors at these locations.

Table 7-5. New Barrier 20a – Rollins Road Residences, Burlingame (Alternatives 2, 3 & 4) – Assumes Existing or Replacement Wall at Barrier 20b is in Place

<table>
<thead>
<tr>
<th>Receptor ID</th>
<th>Units Represented</th>
<th>Noise Level w/o Wall</th>
<th>With Wall H=8 feet</th>
<th>With Wall H=10 feet</th>
<th>With Wall H=12 feet</th>
<th>With Wall H=14 feet</th>
<th>With Wall H=16 feet</th>
</tr>
</thead>
<tbody>
<tr>
<td>S15</td>
<td>1</td>
<td>73</td>
<td>68</td>
<td>5</td>
<td>67</td>
<td>6</td>
<td>66</td>
</tr>
<tr>
<td>M15a</td>
<td>1</td>
<td>77</td>
<td>69</td>
<td>8</td>
<td>68</td>
<td>9</td>
<td>67</td>
</tr>
<tr>
<td>M15b</td>
<td>7</td>
<td>80</td>
<td>70</td>
<td>10</td>
<td>69</td>
<td>11</td>
<td>66</td>
</tr>
<tr>
<td>S17</td>
<td>2</td>
<td>68</td>
<td>68</td>
<td>0</td>
<td>67</td>
<td>1</td>
<td>66</td>
</tr>
</tbody>
</table>

Per 23 CFR 772, for activity category B (residential) the evaluation location is the exterior of the residence that is frequently used. For modeling purposes, the receptor should be placed at the primary outdoor use area of the dwelling unit. This is typically the backyard of a single family dwelling or patio/balcony of a dwelling unit in a multi-family building. Multi-family and residential community common areas may include pools, ball courts, or other formalized outdoor activity areas. Each of these formalized outdoor activity areas must be counted as one receptor. In addition, a sound wall would not provide noise reduction of 5 dB or higher (i.e. be acoustically feasible) at the second story and no reduction at the third story and up because the wall would not break the line-of-sight between receptors and the freeway. Therefore, the number of residential units in the building do not equate to the total number of receptors, rather it is the primary outdoor use area that would benefit from the sound wall.

New Barrier 20a was evaluated in the Noise Abatement Decision Report because it met the noise criteria under 23 CFR 772 (the results are shown in Table 2.2.7-6 of the EIR/EA). However, none of the wall heights for Barrier 20a would have an estimated construction cost below the total reasonable monetary allowance. Therefore, this new barrier was not recommended for construction as part of the project.
The NSR, NADR, Revised NADR, and Second Revised NADR are available for review at the Caltrans District 4 Offices. Please contact Yolanda Rivas at 510-286-6216 or Yolanda.Rivas@dot.ca.gov for more information or to obtain a copy.

18-2

As noted in Table 2.2.7-6, the construction cost of the new sound wall 20a would exceed the reasonableness allowance and would therefore be financially infeasible to be funded by Caltrans. The funding of the new sound wall would then be at the discretion of another entity, such as the SummerHill developer or a local agency. Caltrans could coordinate with an outside group should private funding be made available. However, Caltrans does not have the authority to decide which entity would fund a new sound wall.
Comment Letter 19: Isa Gaillard, TransForm

U.S. Highway 101 Managed Lanes Project
PUBLIC MEETING AND OPEN HOUSE
January 11, 2018

Comment card may be placed in the comment box tonight, or mailed or e-mailed no later than January 19, 2018 to:

Department of Transportation, District 4
Attn: Yolanda.rivas@dot.ca.gov
P.O. Box 23660, MS 8B
Oakland, CA 94623-0660
E-mail: sm101DEIR_EA_comments@dot.ca.gov

Name: Isa Gaillard
Affiliation: TransForm
Address: 436 14th St, Oakland, CA 94612
E-mail Address: igaillard@transformcac.org

Comment(s): According to the DEIR, delays & total vehicle travel skyrocket with or without the project. Does spending a half a billion dollars on this project make sense? How could our money be better spent on moving more people using fewer vehicles?
Response to Comment Letter 19: Isa Gaillard, TransForm

A major purpose of the proposed project is to increase person throughput by moving more people along the corridor. This increases the number of vehicles within the US 101 corridor because it encourages travelers from local streets and parallel routes to use US 101. The project would move more people with the express lanes and also improve travel time reliability for buses and HOVs, which would provide more incentive to carpool. The project’s investment in providing a carpool option in the managed lanes would provide an incentive to combine trips (such as carpools, vans, or buses) to save travel time. The comment is correct in that between 2020 and 2040, traffic delays and volumes are forecast to increase (with or without the project), but not evenly throughout the corridor. Delays would be more pronounced during certain commute periods. The highest increases without the project will be northbound and southbound between San Antonio Road and Marsh Creek Road after 9AM, and southbound between I-380 and Whipple Avenue.

The comment describes increasing delays under both the Build and No Build Alternatives, and raises the question of if the project is worth funding. By selecting the No Build Alternative, the project corridor would not experience any improvements, or any incentive to carpool and use buses. The proposed project stands as one component of a much larger overall approach to the proposed solutions for the Bay Area’s transportation system, described in Plan Bay Area 2040, the regional transportation plan. The proposed project on its own would not be able to improve all traffic issues facing the region, but would meet the purpose and need stated in Section 1.3.
Comment Letter 20: Joel Ramos, TransForm

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:

1. 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.
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. 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:
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 158,378 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 carpools, 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:
   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 complement 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,

Joel Ramos  
Regional Planning Director
Response to Comment Letter 20: Joel Ramos, TransForm

20-1

The commenter's support for the project feature is noted. Section 1.4.1.2 describes the transaction process that is proposed for HOVs with 3 or more occupants, HOVs with 2 occupants, and SOVs.

20-2

The comment indicates that the project would induce demand, citing higher delay times on US 101 with the Build Alternative. Delay times with and without the project are addressed in the response to Comment 11-1. The figures provided in the comment depict travel time data for specific directions, travel times, and analysis years from Appendix D for the general purpose lanes and do not represent overall project results. As discussed further in the response to Comment 6-4, the Build Alternative would increase person throughput compared to the No Build Alternative. The Build Alternative would also provide an incentive for travelers to shift to carpooling and buses due to the priority for HOV’s in the managed lanes, and improved travel time reliability. The traffic study showed that traffic that currently diverts to circuitous or parallel routes would shift back onto US 101, which would not occur with the No Build Alternative.

20-3

This comment is addressed in the response to Comment 11-1.

20-4

This comment is addressed in the response to Comment 11-2.

20-5

This comment is addressed in the responses to Comments 11-3 and 11-4.

20-6

Please see the response to Comment 11-5 and 11-7.
Comment Letter 21: David Schonbrunn, Transportation Solutions Defense and Education Fund (TRANSDEF)

Transportation Solutions Defense and Education Fund
P.O. Box 151439  San Rafael, CA 94915  415-331-1982

January 19, 2018
By E-Mail to:
sm101DEIR_
EA_comments
@dor.ca.gov

Yolanda Rivas
Office of Environmental Analysis
Department of Transportation, District 4
P.O. Box 23880 MS 8B
Oakland, CA 94623-0880

Re: U.S. Highway 101 Managed Lanes Project DEIR

Dear Ms. Rivas:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental organization focused on reducing the climate impacts of transportation. We offer the following comments explaining why the U.S. Highway 101 Managed Lanes Project DEIR ("DEIR") is grossly inadequate under CEQA. Page citations are to the DEIR unless otherwise noted.

21-1 This DEIR marks a new low in Caltrans' compliance with CEQA. The DEIR employs a novel format that omits any discussion of the significance of the identified impacts, or disclosure of the thresholds of significance. The Alternatives Analysis eliminated all the alternatives from the study. And to top it all off, the DEIR outright refuses to characterize the significance of the project's impact on GHG emissions. Clearly, someone at Caltrans has directed the agency to aggressively minimize its compliance with CEQA. We believe they've underestimated the public's unwillingness to have the State's premier environmental law flouted.

21-2 The DEIR--and the agency that prepared it--stubbornly refuse to acknowledge the climate emergency. People are now dead in Montecito due to the extreme precipitation directly caused by climate change. In this DEIR, Caltrans rejects all responsibility to comply with State policies adopted in response to climate change. The Caltrans staff working on this DEIR, and the senior management directing them to ignore climate change, are morally—if not criminally—responsible for those deaths. History will look back on Caltrans' intransigence as one of the major stumbling blocks preventing California from achieving its climate goals.
It is clear from CalSTA's SSTI report\(^1\) that Caltrans' historic role as highway builder needs to come to an end. This DEIR thumbs its nose at the very thought that Caltrans will ever change.

**Scoping Comments**

TRANSDEF submitted a detailed NOP comment letter on November 18, 2016 (attached). However, there is no mention of our letter in the matrix of scoping comments in Section 4.1 of the DEIR, nor is there any indication that any of our comments influenced the analysis.

**Project Purpose**

The various purposes cited for the project suffer from internal conflict and/or impossibility:

> ... to reduce congestion in the corridor, encourage carpooling and transit use, provide managed lanes for travel time reliability, minimize operational degradation of the general purpose lanes, increase person throughput (the number of people moved), and apply technology and/or design features to help manage traffic. (page i.)

The environmentally benign purposes (encouraging carpooling and transit use) are consistent with increasing person throughput. An uncongested HOV lane presents the ultimate motivation for solo drivers stuck in traffic to find someone to carpool with, thereby reducing Single-Occupant Vehicle ("SOV") travel demand. Allowing SOVs to buy into the excess capacity of a managed lane eliminates all motivation to tackle the discomfort and unfamiliarity of shifting modes. Managed lanes therefore stand in direct conflict with the environmental purposes already cited.

In addition, raising the occupancy standard from 2+ to 3+ makes carpooling exponentially more difficult, also standing in direct conflict with the environmental purposes. We assert that the Managed Lanes proposal is a cynical move to operate a toll lane, while preserving carpooling in name alone. We note the inherent conflict between the financial rewards of tolling SOVs and the promotion of carpooling. Why would an agency spend money to reduce their revenues? The incentives are backwards for achieving the reduction in VMT called for by State law and public policy.

The following statement claims that the proposed project continues to facilitate transit and ridesharing:

Traffic Systems Management (TSM) strategies increase the efficiency of existing facilities by accommodating a greater number of vehicle trips on a facility without increasing the number of through lanes. TSM encourages transit use and ridesharing, which the proposed project would continue to facilitate. The project would increase the efficiency of US
101 by allowing more vehicles to travel within this corridor while minimizing expansion of the freeway. (page 1-22, emphasis added.)

There is no tangible evidence that Caltrans does anything now to facilitate transit and ridesharing. The argument immediately above explains how the proposed project will discourage transit or ridesharing. It's also clear that by allowing SOVs into the new lane, the proposed project is suboptimal in terms of increasing the efficiency of the highway. The project purpose is to increase person throughput: to have more people in fewer cars to reduce congestion, not more cars with slightly more people in them.

The Build Alternative would support transit service by allowing buses to use a lane that has reduced delays in comparison to the general purpose lanes. (page 3-25.)

Caltrans has made no efforts to-date to operate HOV lanes in a manner "that has reduced delays in comparison to the general purpose lanes." It neither makes HOV lane hours of operation cover all periods in which the general purpose lanes are congested, nor pays to have CHP enforcement of occupancy standards. Current HOV lanes in the Bay Area have been cited by FHWA as non-compliant with federal standards for HOV lane average speeds. It is clear that allowing buses into lanes that are managed for the benefit of SOVs is about the weakest form of support for transit service imaginable. See the SB 743 section below for examples of what real support looks like. Please delete the quoted statement, as it is untruthful.

Reducing congestion in an unpriced corridor is a fantasy. It's widely recognized that congestion is a fact of life for a transport system as heavily dependent on the personal automobile as the Peninsula is. See Road Pricing section, below.

"Apply[ing] technology and/or design features to help manage traffic" is not a project purpose. It is a means to achieve a purpose. As discussed below, the only thing this technology does is meter the number of SOVs allowed to enter the Express Lane. The purpose of the technology is to provide a consistent travel time advantage, not to use the technology itself.

Traffic Model Outputs
As we stated in our scoping comments, the model employed in the preparation of the DEIR has flaws that constrain its validity.

Table 3.2-2 (p. 3-27) shows that even with a 21.8% increase in VMT over an already heavily congested highway, average 2040 vehicle speeds barely budge from current ones. This is physically impossible. It is clear the model is producing erroneous outputs. Part of the problem is the failure to specify average speeds during peak periods. Average daily speeds, which include off-peak periods, are meaningless. Since the annual emissions are a function of speed, the data presented by this table are worthless in answering the question of whether the project causes an increase in GHG emissions.
Because a state-of-the-art model was not used, the traffic projections and claimed future benefits are highly dubious. In particular, the question of "How long will those benefits continue?" has not been answered. Highway widening projects typically become congested within five years, begging a question the DEIR chose not to ask: "What's the long-term solution?" It is obvious to observers outside Caltrans that the answer is to shift public investment over to transit modes, and start putting a price on road travel, when adequate transit alternatives are available.

A related unanswered question is whether the project benefits will ever offset the congestion delays. Many projects, scandalously, never provide a net benefit.

Impact Analyses
Unlike all other EIrs that TRANSDEF has studied, the DEIR fails to provide a CEQA significance discussion within each impact analysis section of Section 2 of the DEIR. Instead, a CEQA Checklist is presented in Section 3.1. Because the CEQA Checklist is the work product of an Initial Study, it logically cannot be the disclosure document of significant impacts found in an EIR. (See CEQA Guidelines §15126.2, Consideration and Discussion of Significant Environmental Impacts.) The State regulatory setting is missing from most analyses. Thresholds of significance need to be discussed for each impact analysis section.

Table 2.1.2-1 (page 2-8) is incorrect in claiming consistency with local plans that call for HOV lanes. As discussed above, the purpose of HOV lanes is to encourage carpooling. Managed Lanes have the overall effect of discouraging carpooling. It is fallacious to claim that HOT lanes are interchangeable with HOV lanes.

It is grossly untrue that "The Build Alternative would not remove obstacles to development." (page 2-14.) The Peninsula is currently choking on traffic. That certainly is an obstacle to development. We frequently hear of locally grown businesses choosing to expand in locations outside the Bay Area. The business lobby routinely pronounces dire warnings that the economy will be harmed, and growth will cease if the public doesn't pay to "fix" the traffic situation.

The CEQA Checklist asserts that the project has a less than significant impact on Transportation/Traffic. The "Less Than Significant Impact" assessment of the following item is incorrect:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (page 3-15, emphasis added.)
The proposed project is utterly inconsistent with internal Caltrans policy:

Going forward, efforts to fulfill our LD-IGR obligation should consider multimodal solutions from existing plans like regional transportation plans, general plans, transit plans, bicycle plans, and pedestrian plans. Multimodal solutions to not only improve access to destinations for all system users (motorists, transit riders, bicyclists, pedestrians), but also encourage efficient land use that helps achieve the multitude of goals sought, including quality of life, economic prosperity, the development of multimodal networks, and GHG emissions reduction.³

By year 2020, the SMP [Caltrans Strategic Management Plan] calls for several specific targets related to the LD-IGR program:

- a doubling of walking and transit, and tripling of bicycle trips as a percentage of overall trips
- a reduction of per capita vehicle miles traveled (VMT) by 15%
- a reduction of the number of fatalities in each travel mode by 10% a year⁴

The projected VMT increase of 21.8% (derived from Table 3.2-2, page 3-27) is clearly inconsistent with the SMP targets. The DEIR improperly makes no finding of policy inconsistency.

**GHG Impact Analysis**

The DEIR refuses to answer the Initial Study checklist questions pertaining to greenhouse gas emissions ("GHGs"), and provides instead meaningless platitudes. No one is fooled by this response:

Caltrans has used the best available information based to the extent possible on scientific and factual information, to describe, calculate, or estimate the amount of greenhouse gas emissions that may occur related to this project. The analysis included in the climate change section of this document provides the public and decision-makers as much information about the project as possible. It is Caltrans' determination that in the absence of statewide-adopted thresholds or GHG emissions limits, it is too speculative to make a significance determination regarding an individual project's direct and indirect impacts with respect to global climate change. Caltrans remains committed to implementing measures to reduce the potential effects of the
project. These measures are outlined in the climate change section that follows the CEQA checklist and related discussions. (page 3-8, emphasis added.)

In fact, Caltrans cannot point to any Project-Level GHG Reduction Strategies (page 3-30) that reduce the GHG emissions from the vehicles using the proposed project in any meaningful amount. (The support given to ridesharing is minimal, and has been reduced in recent years. The program is so tiny that it has an insignificant effect on mode shift.)

The current Initial Study Checklist (Form G)\(^5\) is definitive in requiring significance determinations to specific questions:

\[ \text{VII. GREENHOUSE GAS EMISSIONS -- Would the project:} \]

\[ a) \text{ Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?} \]

\[ b) \text{ Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?} \]

The DEIR for MTC's 2017 Regional Transportation Plan, Plan Bay Area, analyzed the following impacts for significance:

\[ \text{Impact 2.5-2: Implementation of the proposed Plan could result in a net increase in direct and indirect GHG emissions in 2040 when compared to existing conditions.} \]

\[ \text{Impact 2.5-3: Implementation of the proposed Plan could substantially conflict with the goal of SB 32 to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030.}^{6} \]

The DEIR failed to offer any explanation as to why Caltrans is exempt from providing the same analysis as MTC. The DEIR failed to evaluate the consistency of the project with SB 32:

\[ \text{Senate Bill 32, (SB 32) Chapter 249, 2016, codifies the GHG reduction targets established in EO B-30-15 to achieve a mid-range goal of 40 percent below 1990 levels by 2030.} \]

\[ \text{(page 3-22.)} \]

The DEIR analysis totally misses the point: The merely slight decrease in 2040 GHG emissions compared to the present (Table 3.2-2, page 3-27) impedes the State's SB 32 emissions reduction goal of 40 percent. The DEIR must make a finding of a significant and unavoidable impact. The large increase in VMT impedes the attainment of that state goal and represents a failure of transportation planning.
In SANDAG v. Cleveland National Forest Foundation, a case of nondisclosure of CEQA impacts that parallels the shortcomings of this DEIR, the Supreme Court stated:

Nevertheless, we do not hold that the analysis of greenhouse gas impacts employed by SANDAG in this case will necessarily be sufficient going forward. CEQA requires public agencies like SANDAG to ensure that such analysis stay in step with evolving scientific knowledge and state regulatory schemes.7

The DEIR presents no substantial evidence for its claim that "it is too speculative to make a significance determination..." The very fact that other agencies do make CEQA significance determinations is conclusive that the claim is invalid.

An accurate assessment of construction emissions must include the lifecycle emissions of construction materials, including cement, steel, asphalt, etc. The DEIR did not provide enough information to verify that this was done.

Alternatives Analysis
The Alternatives Analysis has long been recognized by the courts as one of the most important elements of environmental review. The DEIR turns the CEQA process on its head by essentially eliminating the alternatives analysis. Rather than fully informing the public as to the costs and benefits of a set of alternatives, the DEIR discards them all without identifying any as infeasible, leaving only its preferred Build alternative.

The primary purpose of CEQA is full public disclosure. This enables the public to check the math, review the analysis and evaluate the assumptions of the project sponsor, so that the project documentation is fully informed by public scrutiny. Caltrans made impermissible decisions outside the DEIR proper:

Several alternatives were considered during the early stages of project development but were eliminated because they would not meet the project’s purpose and need and would on balance have greater environmental effects compared to other alternatives. (page 1-24.)

The tradeoff determination is precisely the kind of analysis that CEQA mandates be made publicly in the analysis presented in an EIR. It is not to be performed prior to the EIR. Numerous CEQA precedents require a project sponsor to consider alternatives that fulfill most, but not all, of the project’s purpose and need, when considered in the context of reduced environmental impacts. Nothing in CEQA supports the pre-EIR elimination of feasible alternatives. At a minimum, the statements in Section 1.4.5.2 HOV 2+ – Add a Lane Option (Alternative 2) and Section 1.4.5.3 HOT 3+ – Convert a Lane Option (Alternative 3) need to be the conclusions reached after having carried these as full alternatives, so that all the work that led to these conclusions is presented to the public.
The assertion that HOV lanes “limit the ability to apply traffic demand management measures in the future” (page 1-26) is not only misleading, it is flat-out incorrect. HOV lanes regulate the number of toll-paying SOVs to zero. The only management of traffic detailed in the Project Description is the following:

The express lane operator will utilize management measures including dynamic toll pricing to regulate the number of toll-paying SOVs using the express lanes in order to manage performance of the lanes. (page 1-21.)

Road Pricing
Extensive research and analysis on road pricing has shown that:

Pricing is a particularly promising policy tool to reduce VMT and associated GHG emissions, for two reasons. First, the effect size from pricing interventions to VMT is larger than the effect size for other policy or planning tools. Second, pricing can be applied to a broad base, and state action can be particularly effective here. In other words, pricing can achieve a broad strategy extent quickly. Recall that the effect of a policy is the effect size (e.g. the amount that a driver’s VMT would be reduced if the policy were applied to that driver) multiplied by the number of drivers exposed to the policy.8

As is discussed in the SB 743 section below, highway widening tends to increase VMT and its associated GHG emissions, thereby reducing or eliminating the short-term congestion benefits. If Caltrans truly wishes to reduce congestion, the only tried and true method of accomplishing that for the long term is to toll the highway. While that may require a formal waiver by FHWA or Congress, the new Administration in Washington is said to be open to the idea of road tolls on interstate highways.

A Pricing Alternative should be studied in the revised DEIR. It would achieve a significant reduction in congestion without any environmental impacts. The revenues generated would fund non-SOV alternatives, and have an equity component to mitigate impacts on lower-income residents. With the continuing increases in VMT3 despite SB 375,10 it is now fairly clear that tolling will be required if California is to achieve its climate targets.

TRANSDEF Alternative
To surmount the problems identified in the analyses that resulted in these alternatives being rejected, TRANSDEF has created its own alternative that we request be studied in the Revised DEIR: HOV 2+ Convert a Lane Plus Add a Lane. To fully utilize the new facilities, this Alternative includes two operational elements: a well-funded express buses deployment and a strong promotional campaign encouraging smartphone-based ridematching.
The two HOV lanes will provide adequate capacity for the carpoolers identified by the travel model, as well as offer capacity for those motivated by the campaign, by the free-flow of traffic, and by its accompanying travel time advantage, to shift modes. When VTA sees the outcome of the study in the revised DEIR, it may well decide to modify its HOT lanes project to be compatible with it.

Because the travel model cannot evaluate the effectiveness of a proposed public campaign, this alternative will need an off-model adjustment which assumes that the campaign adds 5 percentage points to the carpool mode share. A sensitivity test should also calculate the impacts of a 10-percentage point addition to the mode share, to indicate what success looks like. This alternative conveys a strong message to the public that "To Not Be Stuck in Congestion, Sharing is Necessary." It's a form of "Eat your broccoli--you may not like it at first, but it's good for you."

SB 743
Caltrans was highly aware of the significance of SB 743 before developing this DEIR, as demonstrated in a 2016 Caltrans internal guidance citing a review of Caltrans practices commissioned by the California State Transportation Agency (CalSTA):

Their January 2014 report stated that “SB 743 could do more to advance state planning goals than anything else Caltrans has done”, and “would put California and Caltrans back at the leading edge of modern transportation practice ..... It would begin to make Caltrans a real contributor to the success of modern policy in the state, and it would provide a model for how the staff could help implement a challenging new charge.” (emphasis in original)\(^\text{11}\)

Despite this apparent buy-in by management, the DEIR completely ignored SB 743, even though OPR announced VMT would be the likely replacement transportation major metric long before this project's NOP. Not only did it not evaluate the CEQA significance of the increase in VMT, the DEIR failed to evaluate the increase in VMT as an impact at all. To be consistent with Caltrans' internal policy, the DEIR should have started evaluating VMT when OPR first issued its draft Guidance.

TRANSDEF asserts that the proposed project and its DEIR obstruct the implementation of state policy:

Under current practices, the VMT-inducing potential of these [state highway widening] projects is not generally accounted for in the decision-making process. Such analyses could very well show that state investments in highway capacity are at odds with state goals for reducing GHG emissions.\(^\text{12}\)

It is disturbingly hypocritical and a failure to maintain consistent policy that Caltrans does not apply the same criteria to its own proposed project that it applies in reviewing local development projects:
TAG-TISG focuses transportation analysis on VMT impacts, assessing impacts from growth plans and development projects on the multimodal transportation network, and quantifying VMT and GHG reductions achieved through smart mobility principles and Transportation Demand Management (TDM) strategies.

Rather than providing recommendations that primarily accommodate motor vehicle travel, provide recommendations that strive to reduce VMT generation; improve pedestrian, bike, and transit service and infrastructure; and which don't induce additional VMT. (emphasis in original.)

There was no table identifying mode shares for the various alternatives and various time horizons. The trending pattern of mode share is a key indicator of public policy effectiveness. An SOV mode share that hasn't decreased sharply at the plan horizon is determinative of a policy failure.

Disclosure of Impacts
The DEIR fails to adequate disclose, in terms understandable by the average citizen, the magnitude of the disruption to everyday life that is projected for both the Build and No Build Alternatives.

Travel time will more than double. (Table 3.2-1, page 3-26.) While TRANSDEF finds it difficult to believe that traffic will be able to move at all in 2040, the public needs to be informed how painful commuting by car will be in the future. The slowing down of travel (which is not consistent with the average speeds in Table 3.2-2 on page 3-27) is highly significant to the public, but is left buried in technical reporting. Neither the Build nor the No Build Alternative will lead to an acceptable future. That finding should have resulted in the search for significantly different alternatives.

Recirculation
The many CEQA flaws identified herein require that the DEIR be revised and recirculated to allow the public to comment on a legally adequate document.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

TRANSDEF 1/19/18 Page 11

Attachment:
TRANSDEF's SM 101 Managed Lanes Project Scoping comments letter, November 18, 2016

Copies
Steve Heminger, MTC
Bijan Sartipi, District 4
San Mateo Board of Supervisors
Board of Directors, C/CAG
Board of Directors, Samtrans
Senator Jerry Hill
Assemblmeember Kevin Mullin
Assemblmeember Marc Berman

4 id.
5 Available at http://www.cpuc.ca.gov/ceqa/
6 page ES-22.
7 SANDAG v. Cleveland National Forest Foundation, S223603, Slip Opinion at 3.
12 A Framework, page 33.
13 Local Development, page 5.
Note: The following is a comment letter submitted to Caltrans by the Transportation Solutions Defense and Education Fund during the public scoping period. The letter is not a comment on the Draft EIR/EA and therefore response is not required; however, see Table 4.1-1 in Section 4.1 of the Final EIR/EA for a summary of how the comments were considered.

Transportation Solutions Defense and Education Fund
P.O. Box 151439  San Rafael, CA 94915  415-331-1982

November 18, 2016
e-mail to: sm101scoping
@dot.ca.gov

Yolanda Rivas
Caltrans Office of Environmental Analysis
P.O. Box 23660
Oakland, CA 94623-0660

Re: SM 101 Managed Lanes Project Scoping comments

Dear Ms. Rivas:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental organization focused on reducing the climate impacts of transportation. Because of that focus, it is our duty to inform you that the proposed SM 101 Managed Lanes Project ("Project") is inconsistent with the State of California’s climate policies to reduce greenhouse gas emissions.

With motor vehicles contributing about half of the state’s emissions (when fuel production, vehicle manufacture and tailpipe emissions are all counted), the California Transportation Plan 2040 recognized the need to move away from this type of project, precisely because they do not offer long-term solutions. (See the attached Excerpts of CTP 2040.)

Data tell us that we must look at solving congestion in a more holistic way. Simply adding more lanes and roads will not be enough. It must be coupled with new approaches that look less at specific projects and more at improving corridors; that look less at analyzing how many cars we can squeeze through a segment of highway and instead look at how we can reliably move people to their destinations.

Highway and road investment alone will neither solve our congestion problems nor provide the mobility options Californians want. (CTP, page 8.)

The Fundamental Problem
The genesis of this project, and all others like it, is the universality of the expectation that it should be possible to drive alone during commute periods. When looked at from the standpoint of transportation around the world, this is nothing short of a mass fantasy. It will never be possible to provide enough capacity to accommodate user
demand for single-occupant vehicle (SOV) peak period travel. The cost and environmental impacts would be overwhelming. A supply-side approach to highway capacity is thus bound to fail. "You can't build your way out of congestion." There is no point to even trying to meet demand. The only viable option is a demand-side approach.

While the Project Meeting Notice is correct that “finding a solution to the growing congestion and associated delay has become a high priority,” there is no long-term solution to be found amongst projects like the Managed Lanes Project. Los Angeles has already thoroughly tested the supply-side approach and found only endless congestion. It is thus certain that the proposed Project will fail to meet the project goal to "Reduce congestion in the corridor." Los Angeles, sharing that same goal, has shifted the focus of its infrastructure investments to rail.

There are already far too many solo drivers clogging the roadways. The root cause of congestion is too many solo drivers. The Project would thus make the problem worse, because Managed Lanes encourage drivers to continue to drive solo (because the principal outcome of Managed Lanes is increased capacity for solo driving). The Project signals social support for continued solo driving, at the very time when a change in societal expectations is desperately needed.

It is time to acknowledge that drive-alone cannot continue to be the primary mode of commuting in large metropolitan regions. The only realistic way to meet the needs of large numbers of people that seek to travel at the same time is with mass transit.

The only long-term “solution” for the 101 Corridor would be a doubling or tripling of the capacity of Caltrain. Unfortunately, Caltrain's management has not recognized the need to do so, and is distracted by an extremely expensive electrification project that will do little to increase capacity. The electrification EIR shows Caltrain completely out of capacity by 2040. TRANSDEF joined a challenge of that EIR for that reason.

Induced Demand
Research done for the California Air Resources Board provides a basis for estimating the impacts of road expansion projects on future VMT and GHG. Susan Handy and Marlon Boarnet reviewed the literature on induced travel and concluded: “Thus, the best estimate for the long-run effect of highway capacity on VMT is an elasticity close to 1.0, implying that in congested metropolitan areas, adding new capacity to the existing system of limited-access highways is unlikely to reduce congestion or associated GHG in the long-run.”
http://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf

By building new Express Lanes on US 101 between Whipple Road and the I-380 interchange, the Project will definitely increase VMT and GHG emissions. This is contrary to Executive Order B-30-15, which commands Caltrans, as a state agency, to give "Priority [] to actions that both build climate preparedness and reduce GHG emissions.” Along these same lines, CTP 2040 said:
Today's environmental objectives, in the era of climate change, are more challenging than they have been in the past. While the transportation system must continue to meet demand for reliable travel, it must do so while achieving quantifiable reductions in greenhouse gas (GHG) emissions.

The EIR/EIS should evaluate consistency with CTP 2040, and whether the Project will impede the attainment of the state's emissions reduction goals of reducing GHGs by 40% by 2030 and 80% by 2050. Evaluate whether proceeding with a highway-oriented solution will encourage future auto-oriented development vs. the alternatives suggested below, and whether the latter encourage transit-oriented development.

Norman Marshall of Smart Mobility Inc. studied the latest travel demand models for ARB and concluded that:

Demonstration that the Travel Demand Model properly accounts for induced demand is of the utmost importance in proper accounting of roadway performance metrics and GHG. This requirement is more critical than many of the other [Regional Transportation Plan Guidelines] recommendations including the recommendation for Activity-Based Models (ABMs).

In my detailed review of the California ABMs done for the Air Resources Board, I found that the current ABMs fail to account for induced travel any better than the older trip-based models. ...

The large increases in population forecast throughout California cause the future static assignment models to forecast impossibly high traffic volumes, especially on freeways. This problem makes all future estimates of VMT, VHT and GHG invalid. Added freeway capacity always shows benefits in static assignment models even though research has shown that there likely are no benefits. Replacing static assignment with dynamic traffic assignment (DTA) or microsimulation is recommended.

The long-term goal of modelers has been to marry ABM with microsimulation. Microsimulation likely is still impractical (at least in the larger regions), and the travel demand models are still relying on a 50-year old algorithm implemented when computers were much less powerful. DTA offers a practical middle ground for much more realistic estimation of induced travel and roadway metrics that can be implemented today.
Caltrans is now on notice of serious shortcomings in its travel model. Past generations of models produced outputs that convinced the state to expend hundreds of billions of dollars on highway expansion projects like the proposed Project. After short respite from congestion, each of these roadways soon filled up again, clearly indicating serious flaws in the traffic projections.

These flawed traffic model projections led to massive roadway investments that provided no long-term benefits. Now that the academic research can explain the source of the modeling failure, it is incumbent on Caltrans to change its modeling to be consistent with current research. Unless induced demand is accurately captured, modeling will provide the same wrong answers, wasted investments, and a public that continues to think that driving alone is how transportation is supposed to work.

Clean Air Act
As a region in nonattainment of the federal ozone standard, discuss the legal constraints imposed by the Clean Air Act, and subsequent amendments, on allowing single-occupant vehicles into an HOV lane, and on building new mixed flow lanes. (A so-called Managed Lane is legally a mixed flow lane.)

Caltrain Alternative
Model an alternative with three times the number of seats per peak hour as are currently being provided. Assume the shifting of the proposed Project’s funding into Caltrain operations funding. To have the proper “color of money,” swap the funds with a sales tax agency engaged in federally eligible projects. Please focus the EIR/EIS analysis on the air quality, climate change and transportation impacts. Do not expend effort on designing the infrastructure needed to deliver that level of service.

TDM/HOV Alternative
TRANSDEF is unaware of any serious effort ever having been made by Caltrans to operate its HOV lanes to encourage carpooling. As part of the EIR/EIS Existing Conditions analysis, include a discussion of the DOT evaluation of Highway 101 compliance with HOV lane minimum speed requirements.

TRANSDEF proposes that the EIR/EIS study a Transportation Demand Management/HOV (TDM/HOV) Alternative that would encourage carpooling. This Alternative would include the following elements: rigorous and ongoing enforcement of HOV occupancy rules; HOV operational hours that cover all routinely congested time periods; and heavy promotion of smartphone apps that connect potential carpool partners in real time.

In place of the proposed newly constructed lanes, model the conversion of a mixed flow lane to create a continuous HOV lane throughout San Mateo, San Francisco and Santa Clara Counties. In addition, include the conversion of a mixed flow lane into HOV-2 for the entire length of I-280 in the three counties. This alternative will test the potential for a very large mode shift to carpooling and transit.

For purposes of studying this alternative, assume that the laws and regulations governing such conversions have been amended to permit it. It is only after the potential
benefits of conversions have been demonstrated that it will be possible to change the laws. (This project prerequisite would be identified in the Statement of Overriding Considerations as the responsibility of another agency, the Legislature.)

Conclusion
TRANSDEF recognizes the difficulties faced by Caltrans in entering an era that requires low-carbon lifestyles. We appreciate this opportunity to comment on the scope of environmental review for this project, and on its policy context. We would be pleased to assist in the preparation of the suggested alternatives.

Sincerely,

/is/ DAVID SCHONBRUNN

David Schonbrunn,
President
David@Schonbrunn.org

Attachments:
Excerpts from CTP 2040

CC:
Bijan Sartipi, Caltrans
Ken Kirkey, MTC
San Mateo Board of Supervisors
Sandy Wong, C/CAG
Jim Hartnett, SMCTA
Excerpts from CTP 2040

The following key quotes from the CTP capture the essential points of the systemic change it seeks to catalyze. TRANSDEF is strongly supportive of this direction.

Page 8: Today’s environmental objectives, in the era of climate change, are more challenging than they have been in the past. While the transportation system must continue to meet demand for reliable travel, it must do so while achieving quantifiable reductions in greenhouse gas (GHG) emissions. ...

While local, state and federal governments have poured billions of dollars into improving our roads and freeways to accommodate growth, congestion remains as vexing a problem in California today as it was decades ago. It is time to pursue new strategies to combat this problem.

Data tell us that we must look at solving congestion in a more holistic way. Simply adding more lanes and roads will not be enough. It must be coupled with new approaches that look less at specific projects and more at improving corridors; that look less at analyzing how many cars we can squeeze through a segment of highway and instead look at how we can reliably move people to their destinations. Highway and road investment alone will neither solve our congestion problems nor provide the mobility options Californians want.

Page 9: [AB 32 and SB 375] represent a shift in long-term planning away from simply a list of transportation projects and toward a strategy for sustainable growth.

Page 11: The CTP recommendations provide a framework and guiding principles for transportation decision makers at all levels of government and the private sector.

Page 25: Sustainable practices will help achieve the ambitious goal of stabilizing climate as well as meeting the requirements of the Federal Clean Air Act, but will require a fundamental, holistic transformation of the transportation system. ...

• Increase a shift to more sustainable transportation modes (mode shift) to reduce per capita vehicle miles traveled (VMT) ...

• Reduce the number of petroleum powered vehicles from California roads, and replace with zero- to near-zero equipment and modes of travel throughout the State

Page 27: ...and utilize a variety of adaptation strategies [to sea level rise], including managed retreat and other nature-based approaches ... To achieve adaptation strategies, SLR impacts must be addressed at all project planning stages, not just at final project delivery.

Page 28: ... CTP 2040, a guide to transportation decision-making in this era of climate change.
Response to Comment Letter 21: David Schonbrunn, Transportation Solutions Defense and Education Fund (TRANSDEF)

21-1

This is an introductory comment that summarizes more detailed comments that follow. Responses are provided for the detailed comments below.

21-2

CEQA requires a lead agency to make a good-faith effort to identify impacts and gives the lead agency discretion on the approach to analyze impacts. Caltrans used the best available modeling data (EMFAC 2014) to analyze greenhouse gas emissions related to the project and disclosed those projected emissions for both construction and operations activities within the draft document.

However, to further address the concerns raised in this comment and similar comments, portions of the Draft EIR/EA were recirculated for public review from July 10 to August 9, 2018. The Recirculated Partial Draft EIR/EA provided additional information and clarification on the following:

- The basis for the conclusions in the Alternatives Considered but Eliminated from Further Discussion section, including a new appendix (Appendix H);
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

- Potential effects of the proposed project to Water Quality and Storm Water Runoff and to Climate Change;
- The regional regulatory setting, quantitative analysis, CEQA significance criteria, and project-level GHG reduction strategies for Climate Change; and

The revisions from the Recirculated Partial Draft EIR/EA have been incorporated into the corresponding sections of the Final EIR/EA.

Section 3.1 of the Final EIR/EA has been revised to include additional information about the regional regulatory setting, quantitative analysis, CEQA significance criteria, and project-level GHG reduction strategies for Climate Change.

The project's reduction in 2020 and 2040 GHG emissions compared to the existing condition (Table 3.1-2), together with the ongoing initiatives and specific project components intended to achieve GHG reductions described in Section 3.1 of the Final EIR/EA, would support statewide efforts to reduce GHG emissions. In particular, the “CEQA Conclusion” discussion in Section 3.1 addresses the project’s consistency with State regulations that set GHG reduction targets of 1990 levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

Table 4.1-1 of the EIR/EA has been revised to document all scoping comments received for the project. The information in the scoping comment referenced in this comment was similar to other comments previously summarized in Table 4.1-1.

The comment suggests that managed lanes will discourage SOVs from shifting to other travel modes such as carpooling or transit. The project proposes to set the occupancy of the express lane to HOV 3+, which would allow toll-free use of the lane for HOV 3+ carpools and buses. HOVs with 2 occupants could use the lanes by paying a partial toll, and SOVs would be allowed to use the express lane for a toll as long as the express lane is operating at 45 mph or better per Federal standards. This allows the lane to operate at its optimum capacity and maximize person throughput on the freeway. If the lane becomes full, SOVs can be restricted from using the lane by going to an "HOV ONLY" mode, to ensure reliable travel times for carpools and buses. Reliable travel times for HOVs and buses are considered incentives for SOVs to shift to carpooling and/or bus use.

As noted in Section 1.3.2.3, while carpooling and buses help to increase the number of people per vehicle on the freeway, the express lane technology is also needed to monitor and manage the use of the lanes to maintain the most efficient flow of traffic with regard to both traffic volume and travel speed. Without the technology to monitor and manage the number of vehicles in the express lanes, all vehicles on US 101 in the project limits would be subject to future delays
that cannot be otherwise controlled. Therefore, the project’s purposes are not in conflict with managed lanes.

21-6

As stated in the response to Comment 21-5, the project would give carpoolers and buses top priority. When the express lanes become congested, the toll price would increase to restrict the number of SOVs in the lane, or the overhead signs would change to read "HOV ONLY". The express lane would prioritize HOVs and buses first. The express lanes would give SOVs the lowest priority. Currently, the project corridor provides no incentive to carpool north of Whipple Avenue as an express or HOV lane does not exist.

The project proposes to allow HOVs with 3 or more occupants to travel in the express lanes free of charge and HOVs with 2 occupants to travel in the lanes by paying a partial toll. This has two benefits. First, this encourages a mode shift from HOVs with fewer occupants to HOVs with more occupants, which increases the person throughput on the freeway. Second, it maximizes the carrying capacity of the freeway during this mode shift. The proposed managed lanes would encourage an increase in HOV 3+ demand and allow HOV 2+ vehicles and SOVs to use express capacity while maintaining reliable travel times in the express lanes.

Several services and programs that are separate from the proposed project currently assist people to carpool including ridesharing tools such as the 511.org "Ridematch" service, casual carpool, and apps such as Scoop and Waze Carpool. More information can be found at https://511.org/carpool-vanpool/carpool/overview. These tools would continue to be available to carpools seeking to increase from 2+ to 3+.

21-7

Managed lanes would provide carpools and buses with travel time reliability and therefore an incentive to rideshare and use transit. Allowing SOVs into the express lane to fill up the unused capacity would optimize the operations of the freeway system and increase person throughput.

Park and ride lots exist along the US 101 corridor at 3rd Avenue and at the State Route 92 interchange, which are located in the Caltrans right-of-way. A description of additional Caltrans efforts to support transit in the project area has been added to Section 3-1 of the Final EIR/EA, under “Caltrans Activities”/”Local Initiatives.”

In addition to Caltrans, MTC has initiated planning work to add carpool and commuter lots within the Bay Area. There are also various tools and programs that assist people in finding or creating carpools. For example, the 511.org "Ridematch" service has been available in the Bay Area for helping find carpool matches. C/CAG, one of the project sponsors, has begun a pilot program in San Mateo County by making available a mobile (smartphone) carpooling app that helps link drivers and riders to encourage carpooling. Other carpooling programs include financial incentives to join or create a carpool as well as various privately created ridesharing applications. Commuters can take advantage of these tools and incentives to increase use of the carpool priority that would be provided by the proposed project's managed lanes.
The current HOV lanes in the Bay Area operate at the peak periods when congestion occurs. As traffic patterns change and congestion varies, the HOV hours may be subject to change. The CHP enforces existing HOV lane use to the extent practicable. Express lanes within the Bay Area fund CHP to specifically enforce the express lanes. It is anticipated that toll revenues from the proposed express lanes would be able to provide some funding for increased CHP enforcement of the lane, as revenues from operation of the lanes would first fund operation and maintenance of the lanes then alternatives to driving.

The proposed express lanes are anticipated to operate between 5:00 AM and 8:00 PM when the project opens, which would cover the peak commute periods. CHP enforcement areas and video detection would be included with the Build Alternative, and the express lane would be managed to operate at 45 mph or greater by increasing the toll amount as the lane nears capacity. In addition, the lanes would operate as "HOV ONLY" at times to restrict SOVs from accessing the express lane to improve operating conditions, as needed.

The comment states that technology is not a purpose, but would be used to meter the number of SOVs and manage traffic as part of the project. With regard to technology as a stated “need” of the project, Section 1.3.2.3 in the EIR/EA provides an explanation of how technology is already currently used on freeways in the form of camera monitoring of traffic congestion, and how express lanes provide additional technology that allows for lane monitoring as well as the ability to charge tolls. While carpool lanes (which are currently in place on US 101 south of Whipple Avenue) help move more people per vehicle, additional technology is needed to monitor as well as help manage the use of selected lanes to maintain the most efficient flow of traffic with regards to both traffic volume and travel speeds. As an example, Caltrans already uses traffic signals throughout the State at some on-ramps (commonly referred to as ramp metering). These ramp metering lights are a form of existing technology that are used and needed to ensure that a regulated flow of traffic enters the freeway at a rate that does not impair or unacceptably slow the traffic that is already on the freeway. Other forms of existing technology used by Caltrans include loop detectors in the pavement and traffic cameras to identify the number and rate of cars using each lane.

With the proposed express lanes, the system operator would utilize management measures, including dynamic toll pricing, to regulate the number of toll-paying SOVs using the express lanes in order to manage performance of the lanes. The purpose statement to “Apply technology and/or design features to help manage traffic” is a brief but still consistent statement with the commenter’s point that the purpose of the technology is to provide a consistent travel time advantage. Providing travel time reliability is also a stated purpose of the project (Section 1.3.1 of the EIR/EA), and is considered consistent with the intent of this comment. Section 1.4 of the EIR/EA includes more information on the proposed technology and design features to help manage traffic.

The comment is correct in that vehicle miles traveled (VMT) would continue to increase annually with or without the project, as shown in Table 3.1-2 in the EIR/EA. Table 3.1-2 shows...
the average daily speeds because this is a required input for calculating the CO₂ emissions associated with the project. Based on average daily speeds, project-related CO₂ emission factors were estimated using interpolation of EMFAC2014 data for the vehicle fleet mix in San Mateo County.

Average peak period speeds are shown in Tables 5-1, 5-2, 5-3, 5-4, 6-1, 6-2, 6-3, and 6-4 of the TOAR and are summarized below. As shown, the project would provide increases in peak period speeds over the No Build Alternative between 0 percent and 38 percent. However, the Build Alternative would experience slower speeds in the 2020 southbound direction AM peak period (by 4 percent), and 2040 southbound direction PM peak period (by 9 percent).

### Average Peak Period Speeds (Summarized from the TOAR)

| Peak Period               | Peak Period Speed | Difference |  |
|---------------------------|-------------------|------------|
|                           | No Build          | Build      | mph | Percentage |
| 2020 AM Peak Northbound   | 29                | 34         | 5   | 16%         |
| 2020 AM Peak Southbound   | 41                | 39         | -2  | -4%         |
| 2020 PM Peak Northbound   | 15                | 21         | 6   | 38%         |
| 2020 PM Peak Southbound   | 29                | 31         | 2   | 6%          |
| 2040 AM Peak Northbound   | 19                | 24         | 5   | 28%         |
| 2040 AM Peak Southbound   | 25                | 25         | 0   | 0%          |
| 2040 PM Peak Northbound   | 15                | 19         | 4   | 28%         |
| 2040 PM Peak Southbound   | 21                | 19         | -2  | -9%         |

The above table shows that the project would generally result in increases in year 2020 peak period speeds over the No Build Alternative by up to 6 mph, with the exception of the AM southbound direction, which slightly declines in speed due to high demand. In the year 2040, speeds would increase from 0 to 5 mph with the exception of the PM southbound direction which would decrease by 2 mph also due to heavy demand. Overall, the project would improve peak period speeds. Emissions decrease with higher speeds, and the peak period improvements (higher mph speeds) would result in lower emissions on the majority of segments and travel directions, with the exceptions noted above. Considering all segments and peak periods, there would be an overall improvement in average peak period speeds, resulting in lower GHG emissions relative to the No Build Alternative. These average improved speeds are also reflected in the travel times, which would improve with the proposed project.

Please see the response to Comment R87-1 for further discussion of average speeds used to calculate GHG emissions.
The analysis for the project in fact does account for the future by projecting conditions for 2040. The travel demand model used for the traffic analysis of this project is the C/CAG-VTA Model, which is the current, approved model that is used on transportation projects in the county. Congestion Management Program Legislation requires that C/CAG, as the congestion management agency for San Mateo County, develop and maintain a countywide travel demand model to project future transportation conditions and is optimized for the counties of Santa Clara and San Mateo. The model accounts for transportation impacts from neighboring counties and regional commute sheds. More detailed information can be found on the C/CAG-VTA Model in the most recently adopted San Mateo County Congestion Management Program, located here: http://ccag.ca.gov/programs/transportation-programs/congestionmanagement/. Also, please see the response to Comment 16-2 regarding the legal requirements set forth by SB 375 for using the travel demand model.

The comment refers to the long-term solutions along the project corridor and suggests that investment should be shifted over to transit modes and “putting a price on road travel.” The project would support the concepts stated in this comment by providing an express lane. The proposed project would allow charging a toll on the use of the proposed managed lane for SOVs while allowing HOV 3+ to drive at no cost. The lane can also be used by buses, providing reduced travel time and encouraging people to use that mode. The project places a priority on use of the lane for carpooling and buses, and only allows single occupant use (with a toll) when there is available space in the lane. The lane would be closed to SOVs when volumes increase (and speeds decrease) below acceptable standards. Even with the proposed project, US 101 would not have the ability to serve all future demand and other modes such as nearby Caltrain will continue to attract and serve riders.

The EIR/EA is a joint document that presents NEPA compliance in Chapter 2 (which includes the "Regulatory Setting" for each section, where applicable), and CEQA compliance in Chapter 3. Caltrans follows a set guideline in a format that incorporates both NEPA and CEQA under the Standard Environmental Reference (SER), a resource to help State and local agency staff plan, prepare, submit, and evaluate environmental documents for transportation projects (more information on the SER can be found at http://www.dot.ca.gov/ser/). The document satisfies the regulatory requirements under both NEPA and CEQA.

As required by CEQA Guidelines Section 15126, the following describes the location in the EIR/EA where each element is located.

(a) Significant Environmental Effects of the Proposed Project. This is described in the EIR/EA in Chapter 2 and summarized with a significance determination in Chapter 3. As noted in the response to Comment 21-2, additional information has been included in the Final EIR/EA Chapter 3 about the basis for the CEQA significance determinations for Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Transportation/Traffic, and Mandatory Findings of Significance.
(b) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented. The proposed project would not result in significant effects which cannot be avoided, per Chapter 3; therefore, this section is not applicable.

(c) Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Project Should it be Implemented. The proposed project would not result in significant irreversible changes, per Chapter 3; therefore, this section is not applicable.

(d) Growth-Inducing Impacts of the Proposed Project. This is described in Section 2.1.4 and summarized in Chapter 3.

(e) The Mitigation Measures Proposed to Minimize Significant Effects. The proposed project would not result in significant impacts to the environment and, therefore, does not include mitigation measures. However, avoidance and minimization measures are described in Chapter 2 and summarized in the Environmental Commitments Record in Appendix E.

(f) Alternatives to the Proposed Project. Alternatives are described in Chapter 1. As noted in the response to Comment 21-2, the Final EIR/EA has been revised to include additional information about the basis for the conclusions in the Alternatives Considered but Eliminated from Further Discussion section, including a new appendix (Appendix H).

The CEQA environment checklist is presented in Chapter 3. According to Appendix G of the CEQA Statute and Guidelines, the environmental checklist form “may be used to meet the requirements for an initial study when the criteria set forth in CEQA Guidelines have been met”. The checklist is not the work product of an initial study, as the comment suggests. The checklist clearly labels the proposed project’s impact to a CEQA resource area as Significant and Unavoidable Impact, Less Than Significant with Mitigation Incorporated, Less Than Significant Impact, or No Impact.

Please see the response to Comment 8-04 which describes CEQA significance in joint CEQA/NEPA documents.

21-13

A HOT lane, such as the proposed managed lane, is first and foremost an HOV lane because it prioritizes HOVs and buses; SOVs are required to pay a toll that is adjusted according to demand, and SOVs may be prohibited from using the lane all together during times of congestion when speeds drop below the required minimum standards.

21-14

Section 15126.2(d) of the CEQA Guidelines states that a growth-inducing impact could occur if a project "could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

In analyzing the Build Alternative, Caltrans found that it would not remove obstacles to development or induce population growth because it would not provide new general purpose lanes on US 101, a new interchange on US 101, or new access to undeveloped land (as noted in Section 2.1.4 of the EIR/EA). Providing managed lanes with occupancy restrictions and tolls would allow for more efficient use of the existing freeway and more reliable travel times for lane users. The Build Alternative would allow some travelers the opportunity to shift to US 101 from
alternative routes such as I-280 and El Camino Real because US 101 would operate at slightly higher speeds. However, the Build Alternative would not influence travel patterns such that it would change access to employment, shopping, or other destinations; make some areas more attractive for development over others; or increase access in a way that would affect the location, rate, type, or amount of growth or land use change. Lastly, the Bay Area’s planned growth has been accounted for in the traffic projections for the proposed project. The travel demand model used for the traffic analysis, the C/CAG-VTA Model, includes Plan Bay Area socio-demographic projections through 2040. The growth projections included in Plan Bay Area would occur with or without the proposed project.

21-15

The Caltrans Local Development - Intergovernmental Review Program Interim Guidance is available at: http://www.dot.ca.gov/hq/tpp/documents/RevisedInterimGuidance11092016.pdf. This guidance is specific to Caltrans’ Local Development-Intergovernmental Review (LD-IGR) program. Through the LD-IGR process, Caltrans advises Lead Agencies on potential impacts and ways to avoid, minimize, and/or mitigate adverse impacts resulting from land use and infrastructure plans. The proposed project is not under the LD-IGR program, since Caltrans is the lead agency under CEQA and NEPA. Therefore, the proposed project did not evaluate consistency with this policy as it is not applicable to the project.

The guidance document states, "the SMP targets are intended to articulate statewide goals, and should not be interpreted or used as specific thresholds in the review of individual development projects". The proposed project is not inconsistent with this guidance or with Caltrans policies. It is also important to note that the US 101 freeway and the project are one element of the region wide transportation system, which includes rail, bus/transit, ferry, carpooling, and bicycle/pedestrian modes and uses. The proposed project is consistent with this policy’s call for improving transit. The proposed project would support transit on US 101 by prioritizing HOVs and transit in the managed lanes.

Please see the response to Comments 6-4 and 16-7 regarding VMT for the proposed project.

21-16

Please see the response to Comment 21-2 for a discussion regarding updates to the CEQA checklist and to Section 3.1 Climate Change. The information under the heading Project-Level Reduction Strategies has also been updated in the Recirculated Partial Draft EIR/EA and in the Final EIR/EA. The project-level reduction strategies were included as part of the proposed project and would not, therefore, reduce emissions below what is presented in Table 3.1-2. The purpose of this section is to describe the measures included in the proposed project that would reduce GHGs to a lower level than what would be expected without these measures.

21-17

Please see the response to Comment 21-2 for a discussion regarding updates to the CEQA checklist and to Section 3.1 Climate Change.

The EIR/EA identifies that the proposed project would move more people within a designated transportation corridor (helps reduce traffic from diverting from the freeway to alternate routes), and GHG emissions would continue to decrease over time. The following compares the increase
in person throughput (the number of people moved) with the proposed Build Alternative compared to the No Build Alternative (as summarized from the TOAR). The higher person throughput with the Build Alternative reflects the additional lane that prioritizes HOVs (adding substantially to the number of persons moved within the corridor), as well as allowing SOVs when capacity is available.

**Total Person Throughput Comparison in 2020 and 2040**

<table>
<thead>
<tr>
<th></th>
<th>No Build Alternative</th>
<th>Build Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2020 AM Peak Period – Northbound</strong></td>
<td>146,261</td>
<td>165,471</td>
</tr>
<tr>
<td><strong>2020 AM Peak Period – Northbound</strong></td>
<td>147,146</td>
<td>159,014</td>
</tr>
<tr>
<td><strong>2020 PM Peak Period – Northbound</strong></td>
<td>143,064</td>
<td>172,182</td>
</tr>
<tr>
<td><strong>2020 PM Peak Period – Southbound</strong></td>
<td>162,509</td>
<td>180,701</td>
</tr>
<tr>
<td><strong>2040 AM Peak Period – Northbound</strong></td>
<td>134,713</td>
<td>154,313</td>
</tr>
<tr>
<td><strong>2040 AM Peak Period – Northbound</strong></td>
<td>133,334</td>
<td>153,244</td>
</tr>
<tr>
<td><strong>2040 PM Peak Period – Northbound</strong></td>
<td>145,715</td>
<td>172,657</td>
</tr>
<tr>
<td><strong>2040 PM Peak Period – Southbound</strong></td>
<td>159,029</td>
<td>164,684</td>
</tr>
</tbody>
</table>

Source: *Traffic Operations Analysis Report (TOAR)* Tables 5-1, 5-2, 5-3, 5-4, 6-1, 6-2, 6-3, 6-4

Table 3.1-2 in the EIR/EA shows a reduction in GHG over time with both the Build and No Build Alternatives for years 2020 and 2040 compared to existing conditions, indicating the substantial influence of reduced per vehicle emissions as California continues to encourage or support low emission fuels and vehicles. Overall, Section 3.1 found that there would be a reduction in GHG emissions for Opening Year 2020 compared to Existing Year (as shown in Table 3.1-2), and the project would align with policies to keep the State on a trajectory for progress toward the 2030 emission reduction target (set by SB 32).

The project would not affect the State’s consideration of climate change in planning and investment decisions and in the Five-Year Infrastructure Plan, establishment of a technical advisory group, or continuation of the State’s climate change research program. Therefore, the project would not affect the State’s ability to achieve the provisions of EO B-30-15, and would not conflict with EO B-30-15/SB 32.

Therefore, the proposed project was found to have a less than significant impact on greenhouse gas emissions.

21-18

The comment is referring to language in Section 3.1, Climate Change, specifically under “CEQA Conclusion” of the Draft EIR/EA which presents the results of the greenhouse gas and climate change evaluation. Please see the response to Comment 21-2 for a discussion regarding updates to the CEQA checklist and to Section 3.1 Climate Change.
Chapter 3 and Section 3.1 conclude that the proposed project would have a less than significant impact on GHGs.

21-19

The comment questions the analysis of lifecycle emissions of materials involved in constructing the proposed project. The construction emissions were calculated using the Sacramento Air Quality Management District Road Construction Emissions Model. This is a standard model that has been used by Caltrans for many linear transportation projects. It estimates a project's emissions in pounds per day (and tons) by project phase, as well as the estimated tons of emissions over the entire construction period. Emissions for both vehicle exhaust and fugitive dust using estimates of maximum area of land disturbed daily are calculated for the construction of the project.

In addition, AB 262, the Buy Clean California Act was passed in 2017 that requires the Department of General Services (DGS) to establish maximum global warming potentials (GWP) for categories of construction materials by July 1, 2019. Contracts awarded after July 1, 2019 will require that contracts specify facility-specific GWPs and the successful bidder submit an environmental product declaration that specific materials do not exceed the DGS GWP for that material. The GWP list is not yet available and contract requirements are not yet in place. This project would have to comply with all requirements that are applicable at the time the project goes to bid.

21-20

According to the CEQA Guidelines (14 CCR 15126.6), factors that may be used to eliminate alternatives (including Alternatives 2 and 3) from detailed consideration in an EIR include failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts. The reasons for elimination of the alternatives described in EIR/EA Section 1.4.6 are fully disclosed.

The comment states that the description that HOV lanes limit the ability to apply traffic demand management measures in the future is incorrect. But while HOV lanes may regulate the number of SOVs to zero, as suggested in the comment, HOV lanes do not have the ability to adequately manage the HOV traffic demand once the lane has reached its capacity, other than to raise the occupancy requirement. As described in Section 1.4.6.2, the traffic model results for the alternative that proposed adding an HOV 2+ lane (Alternative 2), showed that multiple segments would have HOV demands in excess of the upper limit for operational efficiency, and would therefore not meet the Federal requirement for a minimum average speed of 45 mph or above in the HOV lane. This presents the need to raise the occupancy requirements for HOVs. Section 4.1 of the TOAR describes that the HOV 3+ demand volumes would allow an HOV 3+ lane to operate below capacity when limited to only HOVs. The proposed express lane would raise the occupancy to HOV 3+ and allow SOVs to use the lane if there is sufficient extra capacity. This would adequately manage the lane to increase person throughput and provide a more reliable travel time for carpools and buses.

21-21

The comment states that the EIR/EA should have considered a pricing alternative that would impose tolls on all lanes of US 101. The toll highways that exist in southern California were built
as toll facilities in order to pay for their construction. To date, no existing highway in California has been converted to a tolled facility, and doing so would require State and federal legislative action that is beyond the scope of this project.

Although a toll road alternative could satisfy some of the purposes of the project, it would not "achieve a significant reduction in congestion without any environmental impacts" as the comment suggests. Imposing tolls on all lanes of US 101 would likely shift traffic to other local freeways and roads, increasing VMT due to longer diversion routes. The shift of traffic is expected to expose additional populations to environmental impacts including higher emissions, higher GHGs, and higher noise levels. A toll highway alternative would not provide incentives for HOV 3+ and transit users over SOVs. Moreover, a toll highway alternative would not be consistent with Plan Bay Area 2040, the San Mateo Countywide Transportation Plan 2040, or the SMCTA’s Strategic Plan 2014-2019, which call for HOV/express lanes on US 101 through the project area. For these reasons, a toll highway alternative would not meet the project’s purpose and need and would, on balance, have greater environmental effects than the proposed project.

21-22

The comment suggests considering a design that like the Build Alternative would add a lane to the freeway by converting auxiliary lanes (in the northern portion of the project). Unlike the Build Alternative that would maintain four general purpose lanes and provide one express lane, the suggested configuration would result in three general purpose lanes and two HOV lanes north of Whipple Avenue. Each HOV lane would be accessible to vehicles with two or more occupants.

In the southern portion of the project area, sufficient width is not available to add a lane without substantial impacts to frontage roads including East Bayshore Road, West Bayshore Road, Pierce Road, Van Buren Road, and Rolison Road. Therefore, providing two HOV lanes would require conversion of an existing general purpose lane into an HOV lane south of Whipple Avenue, resulting in two general purpose lanes and two HOV lanes in each direction (between Whipple Avenue and Matadero Creek). Each HOV lane would be accessible to vehicles with two or more occupants. This lane configuration would provide the suggested two HOV lanes, while avoiding widening of the freeway south of Whipple Avenue.

The comment provides a conceptual description of an alternative configuration, with the intent that it would offer increased carpooling incentives compared to the Build Alternative, especially if associated with an outreach campaign to promote carpooling. No substantive data in support of the alternative or claims to its benefit were provided in the comment, but in response a two HOV lane option was reviewed and considered as described below.

HOV Lanes

As described in Table 3-5 of the TOAR, two HOV 2+ lanes already exists in the southern portion of the US 101 corridor (between SR 85 and Embarcadero Road) and it is currently underutilized. The highest existing HOV volumes within the traffic study area (which is larger than the proposed project area) would be in the vicinity of Rengstorff Avenue, predicted at 2,328 vehicles in the northbound AM peak hour, and 2,188 vehicles in the southbound PM peak hour. Two HOV lanes would provide a maximum capacity of 1,650 vehicles per hour per lane, or 3,300
vehicles per hour, which is greater than the peak hour demand for the corridor, and the two existing HOV lanes are below their maximum capacity. Assessment of the suggested configuration demonstrates that in 2020, the two HOV 2+ lanes would have volumes (unconstrained) in the vicinity of Rengstorff Avenue (south of the proposed project area) of 3,038 vehicles in the northbound AM peak hour, and 2,919 in the southbound PM peak hour. The highest forecasted HOV volumes in 2020 within the project limits with the two HOV 2+ lanes would be between San Antonio Road and the Oregon/Embarcadero interchanges, at 2,992 vehicles per hour in the northbound AM peak hour and 2,638 in the southbound PM peak hour. These forecast volumes would be below the 3,300 vehicles per hour capacity noted above. In 2020, the commenter’s proposed configuration would therefore add HOV lane capacity, and allow HOVs to travel the corridor at higher speeds compared to the general purpose lanes, as the comment suggests.

By 2040, as volumes on US 101 increase, the two HOV 2+ lanes would be at capacity, offering no further incentive for SOVs to shift to HOVs. In 2040, volumes (unconstrained) in the vicinity of Rengstorff Avenue (south of the proposed project area) would be 4,022 vehicles in the northbound AM peak hour and 3,603 vehicles in the southbound PM peak hour. The highest HOV volumes within the project limits would again occur between San Antonio Road and the Oregon/Embarcadero Expressway and are forecast to be 4,000 vehicles per hour in the northbound PM peak hour, and 3,505 in the southbound AM peak hour. These volumes would exceed the 3,300 vehicle per hour capacity for the two HOV lanes. Thus, even in the absence of a public campaign to promote HOVs, the HOV lanes would be fully utilized by HOV 2+ vehicles by 2040. HOV demand is predicted to exceed capacity during the peak hours which would result in delay and a potential loss of incentive to use the HOV lanes.

**General Purpose Lanes**

As noted previously, to allow for two HOV lanes, one of the existing general purpose lanes must be converted to an HOV lane south of Whipple Avenue. This would result in changing the existing three general purpose lanes in each direction to two in each direction between Whipple Avenue and Matadero Creek as there is insufficient clearance to widen the freeway without affecting frontage roads. This would force vehicles using the existing three general purpose lanes in the northbound direction to merge to two lanes before reaching the Oregon Expressway/Embarcadero Road interchange. In the southbound direction, vehicles would have to merge from three general purpose lanes to two general purpose lanes at approximately Whipple Avenue. Because US 101 has very high traffic demand during peak periods, these merge locations would create bottlenecks with backups or queuing extending well beyond the merge (or bottleneck) location, resulting in substantial degradation to freeway operations with respect to traffic delays and backups. The general purpose lane reductions necessary for the suggested configuration would result in new bottlenecks forming at the following locations:

- In the northbound direction between the Embarcadero Road/Oregon Expressway off- and on-ramps, the general purpose lane reduction would cause a backup by 2020 extending south more than 6 miles long in the AM peak period and 10 miles long in the PM peak period. By 2040 the AM peak queue at this location would extend 9 miles long. A second major bottleneck would develop between the Marsh Road on-ramp and the Woodside Road off-ramp. The queue from this bottleneck would extend to the Embarcadero Road interchange and connect with the first bottleneck. This would effectively result in congested conditions
on northbound US 101 in the general purpose lanes during the peak periods that begins at approximately the San Tomas Expressway in the City of Santa Clara and extends to Woodside Road interchange in Redwood City (a distance of over 15 miles).

- In the southbound direction between the Woodside Road off- and on-ramps, the general purpose lanes would also merge from three to two, resulting in a bottleneck. This lane reduction would form a queue that by 2020 would extend north more than 10 miles long in the AM peak period and 13 miles long in the PM peak period. By 2040 this queue would increase up to 16 miles long in the AM peak period. A second major bottleneck would develop between the University Avenue on-ramp and the Embarcadero Road/Oregon Expressway off-ramp. The queue from this bottleneck would extend to the Woodside Road interchange and connect with the first bottleneck. Overall, the resulting southbound congested conditions would extend in the general purpose lanes from the Embarcadero Road/Oregon Expressway all the way north to South San Francisco.

These new bottlenecks and backups would increase travel times and delays for vehicles on US 101 and cause traffic to divert to parallel routes such as El Camino Real, I-280, and local streets. The congestion within the freeway would also increase backups on ramps that would affect local streets.

With the general purpose lane reductions described above, the backups would result in overall decreased operating conditions within the corridor compared to the No Build Alternative. Travel time delays (in terms of vehicle hours of delay [VHD]) would be 5.9 percent higher in 2020 and 0.6 percent higher in 2040 than the No Build Alternative. Average travel speeds on US 101 within the project corridor would decline by 1.3 percent in 2020 and 0.3 percent in 2040 compared to the No Build Alternative. VMT would increase because drivers would divert to alternative routes to avoid freeway congestion; total VMT would also increase by 0.8 percent in 2020 and 2040 compared to the No Build Alternative. Increased delays and travel times as well as reduced speeds and traffic diverting from US 101 to use longer parallel routes would result in an adverse impact to operating conditions.

The physical constraints of reducing the number of general purpose lanes to create two HOV lane as proposed would cause severe delays and congestion in the general purpose lanes which could also impact HOVs trying to move into and out of the HOV lanes. This suggested configuration was examined and although it would provide additional HOV capacity, the necessary general purpose lane conversion would create traffic backups ranging from 6 to 13 miles long in 2020, and 7 to 16 miles long in 2040. This impact would substantially degrade traffic conditions throughout much of the project area.

By contrast, the Build Alternative’s mechanisms to use price as a means of managing the lanes and increasing the number of occupants in each HOV provides reduced congestion in the general purpose lanes and improved reliable travel time to HOVs. For example, the Build Alternative would decrease average vehicle hours traveled (VHT) by 2,700 hours when compared with the No Build Alternative. By contrast, the suggested two HOV lane configuration would increase average VHT by approximately 9,800 hours compared to the No Build Alternative. The suggested configuration would not meet the purpose and need of the proposed project because it would increase overall congestion in the corridor as demonstrated by the increase in overall delay, the formation of new bottlenecks, and extensive traffic queuing that would substantially degrade traffic flow in the general purpose lanes.
The Governor's Office of Planning and Research (OPR) identified VMT per capita, VMT per employee, and net VMT as new metrics for transportation analysis and in November, 2017 released a CEQA Guidelines update package. It is anticipated that regulatory language changes to CEQA will be adopted in 2018 by the Natural Resources Agency and that statewide implementation will occur on January 1, 2020. Therefore, Caltrans is still transitioning to new assessment guidelines, as the implementation of this policy has yet to go into effect.

Though the implementation of SB 743 is not yet required, VMT was evaluated throughout the EIR/EA. Please see Tables 2.2.6-4, 2.2.8-1, 2.2.8-2, and 3.2-2, where VMT associated with the project is disclosed.

Please see the response to Comment 21-18 for a discussion regarding CEQA significance.

The comment suggests that Caltrans does not apply the same criteria for assessing VMT and GHG impacts for the proposed project as it does in internal guidance for assessing other projects. Please see the response to Comment 21-15 regarding Caltrans review of land use and infrastructure plans through the LD-IGR process.

The EIR/EA addressed the project's potential VMT impacts in Sections 2.2.6.3 (mobile source air toxics), 2.2.8.3 (energy), and 3.1 (project analysis of GHG emissions). As noted in the response to Comment 21-16, EIR/EA Section 3.1 (under “Greenhouse Gas Reduction Strategies”) describes a number of ongoing initiatives as well as specific project components intended to achieve GHG reductions.

The EIR/EA describes existing travel mode shares for San Mateo and Santa Clara Counties in Section 1.3.2.2. The existing facility, as a freeway corridor, cannot accommodate bicycling and walking modes other than on the pedestrian and bicycle facilities outside of the project corridor described in Section 2.1.8.2. Therefore, mode share comparisons are limited to SOVs and HOVs. Please refer to Section 2.1.8.3 under "2020 SOV/HOV Comparisons" and "2040 SOV/HOV Comparisons."

Table 3.1-1 shows the difference in daily hours of how long it would take to travel the project corridor with and without the project. The traffic forecast data shown in Table 3.1-1 summarizes the reduction in vehicle travel delay and shows an overall decrease in daily hours of travel associated with the project when compared to the No Build Alternative.

Information about existing and forecasted increases in future travel time as well as the effect of the proposed project on travel time are detailed in Sections 1.3.2.1 (at the end of the "Bottlenecks" section), 1.3.2.3, 2.1.8, and Appendix D (which provides detailed data that is summarized in Section 2.1.8).

The comment questions the slowing down of travel associated with the proposed project. It is important to note that the project corridor may experience delays in the general purpose lanes under the Build Alternative at select times in select directions and select segments, and that the entire project corridor would not experience overall delays and degradation.
travel savings and delays associated with the Build Alternative are described in Section 2.1.8.3 by study year, peak period, and travel direction. Additional information has also been added to Chapter 3 under “Transportation/Traffic”.

The comment suggests that this information is inconsistent with the average daily speeds in Table 3.1-2. Please refer to the response for Comment 21-10, which discusses the reasoning for the use of average daily speeds in Table 3.1-2 for the CO₂ emissions analysis; the response to Comment 21-10 also discusses the average peak period speeds from the TOAR. The summary table included in the response to Comment 21-10 shows the increases and decreases in speed associated with the peak periods, and is consistent with Section 2.1.8.3.

21-26

The proposed project is one of many planned and future projects that would improve transportation in the Bay Area. For the project corridor, several alternatives were initially considered but were ultimately eliminated because they would not meet the project’s purpose and need. Please refer to Section 1.4.6 for an explanation of the various alternatives that were considered but ultimately eliminated from discussion.

The proposed project stands as one component of a much larger overall approach to the proposed solutions for the Bay Area’s transportation system, described in Plan Bay Area 2040, the regional transportation plan/sustainable communities strategy. The Build Alternative on its own would not be able to improve all traffic issues faced in the region, but would meet the purpose and need stated in Section 1.3.

21-27

Previous comments regarding the Draft EIR/EA’s compliance with CEQA are addressed in the responses above. No additional response is required as the comment does not raise any additional environmental issues or questions about the adequacy of the Draft EIR/EA.
I.4 Comments from Individuals

Comment Letter 22: Larry Abrams

22-1

From: Larry Abrams
To: 504 101 DEIR EA Comments@DOT
Subject: Comment on 101 Express Lanes Minimum Numbers Per Car
Date: Monday, December 04, 2017 1:30:24 PM

Hi,

I recommend that the Express Lane minimum be 4 people to encourage carpool vans. Limiting to just 2 will not alleviate traffic.


Larry Abrams
labrams9@gmail.com
831-254-7325

Response to Comment Letter 22: Larry Abrams

22-1

The project proposes that HOV 3+ vehicles pay no toll, HOV 2 vehicles pay a partial toll, and SOVs pay a full toll to use the express lanes. Although it is not planned or anticipated, an HOV 4+ option is not precluded by any design feature of the project. The operator of the managed lanes would have the option to increase occupancy requirements if the managed lanes do not maintain federally required minimum speeds.

The proposed express lane would prioritize buses and HOVs. Various toll pricing and lane restrictions would be used to keep the express lane operating at efficient conditions. As noted in Section 1.4.1.2, the express lanes, as proposed, would be managed to operate at a minimum speed of 45 mph for HOVs through toll increases for SOVs. If the express lanes reach capacity, the messaging signs would change to read "HOV ONLY" at which point only HOVs would be allowed into the lanes. This would allow the express lanes to maintain an increased speed compared to the general purpose lanes.
Comment Letter 23: Ken Abreu

A separate study is being conducted by the San Mateo County Transit District (SamTrans), called the SamTrans US 101 Express Bus Feasibility Study. The express bus would benefit from the proposed project. As stated in the factsheet for the Feasibility Study, new express bus services along US 101 might be one of several transportation options that helps maximize the benefit of managed lanes on US 101. For more information on the SamTrans feasibility study, please visit the following link: http://www.samtrans.com/Planning/Planning_and_Research/US-101_Express_Bus_Feasibility_Study.html.

Response to Comment Letter 23: Ken Abreu

23-1

A separate study is being conducted by the San Mateo County Transit District (SamTrans), called the SamTrans US 101 Express Bus Feasibility Study. The express bus would benefit from the proposed project. As stated in the factsheet for the Feasibility Study, new express bus services along US 101 might be one of several transportation options that helps maximize the benefit of managed lanes on US 101. For more information on the SamTrans feasibility study, please visit the following link: http://www.samtrans.com/Planning/Planning_and_Research/US-101_Express_Bus_Feasibility_Study.html.
AppI. Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 24: Kevin Burke (1 of 2)

From: Kevin Burke <kev@inburke.com>
Sent: Tuesday, November 21, 2017 10:31 AM
To: SM 101 DEIR EA Comments@DOT
Subject: Freeway widening proposal

24-1
I'm a resident in Belmont. I don't think it's a good idea to widen the freeway. A lot of evidence suggests that widening freeways does not alleviate congestion, it just increases the amount of car traffic.

24-2
We should be aiming for *less* car traffic, not more. Cars are a leading driver of pollution. I would prefer if we invested more heavily in public transportation, like SamTrans. In particular it would be good to raise the frequency of buses on ECR and add more frequent express buses from Belmont to Millbrae BART and the airport.

24-3
I support HOV lanes because they raise revenue for the state, and charge people for behavior that hurts the planet. Ideally the entire freeway would be a toll road with discounts for higher occupancy vehicles.

Thanks,
Kevin

---

Kevin Burke
925.271.7005 | kev.inburke.com

Response to Comment Letter 24: Kevin Burke (1 of 2)

24-1
The commenter's opposition to the project is noted. The proposed project would accommodate more of the planned future demand by converting the existing HOV lane from San Antonio Road to Whipple Avenue to an express lane and creating an additional through lane from Whipple Avenue to north of I-380 to be used as an express lane. It is expected to increase person throughput over the No Build Alternative. The increased VMT associated with a corridor project is expected with the added express lane, as traffic shifts from local roads onto US 101. The Build Alternative would provide a 23 percent reduction in vehicle hour delay compared to the No Build Alternative in 2020 and 16 percent in 2040.

24-2
As stated in the EIR/EA, the proposed project would prioritize HOVs and buses over SOVs. The proposed project would increase person throughput and would provide incentives for transit through travel time reliability.

24-3
The suggestion is noted. Though the implementation of additional bus service and express buses is not included in the scope of this project, one of the main purposes of the project is to encourage transit use. Please see the response to Comment 23-1 for more information about the SamTrans US 101 Express Bus Feasibility Study.
The comment is noted. The proposed project would implement an express lane along the US 101 corridor in San Mateo county, which would serve HOVs and buses as a priority. When there is available capacity in the express lane, SOVs may use the express lane by paying a toll. Revenues collected would be used to fund operations and maintenance then alternatives to driving.
Comment Letter 25: Kevin Burke (2 of 2)

From: Kevin Burke <kev@inburke.com>  
Sent: Wednesday, January 10, 2018 12:03 PM  
To: SM 101 DEIR EA Comments@DOT  
Subject: can we try better bus service?

The commenter's suggestions for shorter headways for the El Camino Real bus route, all-door boarding, and more frequent buses and bus transfers at the Millbrae BART/Caltrain station are noted. While the proposed project does not include changes to the ECR SamTrans bus, it would complement these suggestions by providing express buses a more reliable travel time in the express lane. Caltrans is responsible for the highway system and therefore does not have the authority to implement bus service suggestions, but the proposed lane would serve local, regional, and private bus service which would encourage transit use. Please see the response to Comment 23-1 for more information about the SamTrans US 101 Express Bus Feasibility Study.

Response to Comment Letter 25: Kevin Burke (2 of 2)

25-1

The commenter's suggestions for shorter headways for the El Camino Real bus route, all-door boarding, and more frequent buses and bus transfers at the Millbrae BART/Caltrain station are noted. While the proposed project does not include changes to the ECR SamTrans bus, it would complement these suggestions by providing express buses a more reliable travel time in the express lane. Caltrans is responsible for the highway system and therefore does not have the authority to implement bus service suggestions, but the proposed lane would serve local, regional, and private bus service which would encourage transit use. Please see the response to Comment 23-1 for more information about the SamTrans US 101 Express Bus Feasibility Study.
Comment Letter 26: Michael Chang

I fully support the SM 101 Managed Lanes Project. I think adding express lanes to US 101 as proposed is a great idea, and would not worry that the loss of vines on sound walls in San Mateo will cause opposition to the project. I hope that the...
The commenter’s support for the proposed project has been noted.

The commenter’s concern is noted. It is necessary to reconstruct some segments of the existing sound walls to accommodate the lane additions. Segments of existing sound walls would be removed and replaced closer to the adjacent frontage road with construction of the project. In some locations, the relocated sound walls would eliminate the landscaped area adjacent to the frontage road and as a result, replanting of vines would not be possible. These replacement sound walls are necessary for providing visual screening of the freeway for adjacent residences and businesses as well as a noise barrier. Caltrans will be working with the affected jurisdictions to find an appropriate aesthetic treatment for the replacement sound walls during the final phase of the project. Please see the response to Comment 9-1 for more discussion on aesthetic wall treatments.

The comment suggests an all-electronic toll road in the future, in which all lanes will be charged a toll such as on the 407 Electronic Toll Route (ETR) in Ontario, Canada. In the Bay Area, tolling is authorized on specific bridges and express lanes, but not on general purpose lanes (except at bridges). The 407 ETR is a “pay-per-use” toll road where every vehicle that uses the highway pays a toll. The cost of the toll on this highway depends on the time of day, vehicle class, distance and section traveled, and correct mounting and use of a valid transponder. The
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

407 ETR charges a toll regardless of the number of occupants in a vehicle. One of the purposes of the U.S. Highway 101 Managed Lanes Project is to encourage carpooling and transit use by extending the existing carpool lanes north of Whipple Avenue to I-380, and charging a toll for single occupant use. The additional or extended lane in combination with the ability to manage traffic use of the lane by adjusting the toll for SOVs would improve travel time reliability for HOV/express lane users. Therefore, something similar to an all-electronic toll road such as the 407 ETR would be difficult to implement in a way that only charges some users without requiring everyone on the freeway to participate.

Comment Letter 27: Bradley Cleveland

From: Dinh, Uy@DOT <uy.dinh@dot.ca.gov> on behalf of SM 101 DEIR EA Comments@DOT <sm101deir_ea_comments@dot.ca.gov>
Sent: Wednesday, January 17, 2018 1:16 PM
To: Bradley Cleveland; SM 101 DEIR EA Comments@DOT
Subject: RE: what’s the deadline for public comments?

Hi Bradley,

The deadline for public comments is January 19, 2018.

Thank you.

SM 101.

From: Bradley Cleveland [mailto:bcleveland@gmail.com]
Sent: Friday, January 12, 2018 4:56 PM
To: SM 101 DEIR EA Comments@DOT
Subject: what's the deadline for public comments?

---

Bradley Cleveland
Planning and Land Use Consultant
bdcleveland@gmail.com
510 897 1993

Response to Comment Letter 27: Bradley Cleveland

27-1

The deadline for submitting public comments on the Draft EIR/EA was January 19, 2018. The commenter was responded to by email on March 17, 2018. However, all public comments received have been included here.
Comment Letter 28: Adam Cozzette

From: Adam Cozzette <acozzette@gmail.com>
Sent: Wednesday, January 17, 2018 9:22 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Comments on 101 Managed Lanes Draft EIR
Attachments: DEIRComments.pdf

Hello,

28-1 Please find attached my comments on the draft EIR for the 101 Managed Lanes Project. If you wouldn't mind, could you please reply to confirm when you receive this email?

Thank you.

Sincerely,

Adam Cozzette
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Adam Cozzarella
512 Elm Avenue
San Bruno, CA 94066
acozzette@gmail.com
408-460-4024
January 17, 2018

Here are my comments on the draft environmental impact report for the 101 managed lanes project.

The EIR claims that one purpose of the project is to “encourage carpooling and transit use,” but the language of the document prioritizes drivers over other users. For example, on page 1-5 the authors write “drivers in HOV lanes also experience delays in some segments of US 101.” What about all the other vehicle occupants who are not driving but who experience the same delays? The document should be updated to take all users of the road into account and not just refer to “drivers” alone. Other pages where the word “driver” should be reconsidered are 1-7, 1-8, 1-11, 2-19, 2-20, 2-30, and 2-34.

The EIR claims on page 2-8 that the project is consistent with the Santa Clara County General Plan, but it is not in fact consistent with that plan. Policy C-TR 11 from the General Plan says (emphasis mine): “Santa Clara County shall participate in updating and implementing the Congestion Management Plan, the provisions of which as set forth by law: a. establish priority for air quality goals and objectives and development of alternatives to automobile travel; and b. allow additional road capacity to be created only when all feasible automobile travel demand measures have been implemented.” The plan identifies several feasible measures, such as pricing of employee parking, which have not yet been implemented. Therefore, creating additional road capacity is inconsistent with the plan. Recommendation C-TR(11) also calls for “placement of a greater proportion of roads (and related facilities) cost directly on the users of roads.” Funding a highway widening with a general sales tax increase, as CalTrans plans to do, is inconsistent with this.

Page 2-14 states that the Build Alternative would only increase VMT by about 1.2% over the No Build Alternative. This number sounds implausibly low. If the model predicts that some commuters will start using 101 instead of alternate routes like El Camino and 280, I think we should expect an induced demand effect to fill up the newly available capacity on those alternate routes. Taking that effect into account, I would strongly suspect the true VMT increase would be greater than 1.2%.

Page 2-14 also claims that the project would have no effect on housing growth, but this is hard to believe. If the project even temporarily reduces commute times, that will enable commuters to live further away from the office than would otherwise be practical. I would expect this to result in at least a little bit more housing being built in more suburban areas further from the main employment centers.

My understanding is that the traffic demand model used by the EIR is secret. I believe that invalidates the results because it means they cannot be independently verified by the public. Caltrans should just make the model available so that members of the public can reproduce the results.

Sincerely,
Adam Cozzarella
Response to Comment Letter 28: Adam Cozzette

28-1

The comment was received by Caltrans on January 17, 2018. The commenter was emailed on March 19, 2018 indicating receipt of the comment letter, as requested.

28-2

This change was made throughout the document. 'Drivers' is now only used for single occupant drivers. 'Drivers' was replaced with 'travelers', 'vehicles', or 'users', where applicable.

28-3

The comment refers to a policy of the Santa Clara County General Plan that would allow additional road capacity to be created only when all feasible automobile travel demand measures have been implemented. CEQA requires that an EIR consider whether a proposed project may conflict with a land use plan, policy, or regulation (including but not limited to general plans, specific plans, or zoning ordinances) that was adopted for the purposes of avoiding or mitigating an environmental effect. In Santa Clara County, the proposed project would occur entirely within the State right-of-way. A city or county general plan would not have jurisdiction over the State right-of-way. Nevertheless, consistency with local plans and policies is still evaluated for the purpose of providing information. An inconsistency with regional plans and local general plan policies is not considered a significant impact under CEQA unless it is related to a physical impact on the environment that is significant in its own right.

However, the proposed project is generally consistent with this policy as the Build Alternative would convert the existing HOV lane from San Antonio Road to Whipple Avenue in Santa Clara County to a managed lane. This lane would prioritize HOVs as well as buses. If the lane becomes congested, SOVs would be restricted from using the lane and overhead messaging signs would read "HOV ONLY." Therefore, it would not create additional capacity in the Santa Clara County segment of the corridor.

The project will be funded with federal, State, local, and private funding. The project is fully funded and does not require a general sales tax increase.

With regard to the policy cited, this project would place a greater portion of the cost over time on the users in that it charges a toll for SOVs using the express lanes. Planning and construction would involve an investment of public and private funds, but toll revenues over time would fund operation and maintenance of the project, and potentially other transportation services in the corridor.

28-4

The comment is referring to the traffic forecasted modelling results that predict a 1.2 percent increase in vehicle miles traveled (VMT) for the Build Alternative compared to the No Build Alternative. The forecast model used for the analysis accounted for the regional area, which includes other major roadways and arterials such as I-280 and SR 82 (El Camino Real). With the Build Alternative in place, the model showed an overall increase of 1.2 percent over the regional area and not just the US 101 corridor. This suggests that with improved conditions along US 101, some vehicles may use this corridor as an alternative to the other corridors in the region.
Therefore, the person throughput along US 101 may increase at a higher rate, but the 1.2 percent increase in VMT would span over the regional area. Please see the response to Comment 6-4 for a discussion of project demand.

28-5

As noted in Section 2.1.4.3 of the EIR/EA, the proposed project would encourage travelers to use US 101 instead of longer parallel routes such as I-280 and SR 82 (El Camino Real). The proposed project would not change land use policies or planned development. The comment suggests that travel time savings from the proposed project would encourage commuters to drive longer distances on US 101 and that this would lead to more housing being built in communities outside of San Mateo County. The Travel Demand Memorandum for the proposed project (Appendix A of the TOAR) demonstrated that this would not occur. It states that the US 101 corridor is not expected to attract induced demand from other areas. It is expected to attract demand to US 101 from other parallel facilities. The proposed project would not have an effect on housing growth.

28-6

The traffic demand model used for the analysis of the project is not a secret. The travel demand model used for the traffic analysis of this project is the C/CAG-VTA Model. Please see the response to Comment 21-10 for more information about the model.
Comment Letter 29: David P. Discher

From: David P. Discher <dpd@ixsystems.com>
Sent: Wednesday, November 29, 2017 12:18 PM
To: SM 101 DEIR EA Comments@DOT
Subject: SM 101 - Managed Lanes Project (MLP)
Attachments: signature.asc

City of San Carlos shared this (was living in San Carlos, now Redwood City) ... and I replied on the Facebook post and sharing this with CalTrans. I believe I also have sent comments to speaker pro tem Kevin Mullin.

29-1 I don't like express lanes. These should be HOV/Carpool lanes only.

Also as someone with an electric car, Bay Area FasTrak as not been able to provide and exterior FasTrak Flex toll tag. Even though my plate is registered, and have Clean Air HOV stickers aren't enough. I need a flex tag with a switch, that will always stay in a single setting. I was hoping I could register my tag with FasTrak as an CleanAir HOV car ... but they have been unresponsive.

29-2 The interior tags do not work through my windshield, and have quite enjoyed the success of the front mounted exterior tag.

Making these express lanes will not allow me to use them - unless Bay Area FasTrak can fix the transponders, or do it entirely on license plates (like other states do).

And no, with the Transponder, license plates and HOV stickers - I still got charged using Express Lanes in LA and along I-580 in the bay area.

The next point is cheating. There is A LOT of car pool violators. Massive crack down on cheaters would help. Though the express lanes with the electronic monitoring would likely do so. However, we should do heavier enforcement ...

Start up idea for someone ... drones with Infrared heat cameras. Sort of like stop-light cameras I guess.

Response to Comment Letter 29: David P. Discher

29-1

The commenter’s opposition to the project is noted.

29-2

The commenter is correct that travelers wishing to use the express lanes would need to obtain either a FasTrak® toll tag or FasTrak® Flex toll tag. If the commenter has an applicable clean air decal allowing them to drive in the HOV lane for a partial toll, they should set the FasTrak® Flex toll tag to 2+ to be charged the partial toll. They could still mount the FasTrak® Flex toll tag outside their vehicle.
FasTrak® also offers exterior mounted toll tags. Please contact FasTrak® directly to determine the best way to use express lanes with an exterior mounted toll tag. More information can be found at https://www.bayareafastrak.org/en/howitworks/howToMount.shtml#.

29-3

The suggestions for greater enforcement and technologies are noted. The proposed project would use a combination of monitoring equipment and CHP monitoring for enforcement of the express lanes. Please see Sections 1.4.1.2 and 1.4.1.3 of the EIR/EA for more details.
Comment Letter 30: Rita Fusaro

The comment suggests that Caltrain should lower its fares. Caltrans is unable to control the fares charged on Caltrain services. Please direct your comment to Caltrain by visiting http://www.caltrain.com/about/contact.html.

Response to Comment Letter 30: Rita Fusaro

30-1

The comment suggests that Caltrain should lower its fares. Caltrans is unable to control the fares charged on Caltrain services. Please direct your comment to Caltrain by visiting http://www.caltrain.com/about/contact.html.

30-2

The Build Alternative supports this suggestion as HOV 3+ vehicles and buses would be able to use the express lanes at no charge and HOV 2+ vehicles would be able to use the express lanes for a partial toll. By prioritizing HOVs and buses, traffic flows in the express lanes would be better managed and travel time reliability would improve compared to the No Build Alternative.
Comment Letter 31: Glenn Gilbert

From: Glenn Gilbert <gilbert_g@sbcglobal.net>
Sent: Thursday, January 18, 2018 6:32 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Proposed replacement of the wall along 101 and the impact to housing at 711 S. Bayshore and adjacent properties

To Whom It May Concern,

31-1 As an owner of a condo at 711 S. Bayshore Blvd. in San Mateo, I am concerned about the planned expansion of lanes on 101 that will directly impact the residences in our 30 unit building as well as the 21 adjacent town homes. The plan calls for the tear down and rebuild of the wall separating our buildings from the freeway.

We strongly recommend that the project not be undertaken. In the event that you do decide to move forward, what follows are the concerns that reflect the thinking of the vast majority of owners and tenants of this neighborhood:

31-2 Noise abatement and functional aesthetics. The current 14 foot wall is equipped with a few inch soil line at the base in which very beautiful dense vines have grown to cover the wall. The foliage is most pleasing to the eye and helps to battle the sound of traffic. It also mitigates against the likelihood that graffiti will cover large areas. We already see this occurring on many of the bare walls along the freeway.

Unless a few inches at the base of the new wall is incorporated into the plan it will not be possible to replace the vines.

31-3 Another point is the height of the wall which would be much more functional if the new wall were 16 feet, the same height that we see in many other of the walls along the freeway.

31-4 The road along 711 S. Bayshore Blvd. should be kept as a two way street with parking along the building frontage. There is currently insufficient street parking and making it a one way street would cause a major inconvenience for the building residences as well as disrupting the neighborhood traffic patterns.

31-5 The time it will take to demolish and rebuild the wall is a major concern. Without the wall, the freeway sound is deafening and would be intolerable over a period of even a few months. Property values would also be impacted.

31-6 Lastly, we are concerned about the lighting that will be emitted from the new freeway signs which would be of a concern especially to the occupants of the upper level units.

Thank you for taking these views into consideration as you move forward in your evaluation. Most of those who will be impacted by this project will be taking a very active role in opposing it and, if need be, vigorously making our concerns known and addressed by the key decision makers in control of this project. We are united as residents and will hold our elected officials accountable.

glenn and eleanor gilbert
711 S. Bayshore Blvd. #27
San Mateo, CA 94401
gilbert_g@sbcglobal.net
(415) 927-4759
Response to Comment Letter 31: Glenn Gilbert

31-1

The commenter's opposition to the project is noted.

31-2

The comment is noted. It is necessary to reconstruct some segments of the existing sound walls to accommodate the lane additions. Segments of existing sound walls would be removed and replaced closer to the adjacent frontage road with construction of the project. In some locations, the relocated sound walls would eliminate the landscaped area adjacent to the frontage road and as a result, replanting vines would not possible. These replacement sound walls are necessary for providing visual screening of the freeway for adjacent residences and businesses as well as a noise barrier. Caltrans will work with the affected jurisdictions on aesthetic treatments for the replacement sound walls during the design phase of the project. Please see the response to Comment 9-1 for more discussion on aesthetic wall treatments.

31-3

The comment noted that the replacement sound wall would be more functional if it were 16 feet in height. Because none of the evaluated barriers have an estimated construction cost below the total reasonable monetary allowance, only existing noise barriers are to be replaced. These replacement walls will match the heights of the existing walls, but subject to design standards.

31-4

The comment is noted. The proposed project would require a slight narrowing of the roadway at this location and would not require a reduction in the number of travel lanes or street parking.

31-5

The commenter's concerns are noted. Comments were received from residents requesting a minimum length of time during which the walls are temporarily removed and replaced. Minimizing this time will be a performance objective of the construction contractor, but this time period would also depend on the type and design of the wall, as well as unique circumstances and requirements at each location where the work is performed. As part of Caltrans Value Engineering and Constructability overview, the Caltrans design team will evaluate various stage construction scenarios, and walls will be reconstructed as soon as practicably possible. The determination of the replacement walls would take place during the final design phase of the project. Neighboring residents and businesses will be notified throughout the process of the schedule for demolishing the existing sound walls and constructing the replacement walls. During construction, short-term avoidance and minimization measures will be implemented to reduce the potential noise impacts, as discussed in Section 2.2.7.4 of the EIR/EA.

31-6

The lighted Variable Toll Message Signs (VTMS) were evaluated as part of the Visual Impact Assessment. To the extent feasible, the project development team located these signs away from locations along the Bay and residential areas to avoid visual impacts. Additional roadway lighting would be placed along the median barrier to maintain visibility of the narrow median shoulders. Median lighting will be directed to the roadway and designed to minimize light...
trespass. The replaced sound walls along South Bayshore Boulevard would help to provide a visual screen from the freeway and would minimize impact from the additional lighting and signage to be installed along the freeway median.

The commenter’s particular location is shown as M43 (for noise analysis purposes) on Sheet 38 of Appendix C. As shown in the figure, this residence is located behind a recommended replacement barrier, which would provide a visual screen from the freeway. In addition, the closest VTMS sign would be located on the opposite side of the freeway approximately 350 feet southwest of the residence (shown as a brown circle on Sheet 38 of Appendix C). Therefore, the VTMS sign would not be located in direct line of sight of the commenter’s residence and the commenter would experience some shielding by other structures, including the replacement sound wall. The changes to light affecting the second story at this location are anticipated to be low.
Comment Letter 32: Mark Henderson

209 Santa Clara Way
San Mateo, CA 94403
mhenders42@gmail.com
20 December 2017

Yolanda Rivas, District Branch Chief
California Department of Transportation, District 4
P.O. Box 23660, MS 88
Oakland, CA 94623-0660
sm101DEIR_EA_comments@dot.ca.gov

Re: U.S. Highway 101 Managed Lanes Project Draft Environmental Impact Report

Dear Ms. Rivas,

Thank you for the opportunity to review the Draft Environmental Impact Report for the U.S. Highway 101 Managed Lanes Project in Santa Clara and San Mateo Counties, released in November 2017. As a San Mateo resident, I support this important transportation project. As a parent at North Shoreview Montessori School, a public magnet school in San Mateo, I write to bring to your attention the potential impacts of construction on the school community, and request that the Final Environmental Impact Report include additional measures to reduce these impacts.

According to the DEIR, the project requires the reconstruction of the Monte Diablo Avenue pedestrian/bicycle overcrossing in San Mateo. As the DEIR notes in section 2.1.3.3, that overcrossing provides important community access across U.S. 101. North Shoreview Montessori School is located between 500 and 1000 feet of the Monte Diablo Avenue Overcrossing. When the overcrossing was last demolished and rebuilt in 2008, that process had some negative impacts on the school community. Students and families who usually walked or bicycled to school from the North Central neighborhood via the overcrossing were particularly inconvenienced. Construction noises affected the school day, with pile driving continuing incessantly through the state-mandated STAR testing window in the spring. Compared with the test scores from 2007 and 2009, over 7 percent fewer students at North Shoreview met their grade level standards on the 2008 test, an unusual drop that can likely be attributed at least partially to the construction noise impacts.

The DEIR’s proposed avoidance/minimization measure (TRA-1) specifies that Caltrans will work with the City of San Mateo to develop a plan that minimizes the time the overcrossing will be closed and provides signage. I suggest that Caltrans also consult with the San Mateo-Foster City School District’s Safe Routes to School coordinators and school staff about scheduling the overcrossing closure, notifying affected families, and providing alternative transportation options during the closure. To mitigate the impacts of the closure on school attendance, Caltrans should provide a shuttle service between the North Shoreview and North Central neighborhoods before and after school for the duration of the closure.

The DEIR’s proposed noise control measures (NOI-1 through -10) do not adequately avoid construction noise impacts on the school. These measures should be enhanced to specify that construction will be

US 101 Managed Lanes Project I-136 October 2018
timed to avoid or minimize noise impacts on the school, scheduling work like pile driving outside of
school hours or during school vacations. During construction, Caltrans should monitor noise levels
within the school site itself. (The nearest noise receptors to the school, S35 and L36, appear to sit at
lower elevations than the school, and therefore may not accurately reflect noise conditions affecting
students and teachers.) Caltrans should have a mechanism in place to report to the school and
community if noise levels exceed the standard for Activity Category D (52 decibels, according to Table
2.2.7-1), and to promptly take actions to reduce or reschedule activities causing excess noise.

Thank you for your consideration of these comments. I hope that this project will move forward with
appropriate measures to address these impacts.

Sincerely,

Mark Henderson

CC: Melinda Fore, Principal, North Shoreview Montessori School

Response to Comment Letter 32: Mark Henderson

32-1

The commenter’s support for the project is noted.

32-2

Please see the response to Comment 2-1.

32-3

Please see the response to Comment 2-1.
Comment Letter 33: Laura Hesselgren

From: Laura Hesselgren <laura@deerfieldrealty.net>
Sent: Thursday, November 30, 2017 10:46 AM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 corridor - HOV from 380 to Whipple

So, you want to totally gridlock the 101 corridors? Seriously? An HOV lane? Why don't you try driving this corridor for a month to find out exactly what the problem is with the traffic in this area and I can tell you, it's not due to a lack of an HOV lane. I drive it daily as I need my car for my job. As a commercial property manager, I need to go to properties on a daily basis. My commute, due to the 92 off ramp/on ramp has gone from 20 minutes to 50 minutes for a 10-mile commute and if you add an HOV lane, I might as well not even go to work. Let me tell you my observations:

1. The moron that designed the on ramp off ramp north bound at Hillsdale and 92, had obviously never driven a car before. The distance between Hillsdale off ramp going north and south bound for that matter, on 101 and the on ramp to 92, is so short, cars cannot merge onto and off of 101. This creates a back log all the way to Whipple. Though it is a major problem, the other problem is:

2. That there is no connection between Redwood Shores and Foster City. You would eliminate 30% of the cars if you connected those two cities through other means than 101.

3. NO MASS TRANSIT that actually gets you to a job. I tried to get to my job via a train going southbound and I either had to leave at 6:30am or 9am if I wanted to get off at Atherton station, the closet stop to my office. I then had to find a bus that was going to the east side of 101, near to impossible to find. The 6:30am train and bus, got me to work at 9:05am! That's a fricken 2 1/2 hour commute each way via mass transit! Though now with you thinking of implementing an HOV lane, 2 1/2 hours, may be great compared to what you are going to do to 101!

Seriously, get out of your office and actually drive this area for at least a month and then come back with ideas. Sitting in your ivory tower thinking up ideas that are going to make this area even worse, is disheartening. Try working on a better way to get cars to the 92 off ramp without having to merge into the Hillsdale on ramp! THAT'S YOUR PROBLEM AND NOT A LACK OF AN HOV LANE.

Sorry to be so upset in this email but I've had it with your solutions that just make things worse. Seriously, do you even suggest that these engineers that design or come up with this stuff, drive the area they are designing for? PLEASE, NO HOV LANES AS THIS WILL COMPLETELY AND TOTALLY GRIDLOCK 101.

Laura Hesselgren
416 Bayswater Ave.
Burlingame, CA
Response to Comment Letter 33: Laura Hesselgren

33-1

The commenter's opposition to the project is noted. The project proposes to add an express lane, which allows for HOVs, as well as SOVs that pay a toll. The project would not reduce the number of lanes, and in fact would add a lane in each direction from Whipple Avenue to I-380. The project would provide a new commute option along the entire project route for SOVs willing to pay a toll, as well as providing a new carpool lane between Whipple Avenue and I-380 for HOVs.

33-2

The comment is noted. Changing the distance between the northbound on-ramps and off-ramps at Hillsdale Boulevard and the SR 92 interchange is outside of the scope of the proposed project. Improving the traffic flow and increasing mobility at the US 101/SR 92 Interchange is currently being studied by SMCTA. Please see the response to Comment 9-6 for additional information. The proposed project would not preclude the consideration of any future alternatives for improvements at the Hillsdale Boulevard or SR 92 interchanges.

33-3

The comment is noted. The purposes of the proposed project include reducing congestion, encouraging carpooling and transit, improving travel time reliability, minimizing degradation of the general purpose lanes, increasing person throughput, and applying technology to help manage traffic via an express lane on US 101. Creating a separate connection between Redwood Shores and Foster City would be out of the scope of this project. However, the proposed project would not preclude creating a connection between Redwood Shores and Foster City.

33-4

Caltrans is responsible for the highway system and is not able to control mass transit. However, the proposed express lanes would provide buses with reliable travel times with no toll. It is anticipated that with this project, buses would bypass traffic congestion and reliably get to their destinations, thereby encouraging transit use in the corridor. Please see the response to Comment 23-1 for more information about the US 101 Express Bus Feasibility Study.

33-5

Please see the response to Comment 9-6 for information regarding improvements to the US 101/SR 92 Interchange.

33-6

The commenter's opposition to the project is noted. The HOV lanes that already exist between Santa Clara County and Whipple Avenue would be converted to managed lanes that would allow toll-paying SOVs when space exists. No new HOV lanes would be added within that segment. Between Whipple Avenue and I-380, express lanes (which accommodate HOV use) would be added to the existing freeway. The project would not limit the number of general purpose lanes and would add express lanes.
Comment Letter 34: Laurie Hudelson

From: Laurie Hudelson <lauriehudelson@yahoo.com>
Sent: Friday, January 19, 2018 5:30 PM
To: SM 101 DGIR EA Comments@DOT
Subject: 101 Sound wall: South Bayshore

My name is Laurie Hudelson. I am a resident in the Park Bayshore Development located along South Bayshore Blvd, between Newbridge & Dakota in San Mateo. I live at 831 S Bayshore Blvd. I am concerned with several aspects of the proposed plan to expand 101 in San Mateo:

1. The current wall has vegetation to beautify and reduce noise. Is there a possibility that the replacement project would consider adding vegetation? If not, the wall is ugly and prison-like.

2. During construction when the sound wall is down, the noise, pollutants and debris to my living space and exterior home will increase tremendously. What is being done to minimize the impact of this life changing project for residents along this corridor?

3. The residential road of South Bayshore will be impacted visually by a plain, cinderblock wall. Might the project or design manager please consider putting decorative designs along the residential side of the sound wall?

4. What are the logistical reparations for residents on South Bayshore impacted by this project?

5. What is the notification plan for residents along this corridor? I did not receive any notification of this major project and found out by doing my own research. How will residents be notified going forward?

6. When will construction begin and what will the time frame look like? Will the work be round the clock?

Thank you for responding to my inquiries.

Laurie Hudelson
831 S Bayshore Blvd
San Mateo, CA 94401
(650) 303-9275

Sent from my iPhone

Response to Comment Letter 34: Laurie Hudelson

34-1

Several comments were received regarding sound wall aesthetics, construction timing, and avoidance and minimization measures while the walls are temporarily removed. Where available space exists, aesthetic vine treatments would be replaced. Please see the response to Comment 9-1 for additional details regarding replacement sound wall aesthetics. More information will be provided for affected residents during the design phase of the proposed project. Please see the responses to Comment 31-5 and 53-4 for additional details regarding the timing of constructing replacement walls and measures to be taken during construction.

34-2

The proposed project is not expected to substantially affect residents on South Bayshore. Construction activities would be temporary, and avoidance and minimization measures would be implemented to further reduce the potential for negative impacts to residents. These measures are described in Section 2.2.6.4 and Section 2.2.7.4.
Please see the response to Comment 31-5 for details about public notifications during construction.

Construction is anticipated to take approximately three years, starting in Spring 2019 and ending in early 2022. Construction would not be round-the-clock (lasting 24 hours a day); noise ordinances by jurisdiction would be taken into consideration during construction to avoid disturbing nearby residents, where possible. If, during construction, questions arise regarding the proposed project, please contact a Caltrans Public Information Officer. Contact information can be found at www.dot.ca.gov/d4/paffairs/.
Comment Letter 35: Tom Huening

The commenter's suggestion is noted. Please see the response to Comment 36-1 for a discussion of BART.

Response to Comment Letter 35: Tom Huening

35-1

The commenter's suggestion is noted. Please see the response to Comment 36-1 for a discussion of BART.
Comment Letter 36: Tom Huening

Caltrans 101 Managed Lanes DEIR Comments for the record: by Tom Huening

December 11, 2017 San Mateo City Hall

**LEAVE ROOM FOR BART**

The BART Millbrae station design validated the original and existing plan for BART to extend through San Mateo and Santa Clara Counties and circle San Francisco Bay. The Caltrain ROW originally proposed BART extension alignment encountered objections from Caltrain and cities along the route. I asked the lead BART SFO Extension Engineer if a Bayshore/101 alignment was feasible. BART studied the proposed alignment and in a 1998 Sketch Analysis Study (Attached for the Record) concluded as follows:

A preliminary study of these routes and the environmental and construction problems associated with these routes leads to the conclusion that the U.S. 101 corridor is a superior route for a future San Mateo County (BART) Extension. Although there are several engineering issues which must be addressed when working within the right-of-way of a busy Highway, such a route would cost less and will have fewer environmental impacts than construction adjacent to an operating railroad (Caltrain).

The BART Board has shown little interest in this Peninsula master planned segment, understandably due to a full plate in the East Bay, North and South underway extensions. Connecting the BART missing link between Millbrae and Santa Clara is essential and inevitable. BART in just north San Mateo County already boards twice as many passengers as Caltrain throughout the County. Clearly both systems are needed to handle existing and future demand and to relieve Highway 101 congestion.

No funds are currently available for a Peninsula extension but BART Millbrae and Santa Clara must ultimately be joined to serve Silicon Valley and complete BART around the Bay.

Therefore the Draft/Final EIR for the Highway 101 Managed Lanes Project must include provision and leave room for the BART/101 Extension from Millbrae to Santa Clara.

Attachment: BART Millbrae to Menlo Park Extension
Caltrain Corridor Versus
U.S. Highway 101 Corridor
Sketch Analysis Study (10/98)

**Note:** The comment included the October 1998 *BART Millbrae to Menlo Park Extension, Caltrain Corridor Versus U.S. Highway 101 Corridor, Sketch Analysis Study*. The document does not comment on the Draft EIR/EA and therefore has not been included. However, it is part of the administration record for the proposed project and is available upon request.
An express train in the median would require extensive reconstruction of the freeway, even if only to incorporate an elevated (aerial) system supported on columns in the median.

The most recent study for including rail service along or within the US 101 corridor was completed during the alternatives evaluation for the California High Speed Train alignment from San Francisco to San Jose (California High Speed Rail Authority 2010). The California High Speed Rail Authority determined that this alignment is predominantly constrained by the height of existing bridges that serve local road crossings of US 101, replacement of which would result in high construction costs and constructability issues that rendered this alternative impracticable. In addition, the aerial structures could introduce a new adverse visual and noise element along the US 101 corridor adjacent to or nearby the San Francisco Bay shoreline and residential areas. Design speeds for rail are different than for highways, and may require realignment of the highway, further adding to land use impacts and high costs. An aerial alignment near airports (SFO and San Carlos) would also have to be compatible with flight path clearance requirements. A new rail line would require acquisition of large parcels outside of the existing US 101 right-of-way for new passenger stations, including parking and drop off areas, also adding to land use impacts and costs. All of these design requirements contributed to elimination of a rail option on US 101 as an alternative for the California High Speed Train, and these same constraints would apply for placing BART within the median as it would require similar new stations and alignment changes. This was not considered feasible from a community, environmental, cost, or right-of-way perspective. In addition, existing rail service is already available along the peninsula by Caltrain, which serves most of the same communities that a rail corridor on US 101 would serve.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 37: Jennifer Pearson Hughes

From: a.k.a.strobe@gmail.com on behalf of Jenee H <jenee.hughes@gmail.com>
Sent: Wednesday, December 06, 2017 1:41 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Comments against managed express lanes, but for additional carpool lanes.

Regarding this proposal: [http://www.dot.ca.gov/d4/101managedlanes/]

37-1
Replacing carpool lanes with managed express lanes will drive inequality in Silicon Valley. All this does is shift the traffic burden to lower income folks who can’t afford to pay to go faster. Aren’t we shifting enough burden onto them as it is in Silicon Valley?

37-2
And also, if this goes through, you’ll need three people in the car for the carpool to be free. For two people, the toll will be “reduced”, but there’s no explanation of how they’ll manage to reduce it, or how they’ll be able to tell the difference between a solo driver and a car with two people in it.

37-3
Regardless, it’s replacing existing free carpools with paying solo drivers. This didn’t work to reduce traffic on the 210 in LA, and it won’t help relieve congestion here. It’ll just get more solo drivers on the road.

I’m all for adding lanes, but there are already too many non-carpool vehicles in the carpool lane (the electric vehicle exemptions). We could already easily fill the proposed new lanes just with carpool vehicles.

Sincerely,

Jennifer Pearson Hughes
12 Gertrude Ct,
East Palo Alto, CA

Response to Comment Letter 37: Jennifer Pearson Hughes

37-1

The issue of equity and fairness in charging tolls is one that Caltrans takes very seriously. Section 2.1.6 of the EIR/EA describes equity and evaluates the potential for disproportionate impacts of toll lanes. Data from existing express lanes in California and other parts of the U.S. show that both high- and low-income travelers pay to use the express lanes when needed. Although express lane tolls represent a different economic choice to low-income travelers versus middle- and high-income travelers, the choice does not place a disproportionate burden on low-income travelers because express lane use is voluntary. Express lanes are first and foremost HOV lanes, and therefore give priority to HOVs. Carpools and buses would be able to use the express lanes for free. The proposed project has been designed to maintain the same number of general purpose lanes for those who choose not to use the express lanes.

37-2

Section 1.4.1.2 describes in detail the express lane operations, including how toll violations would be detected. Dynamic pricing would be used for the express lane in order to alter operations to meet the minimum speed requirements. For vehicles with two occupants, the project proposes a partial toll would be charged. This discounted price would be determined depending on operating conditions in the express lane. Tolls would be clearly marked on overhead signs to inform travelers in advance of toll rates for each toll zone and hours of use. Please see the subheading “Violations” under Section 1.4.1.2 for a description of enforcement of the express lane rules.
Please see the response to Comment 21-6 for a discussion of the occupancy requirements in the express lanes. Alternative 2, as described in Section 1.4.6.2, would have added an HOV lane to the freeway instead of a managed lane, as suggested in this comment. The analysis of Alternative 2 confirms that the new lane would fill up with carpool vehicles. With no ability to manage the volume of HOVs in the carpool lane, the lane would become congested and offer no travel time savings or incentive for HOVs. This alternative did not meet the purpose and need of the project.
Comment Letter 38: Rick Hunter

From: Rick Hunter <rick.hunter@comcast.net>
Sent: Sunday, December 10, 2017 7:08 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Highway 101 Managed Lanes Project - Comments on Draft EIR

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the 101 Managed Lanes project.

My main concern about this project is equity. A public highway where the rich can pay to go fast while the rest of us wait in traffic is not fair. The discussion of the environmental consequences of toll lanes in Section 2.1.6.3 is not adequate. The discussion mainly states that both high- and low-income drivers pay to use express lanes during periods of congestion, and that the use of express lanes is voluntary. This is true, of course, but the economic burden is much higher on low-income drivers. This is especially true because low-income drivers have less job flexibility than higher-income employees, and are therefore likely to pay for toll lanes more frequently. Consider the burden if an employee making $15 an hour has to pay $15 extra to get to work on time.

If express lanes are desirable because of their overall congestion benefits, the best mitigation is to make sure the revenues collected are used to provide better transportation options for lower income people. This could include subsidizing Fastrak transponders based on income and increasing the use of express freeway buses.

Sincerely,
Rick Hunter
Redwood City, CA

Response to Comment Letter 38: Rick Hunter

Several comments have been raised regarding the potential for express lanes to offer an unfair advantage to high-income travelers at the expense of lower-income travelers. The issue of equity and fairness in charging tolls is one that Caltrans takes very seriously. As the commenter notes, the choice to use the express lanes is voluntary. Data from existing express lanes in California and other parts of the U.S. show that low-income travelers are using express lanes, appreciate the opportunity to use express lanes when needed, and appear to place particular value on reliable travel times compared with middle-income or high-income travelers who may have more schedule flexibility. Although express lane tolls represent a different economic choice to low-income travelers versus middle- and high-income travelers, the choice does not represent a disproportionate burden because express lane use is voluntary.

Moreover, the express lane would first and foremost be an HOV lane, with priority use for HOVs. HOV 3+ vehicles and buses would be able to use the lane for free. If the lanes become congested, tolls would be increased to deter SOVs from entering the lanes, or the toll signs will be changed to read “HOV ONLY” and only HOVs would be allowed in the lanes. The project would not replace any of the existing toll-free general purpose lanes.

The suggestion is noted. Toll revenues would be used for operating and maintaining the project facility. In addition, these funds may also be available for transit in the corridor, which would improve person throughput.
Subsidizing FasTrak® transponders is a possible option in the future, as this is currently available in Southern California as the Low-Income Assistance Plan. Implementing a similar program in the Bay Area would fall under the jurisdiction of MTC, the agency which operates FasTrak®. Please submit this suggestion directly to MTC at https://mtc.ca.gov/about-mtc/contact-us.
Comment Letter 39: Ethan Jacobs

From: Ethan Jacobs <ethanjacobs42@gmail.com>
Sent: Friday, January 19, 2018 11:28 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Public comment on express lanes

Enforcement for the express lane should be done with cameras and software, such as in the SANDAG-XEROX test a few years ago. Carving out spaces for CHP to park is a bad use of funds. By the time construction finishes, Cameras and software will either be ready to do enforcement without CHP, or nearly ready. Please don't waste money carving out CHP spaces. Invest in cameras and software with humans remotely double checking the software before sending out tickets.

Sincerely,

Ethan Jacobs
Albany, CA

Response to Comment Letter 39: Ethan Jacobs

The proposed project would use a combination of cameras and other monitoring equipment as well as CHP monitoring for enforcement of the express lanes, as described in Sections 1.4.1.2 and 1.4.1.3. As described in Section 1.4.1.2, if payment is required and a valid FasTrak® toll tag or FasTrak® flex toll tag is not detected, an image of the vehicle license plate will be used to send a violation notice to the vehicle’s registered owner through the mail. This would use the technology described in the comment. However, the CHP would have the opportunity to observe traffic from several CHP observation areas in the center median of US 101. Tolling system equipment at each CHP observation area would visually alert the CHP officer to vehicles with FasTrak® Flex toll tags set to more than one person. The CHP officer would then visually confirm whether these vehicles are required to pay a toll. In addition, the CHP officer may exit the observation area to pull a violating vehicle over and issue a citation in excess of $400.
Comment Letter 40: Henry Jason (1 of 3)

Comment card may be placed in the comment box tonight, or mailed or e-mailed no later than January 19, 2018 to:

Department of Transportation, District 4
Attn: Yolanda.rivas@dot.ca.gov
P.O. Box 23660, MS 8B
Oakland, CA 94623-0660
E-mail: sm101DEIR_EA_comments@dot.ca.gov

3 areas of concern: A, B, C

Name: Henry Jason, Jr.
Affiliation: Self, homeowner at Las Casitas de San Mateo Condominiums
Address: 711 S. Bayshore Blvd. #28, San Mateo, CA 94401
E-mail Address: henry@henryjason.org

Comment(s):

I am concerned about the replacement of the sound wall (SW4) along South Bayshore Blvd in San Mateo on 101 North. Twenty years ago, I was heavily involved as president of our Homeowners Association in the development of the current sound wall and vegetation on our street.

I am concerned to learn that with the removal and replacement of this sound wall, there will be no evergreen vines or the replacement wall.

I am concerned that the 300 or so feet of blank wall will become a primary target for graffiti since our two blocks are very isolated with no traffic except that of the residents on the street.

The current wall is completely covered with evergreen "Creeping Fig" vines (Ficus Pogons) which were planted by the city of San Mateo. For more than half the length of the street, there is a 12 inch wide space for the growing vines and irrigation hoses (plus a 5 inch curbstone).

As the city of San Mateo knows, they are constantly picking up debris and trash that people dump on...
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

U.S. Highway 101 Managed Lanes Project
PUBLIC MEETING AND OPEN HOUSE
January 11, 2018

COMMENT CARD

Comment card may be placed in the comment box tonight, or mailed or e-mailed no later than January 19, 2018 to:

Department of Transportation, District 4
Attn: Yolanda.rivas@dot.ca.gov
P.O. Box 23660, MS 88
Oakland, CA 94623-0660
E-mail: sm101DEIR_EA_comments@dot.ca.gov

Name: Henry Jason Jr
Affiliation: self, homeowner at Las Casitas de San Mateo
Address: 711 S. Bayside Blvd. #28, San Mateo, CA 94401
E-mail Address: henry@henryjason.org

Comment(s):

on our sidewalks/street during the night because of its isolation. A long black wall will invite massive graffiti happening at night.

I would like the DOT to allow 12 inches of space for the same evergreen vines on the new sound wall. Since there is no traffic on our street except for residents, I believe most residents here would not object to a narrower street or to a change to a one-way street either for the whole two blocks or for our block (from Dakota Ave. to Norton St.)

B) Since I live in a 3 story, 30 unit condominium complex and the 21 unit Park Bayshore Town Homes next door are also 3 stories high, I would like the DOT to make a "Design Exception" and increase the height of our wall from 14 feet to 16 feet higher or more. The current wall mitigates noise on the second and third floors but a higher wall will increase that mitigation even more.

C) I would like the DOT to look into better designs for their sound walls. Pennsylvania is one state that has much more aesthetically interesting sound wall designs.

Please continue on back if necessary.
Response to Comment Letter 40: Henry Jason (1 of 3)

40-1

The commenter’s concern is noted. The comment is referring to sound wall 14 as shown on sheet 38 in Appendix C of the Draft and Final EIR/EA.

It is necessary to reconstruct some segments of the existing sound walls to accommodate the lane additions. Segments of existing barriers would be removed and replaced closer to the adjacent frontage road with construction of the project. In some locations, the relocated sound walls would eliminate the landscaped area adjacent to the frontage road and as a result, replanting vines would not be possible. These replacement sound walls are necessary for providing visual screening of the freeway for adjacent residences and businesses as well as a noise barrier. Please see the response to Comment 9-1 regarding coordination on aesthetic design of the replacement sound wall. As that response indicates, Caltrans Landscape Architecture will work with the City of San Mateo on the aesthetics of the replacement walls.

The conversion of the existing two-way frontage street to a one-directional street would not be under the Caltrans jurisdiction as this is the right-of-way of the City of San Mateo. Caltrans is working closely with the City of San Mateo to investigate all options at this location.

40-2

The commenter’s request is noted. Because none of the evaluated sound walls have an estimated construction cost below the total reasonable monetary allowance, only existing sound walls are to be replaced. These replacement walls will match the heights of the existing walls, but subject to design standards.

40-3

Caltrans will work with the affected jurisdictions to find an appropriate aesthetic treatment for the replacement walls during the final phase of the project. Please see the response to Comment 9-1 for more information on sound wall aesthetics.
Comment Letter 41: Henry Jason (2 of 3)

From: Henry Jason <henry@henryjason.org>
Sent: Thursday, January 18, 2018 7:40 PM
To: SM.101.DEIR.EA.Comments@DOT
Subject: Comments on U. S. Highway 101 Managed Lanes Project

Below are my comments on the U. S. Highway 101 Managed Lanes Project.
I recently attended two of your public meetings, in San Mateo and Millbrae, on this proposed project.

The following are my three main areas of concern.

1.) I am concerned about the replacement of the sound wall (SW4) along South Bayshore Blvd, a frontage road in San Mateo, next to Highway 101 Northbound. Twenty years ago I was heavily involved as president of our HomeOwners Association, in the development of the current sound wall and evergreen vine coverage here. I am concerned to learn that with the removal and replacement of this current sound wall, there will be no evergreen vines on the replacement wall.

41-1 I am concerned that the 900 or so feet of bare wall will become a primary target for graffiti, since our two blocks are very isolated with no traffic or businesses on them, except that of the residents living here. Just today I noticed new graffiti on the STOP sign at the intersection of South Bayshore Blvd. and Dakota Ave. The current wall is completely covered with evergreen “Creeping Fig” vines (Ficus Repens) which were planted by the city of San Mateo. Currently, for more than half the length of the wall there is a 12 inch wide area of soil for the vines and irrigation hoses (plus a 5 inch wide curbside). This space opens up towards the north. As the city of San Mateo knows, they are constantly picking up debris and large trash that people dump on our sidewalk/street during the night because of our isolation. (They are trying to avoid having to pay to bring it to Recology). A blank wall on our isolated street will be a primary target at night for graffiti artists. I would like the DOT to continue to allow 12 inches of soil for the same evergreen “Creeping Fig” vines on the new sound wall.

41-2 I believe that most residents here would not object to a narrower street, or to a change to becoming a “one-way” street, either for the two whole blocks, or for our one block (from the Dakota Ave. intersection to the Norton St. intersection).

2.) Since I live in a 3 story, 30 unit condominium complex, and the 21 unit Park Bayshore Town Homes next door are also 3 stories high, I would like the DOT to make a “Design Exception”, and increase the height of our sound wall from its current 14 feet to 16 feet, or more. The current wall does mitigate noise for us on the second and third floors, but a higher wall will increase that mitigation even more.

41-4 3.) I would like the DOT to look into better, more pleasing designs for their sound walls. Pennsylvania is one state that has much more esthetically beautiful and interesting sound wall designs.

Henry Jason, Jr.
711 S. Bayshore Blvd. #28
San Mateo, CA 94401
henry@henryjason.org

Response to Comment Letter 41: Henry Jason (2 of 3)

41-1 The commenter’s concern is noted. Please see the response to Comment 40-1.

41-2 The commenter’s concern is noted. Please see the response to Comment 40-1.
41-3
The commenter's request is noted. Please see the response to Comment 40-2.

41-4
The commenter's request is noted. Please see the response to Comment 40-3.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 42: Henry Jason (3 of 3)

From: Henry Jason <henry@henryjason.org>
Sent: Thursday, January 18, 2018 8:54 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Further Comments on U. S. Highway 101 Managed Lanes Project

Below are two further comments on the U.S. Highway 101 Managed Lanes Project.
I recently attended two of your public meetings, in San Mateo and Millbrae, on this proposed project.

42-1
1) I am concerned about the two lanes of traffic on 101 Southbound in San Mateo that lead onto the exit ramp for 92 East. In the evening rush hour it is difficult to cross over them when entering onto 101 Southbound from 4th/3rd Ave. East, to get onto the other lanes going south on 101. With an express lane there, it will be even more congested, leaving only one or two regular lanes heading south.

2) Likewise in the evening rush hour, there is a backup of cars on the auxiliary lane getting onto the 3rd Ave. East exit ramp in order to go east to Foster City or to the San Mateo Bridge. (These motorists are trying to avoid going onto 92 East from 101). The problem is that there are only four ways of getting into Foster City from or over 101 (i.e., Third Ave, the 92 corridor, Hillsdale, or Peninsula). The secondary streets in this area of San Mateo are clogged from this traffic because there are insufficient ways for these people to get to Foster City or the San Mateo Bridge from San Mateo during rush hour. An Express Lane on 101 South in San Mateo may cause more problems here.

Henry Jason, Jr.

711 S. Bayshore Blvd. #28
San Mateo, CA 94401

henry@henryjason.org

Response to Comment Letter 42: Henry Jason (3 of 3)

42-1

With the Build Alternative, the configuration would be similar to the existing configuration with an auxiliary lane, four general purpose lanes, and an express lane in the southbound direction. In 2020, a bottleneck is predicted to form at the 3rd/4th Avenue on-ramp and SR 92/Fashion Island Boulevard off-ramp due to capacity constraints of SR 92 eastbound and various merges until the inclined sections of the San Mateo Bridge east of US 101. This queue would extend to the bottleneck at Grand Avenue by the end of the PM peak period. In 2020, travel times from I-380 to SR 92 would range from a decrease of 9 percent to an increase of 26 percent, or a decrease of 1 minute to an increase of 10 minutes respectively in the general purpose lanes. However, they would decrease by 27 percent to 75 percent in the express lane. Therefore, carpooling, traveling by bus, or paying to use the express lane as an SOV (when space is available) would provide travel time savings through this bottleneck.

42-2

The express lanes would provide a bypass to this congestion for traffic continuing on southbound US 101. SMCTA is undertaking two planning studies to address congestion on SR 92. Please see the response to Comment 9-6 for more information on these studies.
Comment Letter 43: Shawn Kann

From: Shawn Kann <shawnkann2013@gmail.com>
Sent: Sunday, November 26, 2017 5:38 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 Managed Lanes Project

To whom it may concern,

43-1 This is a bad idea. Adding more lanes is not the answer, the construction alone on the freeway will create a mess more than it already is. Please, don't make it worse than it already is. Have some mercy on those of us who commute between peninsula and Santa Clara on 101. Don't consider anymore construction on 101 please.

Shawn Kann

Response to Comment Letter 43: Shawn Kann

43-1

The commenter's opposition to the proposed project is noted. Whenever possible, construction would be completed outside of peak commute times to minimize disruption. Ultimately, the purpose of the proposed project is to improve the US 101 facility by:

- Encouraging carpooling and transit use;
- Improving travel time reliability for HOV/express lane users;
- Increasing person throughput (the number of people moved);
- Applying technology and/or design features to help manage traffic;
- Reducing congestion in the corridor; and
- Minimizing operational degradation of the general purpose lanes.
Comment Letter 44: Jesse D. Kornblum (1 of 2)

8 Jan 2018
167 Nueva Ave
Redwood City CA 94061

CalTrans SM 101 Managed Lanes Project
111 Grand Ave
Oakland CA 94623

To Whom It May Concern:

44-1
Thank you for publishing the Draft Environmental Report for the San Mateo Country 101 Managed Lanes Project. After reading it and considering the options, I must **oppose the Build Alternative.**

44-2
The Managed Lanes project will allow single occupancy drivers to pay their way to a faster commute. This runs counter to our region’s need to get single occupancy drivers into another mode of transportation. Certainly, creating a faster ride for high occupancy vehicles is a noble goal. But I cannot support a plan which allows the rich to opt out of our region’s transportation priorities.

Yours truly,

JESSE D. KORNBLUM

Response to Comment Letter 44: Jesse D. Kornblum (1 of 2)

44-1

The commenter’s opposition to the project is noted.

44-2

The comment is noted. The proposed express lanes would be voluntary; when capacity allows, SOVs would be able to use the lanes by paying a toll. HOV 3+ vehicles and buses would be able to use the lane toll-free. The proposed project would not reduce the number of existing toll-free general purpose lanes along the corridor; the express lane would be added to the existing facility between Whipple Avenue and I-380, and the current HOV lane between San Antonio Road and Whipple Avenue would be converted to an express lane.

Several comments have been raised regarding fairness and equity. Please refer to the response to Comment 38-1 for this discussion.
Comment Letter 45: Jesse D. Kornblum (2 of 2)

Comment card may be placed in the comment box tonight, or mailed or e-mailed no later than January 19, 2018 to:

Department of Transportation, District 4
Attn: Yolanda.rivas@dot.ca.gov
P.O. Box 23660, MS 8B
Oakland, CA 94623-0660
E-mail: sm101DEIR_EA_comments@dot.ca.gov

Name: Jesse Kornblum

Affiliation: 

Address: 167 Nueva Ave, Redwood City CA 94061

E-mail Address: jesse.kornblum@gmail.com

Comment(s):

Revising my earlier written comments:

I support the Build option, but urge you to not allow single-occupancy vehicles to use the express lane. We must discourage SUVs to meet our transportation needs. Money should not let people have a faster commute on a public road.
Response to Comment Letter 45: Jesse D. Kornblum (2 of 2)

45-1

The comment is noted. Please see the response to Comment 44-2.
Comment Letter 46: Scott Lane

From: Scott Lane <idratherbebikin@gmail.com>
Sent: Friday, January 19, 2018 4:50 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Public Comments -- U.S. Highway 101 Managed Lanes Project DEIR

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

Re: U.S. Highway 101 Managed Lanes Project DEIR

Dear Ms. Rivas:

I have seen the letters sent to you regarding the Draft EIR for the US Hwy 101 "Managed Lanes Project" from both the Sierra Club Loma Prieta chapter as well as the TRANSDEF letter.

The name puts the definition of "Managed Lanes" on it's head and is foreshadowing the long list of misrepresentations, gross errors and complete disregard for state laws passed to reduce GHG as well as CEQA.

Both the Sierra Club and TRANSDEF DEIR Letters are "spot on" in their analysis.
I FULLY agree with every single point that has been raised.

46-1

As the administrative agency in charge of CEQA, CalTrans is not adequately addressing:

1) The various Build/No Build Alternatives correctly by removing valid alternative for analysis
2) Complying with various state laws and mandates including AB332, SN743,
3) Not addressing the failures in past Hwy 101 widening
4) Logical errors
5) Misstatement of "facts" as well as grossly incorrect assumptions

It is clear that the CEQA Analysis is deficient and it must be assumed that it has been done this way to make sure to minimize the public knowledge of the deficiencies so the public does not know ALL of the REAL and ACHIEVABLE alternatives. Instead it is designed to ensure that the CalTrans Preferred Alternative is chosen and justified.

This is gross negligence on the part of both CalTrans and all of the related public agencies in San Mateo. It is a significant breach of the public trust with the assumption that there will not be enough people that learn the real truth that will be able to provide enough public pushback as well as to afford the significant expense necessary to launch a CEQA lawsuit against the various agencies that are violating the public trust by producing
Response to Comment Letter 46: Scott Lane

The commenter's opposition to the project is noted. This comment reiterates other comments received and responded to above.

With regard to item 1, please see the response to Comment 6-2.

With regard to item 2, please see the responses to Comments 21-17 and 21-23.

With regard to item 3, the commenter does not specify the failures of past US 101 widening projects; however, a similar concern was addressed in the response to Comment 16-6.

With regard to items 4 and 5, the commenter does not specify the asserted “logical errors,” “misstatement of facts,” or “grossly incorrect assumptions.” The EIR/EA was prepared in accordance with Caltrans Standard Environmental Reference for joint CEQA/NEPA documents.

With regard to the range of alternatives studied, please see the response to Comment 6-2, which describes the Recirculated Partial Draft EIR/EA.
Comment Letter 47: Oliver Liu

From: Songqing Liu <liu_songqing@hotmail.com>
Sent: Friday, January 19, 2018 8:16 PM
To: SM 101 DEIR EA Comments@DOT
Cc: Songqing Liu
Subject: Re: SM 101 - Managed Lane Project Comment

Hello Project Management Team,

47-1

My name is Oliver Liu and I am a home owner at Park Bayshore Townhomes in the South Shoreview neighborhood of San Mateo. I attended last week’s project public meeting in Millbrae. I commend Caltran’s efforts to mitigate the traffic issue on highway 101, though I do believe mass transit would be a more sustainable long term solution than the addition of an express lane which will surely be overburdened very soon by the ever-increasing traffic on highway 101.

Our neighborhood will be seriously impacted by the lane widening project and rebuilding of the sound wall (between Hwy 92 and 3rd Avenue in San Mateo). I have two major concerns regarding the project.

47-2

First, the potential increase in noise level with the replacement sound wall. How do we measure the noise level before and after the project to make sure there is no negative impact? Can we replant the vine, which plays a crucial role in mitigating the high pitch noise? Alternatively, can we increase the height or use specific designs/materials to improve the effectiveness of the replacement sound wall?

47-3

Second, the construction time of the new sound wall. As we know, construction projects tend to be delayed by various factors. Lengthened project time could negatively impact property values. I strongly urge the project management team to set a strict time limit for replacing the sound wall. I would propose that project management put a financial incentive/penalty in place for the scheduled demolition of the existing sound wall and construction of the new sound wall.

Thank you very much for your kind consideration.

Oliver Liu
Park Bayshore Home Owner

Response to Comment Letter 47: Oliver Liu

47-1

As stated in Section 1.3, the purpose of the proposed project is to encourage carpooling and transit use as well as improve travel time reliability for HOV and express lane users. Please see the response to Comment 23-1 regarding potential transit enhancements in the project area.

47-2

Section 2.2.7.3 describes the predicted noise levels under the Build and No Build Alternatives. Table 2.2.7-4 shows noise increases over existing conditions at receptors along the project corridor. In addition, predicted noise levels are also shown with the replacement walls in place in the Noise Abatement Analysis Results table (Table 2.2.7-6 in the EIR/EA). The replacement walls proposed under this project would shield the same receptors as the existing walls that would be removed for construction of the Build Alternative.

The replacement sound wall would be moved to accommodate adding a lane required by the Build Alternative, and the frontage road would be narrowed. Therefore, there would likely not be
sufficient width to allow for replanting of the vines. Please see the response to Comment 9-1 for more discussion on aesthetic wall treatments.

47-3

Please refer to the responses Comments 31-5 and 53-4 regarding the length of time during which sound walls would be temporarily removed and replaced.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 48: Peter Loeb

From: Peter Loeb <peterloeb1@gmail.com>
Sent: Thursday, January 18, 2018 3:54 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Comment on 101 Managed Lanes Project DEIR

DATE: January 18, 2018

TO: Yolanda Rivas, Office of Environmental Analysis, Department of Transportation, District 4

FROM: Peter Loeb, 411 Maitland Road, Pacifica, CA 94044

RE: Comment on 101 Managed Lanes Project DEIR

The proposed project is fundamentally contradictory of itself. The stated purpose is to reduce congestion and encourage carpooling and transit use. The project proposes to accomplish this purpose by adding lanes and creating “managed” toll lanes.

48-1

Adding lanes will not reduce congestion, it will encourage more vehicles on the road and induce greater demand. There is a state mandate to reduce Vehicle Miles Travelled (VMT). The project will increase VMT.

Managed toll lanes encourage drivers to stay in their single-occupant vehicles (SOV) and thereby discourage carpooling and transit use.

48-2

Managed toll lanes are for those who can afford them. Lower income people who cannot afford the toll are therefore forced into the congested other lanes. A project fact sheet acknowledges that “Solo drivers may expect reduced travel times in general purpose lanes.” In other words, managed toll lanes will benefit the more privileged solo drivers and penalize those who are less fortunate.

48-3

The cost of this fundamentally flawed and misguided project is half a billion dollars.

The project cannot achieve its stated purpose. It is an enormous waste of taxpayer money.

Response to Comment Letter 48: Peter Loeb

48-1

The commenter’s opposition to the project is noted.

The Build Alternative would reduce congestion compared to the No Build Alternative. As shown in Section 2.1.8 of the EIR/EA, corridor travel times for the northbound and southbound AM and PM peak periods in 2020 and 2040 would vary based on the time of day and whether the traveler is in the general purpose lanes or in the proposed express lanes. As shown in Appendix D, travelers in the express lanes are predicted to always have faster travel times with the Build Alternative than the No Build Alternative. Travelers in the northbound or southbound general purpose lanes would generally experience travel time savings with the Build Alternative in both 2020 and 2040. The Build Alternative would also result in increased person throughput compared to the No Build Alternative. Please see the response to Comment R81-12 for a discussion of the project’s consistency with EO S-3-05 and AB 32, which established VMT reduction goals.

The proposed project would encourage carpooling and transit use. The project would prioritize HOVs by allowing carpools with 3 or more people as well as buses to use the express lane for free and allowing carpools with 2 people to use the lanes at a reduced toll. When unused capacity
allows, SOVs would be able to use the express lane by paying a toll. However, if the lane becomes congested, the toll would be increased to deter SOVs from entering the lanes, or the toll signs would be changed to read "HOV ONLY" and only HOVs would be allowed in the lanes. Regardless of the level of congestion, HOV 3+ vehicles and buses would always be able to use the express lane with no toll. Please refer to the response to Comment 6-4 for more discussion on project demand.

48-2

The comment is noted. Please see the response to Comment 38-1 regarding the issue of equity and fairness in express lanes.

48-3

The commenter's opposition is noted.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 49: A Concerned San Mateo Resident (1)

From: motoons <motoons@gmail.com>
Sent: Thursday, November 30, 2017 12:59 PM
To: SM 101 DEIR EA Comments@DOT
Subject: SM 101 - Managed Lanes Project (MLP) - Public Comment

Dear CalTrans,

I’m writing to express my concern about the proposed managed lanes along Hwy 101.

The plan does not account for driver behavior, and poor layout of freeway entrance/exit lanes. You’re talking about spending millions of dollars, while none the real issues are addressed.

First, there is the obvious disadvantage to those barely struggling to LIVE in the Bay Area, much less have to pay for the privilege of not spending a 2-4 hours in their cars every day. Setting up a “Pay to play” system is utterly unfair at it’s CORE.

Second, there is driver behavior that should be curbed, otherwise it will only continue with the additional lane.

- Diamond lanes are already abused - We need increased enforcement to deter those seeking to gain the system.
- Adopt and ENFORCE a left lane passing only law. Many states already do, it’s shocking that a leader like California doesn’t have this law established already. Much of the congestion I’ve seen is caused by distracted drivers and those who want to coast at 35-40 mph in the left lane and by drivers weaving lanes to get around them. This is a MAJOR problem. Again, we need to consider “Slow-Poke Laws” with real penalties for drivers.

I hope you will consider these factors into your plan. Currently what you’ve proposed is only a very expensive band-aid.

Regards,
A concerned San Mateo resident
2727 Edison St.
San Mateo, CA 94403

Response to Comment Letter 49: A Concerned San Mateo Resident (1)

49-1

The comment is noted. Please see the response to Comment 38-1 regarding the issue of equity and fairness in express lanes.

49-2

The proposed project would use a combination of monitoring equipment and CHP monitoring areas for enforcement of the express lane. Please see Section 1.4.1.2 and 1.4.1.3 of the environmental document for more details. The CHP enforces the current HOV lane to the extent practicable. It is anticipated that toll revenues from the proposed express lane would be able to provide some funding for increased CHP enforcement as part of funding operations of the lanes.

49-3

The vast majority of states in the U.S. have laws that indicate that slower traffic should keep to the right lanes on multi-lane highways. In California, Vehicle Code Section 21654 states that a vehicle being driven at a speed less than the normal speed of traffic in the same direction that is not traveling in the right-hand lane would be considered in violation.
Comment Letter 50: Terry Nagel

50-1

The commenter's suggestion is noted. The forthcoming San Francisco Freeway Corridor Management Study will explore the feasibility of a carpool or express lane north of I-380 to downtown San Francisco. More information on this study and when it will be released can be found at http://www.sfcta.org/freeways.

50-2

The commenter's suggestion is noted. Caltrans is responsible for the highway system and therefore cannot control the next-bus notification system or other social media for transit. However, there are various technological means, such as ridesharing and carpooling apps as well as www.nextbus.com, which provide real-time transit information to passengers. The proposed project would encourage carpool and transit use as the express lanes would provide travel time reliability.
Comment Letter 51: Zonda Nel (1 of 2)

From: Zon Nel <zon_nel@yahoo.com>
Sent: Friday, January 19, 2018 3:56 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 92 is the bottleneck

Has there been any analysis completed that shows what will happen if too many cars arrive at 92 at a higher rate than usual? The problem is 92 not 101. If you cause traffic to get to 92 quicker, you'll actually make the problem worse because the cars will be backed up trying to cross 92.

Thank you for the consideration
Zonda

Sent via mobile

Response to Comment Letter 51: Zonda Nel (1 of 2)

The traffic operations analysis model takes into account the congestion that spills back onto US 101 from the bottleneck on eastbound SR 92 in the PM peak period. The express lanes would allow carpools and buses on southbound US 101 to bypass this congestion. SMCTA is undertaking two planning studies to address congestion on SR 92. Please see the response to Comment 9-6 for more information.
Comment Letter 52: Zonda Nel (2 of 2)

From: Zon Nel <zon_nel@yahoo.com>
Sent: Friday, January 19, 2018 4:35 PM
To: SM 101 DEIR EA Comments@DOT
Subject: The area between 92 and 3rd ave on 101

Hi

52-1 Was there any consideration taken, to moving the wall 1 foot on the southbound side versus 6 inches on both sides? There are more residence on the northbound side of 101 and it’s more disruptive to move the wall there plus less space on Northbound side. Southbound has more businesses.

Thank you

Sent via mobile

Response to Comment Letter 52: Zonda Nel (2 of 2)

52-1

The comment inquires about relocating the sound wall 1 foot on one side of the US 101 facility rather than 6 inches on both sides. The comment does not provide location information. However, based on similar written comments, it is believed the comment refers to replacement sound wall 14 (as shown in Appendix C sheet 38 of 59). The remainder of the answer addresses moving this sound wall.

The proposed replacement sound wall 14 (along northbound US 101) would be relocated between 3 and 6 feet just south of the US 101/ 3rd/4th Avenue Interchange. The current design is required to shift the centerline of the project corridor to ensure that enough width is provided to accommodate the express lanes in both directions on US 101. This design would minimize impacts to South Bayshore Boulevard in accordance with the requirements and standards set forth by the City of San Mateo regarding standard roadway widths.
Hello,

I'm a homeowner on S. Bayshore Blvd., 94401. I have the following concerns about bringing the 101 sound wall closer to residences on S. Bayshore Blvd. as a part of the Managed Lanes Project:

1. First and foremost, we were not contacted about this project. It took word of mouth to find out. Why didn’t DOT or Caltrans send notices to each residence on the street where the wall is planned to be moved? Notifications and updates should be sent to the residences.

2. Why not move the wall on the NB side of 101, opposite our street, to make room for the new lanes? The other side of 101 has commercial buildings that would be less affected by the environmental and financial impact of a closer wall vs residences on our side.

3. Why aren’t improved sound minimizing materials being used for the new wall? If you’re going to tear down a wall and rebuild it, do it right, don’t build the same wall from 20 years ago. Use the latest sound minimizing materials to combat noise volume and pitch, and build the wall a story higher. Also, think of a creative way to get vine coverage on the new wall. The aesthetics are ruined by not replacing the vines, and it opens the wall up to graffiti.

4. What is the maximum time that the old wall will be down before the new wall is completely up? The noise and exhaust level will not be healthy for our residents. This time needs to be minimized, and high fines imposed for each day the builders go over the deadline.

5. What is the impact that the new toll lane lighting and signage will have on the residences? No one likes bright lights coming into their windows, or their sky littered with billboards.

6. How does this project mitigate traffic on 92? So much of the backup on 101 in San Mateo is from people trying to get onto 92 in the evening. This will make it worse because it would just get everyone to the backup on 92 faster. People will still be taking the side streets in our neighborhoods as alternatives to get to 92.

7. On slide 31, graph 2 of the presentation for the public meetings shows that building these toll lanes significantly INCREASES southbound PM peak travel time from 65 to 120 minutes in the general purpose lanes. This is an engineering fail. How are you addressing this issue?

While I understand that there is an immediate need to relieve the congestion on the highways, $34 million taxpayer dollars by must be spent as wisely as possible. I look forward to your addressing these and other concerns in a prompt and thorough manner.

Sincerely,

Tenea Nelson
Response to Comment Letter 53: Tenea Nelson

53-1

Notification and coordination with the general public and public agencies for the environmental process are described in Chapter 4 of the EIR/EA. The comment period and public meetings on the EIR/EA were noticed through a Notice of Completion filed with the California Governor's Office of Planning and Research State Clearinghouse and posted on the project website; advertisements in the San Francisco Chronicle, Mercury News, and San Mateo Daily Journal on November 28, 2017; subsequent notices were sent out on the Recirculated Partial Draft EIR/EA in July, 2018; email blasts from scoping meeting mailing lists, San Mateo County databases, and the Caltrans project website; four press releases to the media; postings on Facebook and Twitter; and press coverage on KRON, KNTV, Mercury News Gary Richards Road Show, and the San Mateo Daily Journal article and editorial.

Neighboring residents and businesses will be notified throughout the process of the schedule for demolishing the existing sound walls and constructing the replacement walls.

53-2

Please see the response to Comments 3-1 and 52-1 regarding the relocation of the sound walls. The replacement of the sound wall is intended to provide sound minimization to residences and businesses. The wall would be moved slightly closer to residences to accommodate the additional width of US 101, and without the wall, these residences would be subject to experiencing permanent elevated noise levels from the freeway.

53-3

Please see the response to Comment 9-1 regarding aesthetic treatments. The Concrete Masonry Units used for sound walls are designed to absorb sound. Vines used on sound walls are an aesthetic enhancement, and are not intended to attenuate sound but rather improve the appearance. In areas where vines are not possible to be replanted, the walls will incorporate an enhanced visual pattern to improve their appearance. The Caltrans Landscape Architecture Division will utilize the current standards to optimize the aesthetics and materials in the replacement wall design to satisfy noise, graffiti, and vegetation concerns.

53-4

Minimizing the length of time during which walls are temporarily removed and replaced will be a performance objective of the construction contractor, but this time period will depend on the unique circumstances and requirements at each location where the work is performed. Not all barriers would be taken down and reconstructed at the same time. As part of Caltrans Value Engineering and Constructability overview, the Caltrans design team will evaluate various stage construction scenarios, and walls will be reconstructed as soon as practicably possible. Factors such as the type of building materials used and the design of the barriers, including aesthetic treatments will affect construction timing and sequencing of demolition and reconstruction.

The determination of the replacement walls will take place during the final design phase of the project. Neighboring residents and businesses will be notified throughout the process of the schedule for demolishing the existing sound walls and constructing the replacement walls. If
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

more inquiries arise regarding the barriers, please contact the Caltrans Public Information Officer. Contact information can be found at www.dot.ca.gov/d4/paffairs/.

With respect to exhaust levels, the EIR/EA evaluated construction emissions in Section 2.2.6.3 and identified them as below BAAQMD recommended thresholds for determining a significant impact. Pollutant emissions from vehicles using the freeway were also evaluated in this section, and would slightly increase with the proposed project due to the additional lane, but would be less than existing conditions because of overall vehicle emission reductions associated with improved engines and fuels that occur over time with or without the project.

53-5

Please see the response to Comment 31-6 regarding the impact of the new toll lane lighting and signage on highway neighbors on South Bayshore Boulevard.

53-6

The comment raises issues of traffic on SR 92. As the comment notes, the origin of this problem is limited queue capacity on SR 92. The project limits would only span the US 101 mainline and not SR 92. It is important to note that the issue of traffic on SR 92 persists with or without the proposed project. However, some benefit is anticipated as a result of the Build Alternative as some HOVs and SOVs traveling longer distances along the project corridor would be removed from the general purpose lane queueing at SR 92 and would bypass this area through the express lanes.

Because the problem raised in this comment originates on SR 92, the need to address this separately from the U.S. Highway 101 Managed Lanes Project is recognized by the local implementing agencies. SMCTA is undertaking two planning studies to address congestion on SR 92. Please see the response to Comment 9-6 for more information.

53-7

Please see the response to Comment 11-2.
The express lanes access configuration allows for lane changes throughout the corridor. Express lanes projects throughout the Bay Area vary in their access configurations, with some using barriers or striped buffers to limit lane changes. The roadway geometry and availability of space in the project area led to the continuous access design. In addition, the proposed configuration would also be consistent with the current "open access" lane configuration in the southern section of the project corridor (from San Antonio Road to Whipple Avenue), which would convert the existing HOV lane to an express lane, unlike the lane addition in the northern section.
Comment Letter 55: Alan Sarver

From: Alan Sarver <asarver@earthlink.net>
Sent: Friday, December 29, 2017 12:58 PM
To: SM 101 DEIR EA Comments@DOT
Cc: Alan Sarver
Subject: Comments on Draft EIR for 101 Managed Lanes Project

Dear CalTrans representatives and project evaluation personnel,

My fundamental concern with the 101 Managed Lanes Project is that the balance of work and expenditures is tilted strongly in favor of adding lanes to 101, rather than dramatic increase in the ration of people transported per vehicle used. The project will deliver several major results:

- HOV3 toll lane (left)
- Connection of existing auxiliary lanes to ensure no reduction in number of unrestricted lanes available
- Addition of auxiliary lanes as necessary to provide safe and freely flowing access where re-purposed existing auxiliary lanes leave a gap in service

The underlying assumption is that 100% of existing unregulated traffic flow on this corridor must still be supported, and that the Managed Lane is an add-on. The connection of existing auxiliary lanes and the addition of new auxiliary lanes represent more than $400M of the $500M budget for the project, the majority of the construction time in the schedule, and the preponderance of the impact identified in the EIR, including all property acquisition.

We cannot pave our way out of the regional traffic issues. It is essential that ride-sharing and public transit be promoted to dramatically cut the number of vehicles moving people around. Rather than spending 80% of the funding on widening the 101 corridor, I recommend:

- Ensuring that at least the 2 left lanes can be Managed HOV Lanes, perhaps making the furthest left lane be HOV3 and the second lane HOV2.
- If possible, consider making 3 out of 4 lanes be Managed HOV Lanes, with 'unregulated' flow in the right hand lane being the exception, rather than the norm
- Get the Managed Lane(s) into operation more rapidly, by not spending significant time and resources on adding lanes
- Use the 80% savings to continue investing in transit, getting more full buses onto the road, replacing 50 single-occupancy vehicles apiece
- Aggressively support the deployment of a network of electric, autonomous, ride-sharing vehicles, which will dramatically reduce greenhouse gas impacts as well as the number of vehicles in use at any time
- Do EVERYTHING WE CAN via ride-sharing to reduce the number of vehicles in use before we go to the major time, expense, and environmental impact of adding lanes to 101

The Bay Area needs a true revolution in transit, and adding lanes to Highway 101 is a 20th Century approach to 21st Century needs. Ride-sharing, transit, and autonomous vehicles can get people out of single-occupant vehicles. Put our efforts and funds there.

Thank you for your consideration of this input,

Alan Sarver

Response to Comment Letter 55: Alan Sarver

Please see the response to Comment 21-17 for a description of the person throughput served by the proposed project.
The project would add a managed lane between Whipple Avenue and I-380, in the form of an express lane that would allow unrestricted use by 3+ carpools and buses, charge a partial toll to HOV 2+, and charge a toll for SOVs. Four lanes in each direction within this segment (Whipple Avenue to I-380) would remain available to all vehicles, as they are now.

Please see the response to Comment 21-22 for a discussion of implementing two HOV lanes in each direction within the project corridor, including why that proposal is infeasible and would not serve the project purpose and need.

55-2

This recommendation would require conversion of three existing general purpose lanes to managed lanes in order to achieve the suggested three managed lanes within that segment. A scenario of converting just one existing general purpose lane to an express lane (with no new lanes added) was studied ("Alternative 3" described in Section 1.4.6.3) and would result in worse traffic operations than the No Build Alternative, and would not meet the purpose and need of the proposed project. It was therefore eliminated from further consideration. Converting additional general purpose lanes would exacerbate the congested conditions identified for Alternative 3.

55-3

The proposed project has been designed to minimize right-of-way changes, property acquisition, and environmental impacts to the extent feasible while still providing travel time savings and increased person throughput along the project corridor. Construction is expected to start in 2019. For a long highway corridor project, construction may take an extended period of time as construction must account for certain factors to maintain operations of the roadway during construction. In addition, construction is done in phases in order to comply with State and local applicable regulations.

An alternative to create an express lane without adding a lane was studied. As noted in Section 1.4.6.3, this alternative would not meet the purpose and need of the proposed project.

55-4

Though the actual implementation of additional bus service and express buses is not included in the scope of this project, one of the main purposes of the project is to encourage transit use. Please see the response to Comment 23-1 for more information about the SamTrans US 101 Express Bus Feasibility Study. Revenues collected would be used to fund operations and maintenance then alternatives to driving.

55-5

The suggestions are noted. Qualified vehicles, including electric and ride-sharing, would be able to use the corridor with the proposed project in place. The proposed project would provide incentives for HOVs.
Comment Letter 56: Amy Tang

From: Amy Tang <xtang82@gmail.com>
Sent: Wednesday, January 17, 2018 5:13 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Park Bayshore Townhomes San Mateo

Hi there,

First of all, this sounds like a great project!

However, I am very concerned about the consequences of widening the freeway. My house is located next to the existing sound wall that would be removed to accommodate the proposed Express Lanes.

My understanding is that because of the widening of the freeway, the sound wall would be built even closer to my house. This would cause the local roads to be narrower, which in turn causes the loss of street curb parking.

In addition, I am afraid the heavier traffic and close proximity of the sound wall will generate much more noise and air pollution. Both would threaten the safety and health of the residents as well as decrease the value of the surrounding real properties, including my house.

I am really interest to know how the project manager would address and deal with the issue.

Best Regards,

Amy Xiaohua Tang, CPA, MS (TAX), JD

Response to Comment Letter 56: Amy Tang

The commenter’s concerns are noted. The sound wall would be replaced to continue to provide noise attenuation, at the same height as the existing wall. There would be a temporary period of time that the wall is removed to allow preparation and construction of the relocated wall. A priority would be to construct the replacement sound walls as soon as feasible.

The local road in this area is South Bayshore Boulevard, which is expected to remain at its existing width as the wall would move only to the extent of the existing curb that is adjacent to the current wall; that curb/shoulder area would be removed to accommodate the replacement wall.

The project’s only parking impacts would include removing up to approximately 350 feet of on-street parking on North Bayshore Boulevard, at Dore Avenue. This would not impact South Bayshore Boulevard on-street parking.

As shown in Table 2.2.7-6 in the EIR/EA, the replacement sound walls are intended to abate noise under the Build Alternative. The table shows noise levels that would be experienced without the sound wall and the predicted noise levels with the replacement wall. In addition, the Build Alternative would result in minor increases in Mobile Source Air Toxic (MSAT) emissions proportional to increases in vehicle miles traveled (VMT), as described in Section 2.2.6.3. However, Table 2.2.6-4 also shows that emissions would decrease in the design year (2040) when compared to the opening year (2020). The observed decrease in estimated MSAT emissions...
emissions is the result of U.S. EPA standards for vehicle emissions that occurs as older cars are replaced with new lower emission vehicles, including electric vehicles. It should also be noted that the replacement walls would only be moved a few feet with respect to their current location. The location of the walls is not anticipated to have an effect on air pollutant concentrations or dispersion of pollutants, and therefore a minor shift in their location would not affect air quality.

Comment Letter 57: Wanda Tormos

<table>
<thead>
<tr>
<th>From:</th>
<th>wanda Tormos <a href="mailto:fffiramos@gmail.com">fffiramos@gmail.com</a></th>
</tr>
</thead>
<tbody>
<tr>
<td>Sent:</td>
<td>Saturday, January 20, 2018 8:48 AM</td>
</tr>
<tr>
<td>To:</td>
<td>SM 101 DEIR EA Comments@DOT</td>
</tr>
<tr>
<td>Subject:</td>
<td>New soundwall</td>
</tr>
</tbody>
</table>

57-1 We live in 813 So. Bayshore Boulevard. We think the wall looks hideous and do not want the new wall. Thanks, Wanda

Response to Comment Letter 57: Wanda Tormos

57-1

The commenter's opposition to the replacement sound walls is noted. Several comments were received regarding the aesthetic of the replacement sound walls. Please refer to Comment 9-1 regarding aesthetic treatments for the proposed replacement sound walls.
Comment Letter 58: (Unknown last name), Cindy

From: s <cynmc110@aol.com>
Sent: Thursday, November 16, 2017 1:30 AM
To: SM101DEIR_EA_comments@dot.ca.gov.
Subject: Highway 101 Managed Lane Project

Hi,

I’m writing in regarding to the project on 101 between 380 and San Antonio Rd. My concern is regarding the off ramps during the evening commute and how impacted they are and the effect it has on local residents. I live in San Mateo Village neighborhood by 101 and Hillsdale.

Is it possible to separate the off ramp from 101 south to Fashion Island Blvd. so that locals can exit without having to get on the hwy 92 exit? This would at least relieve some of the congestion in the lane that goes onto the 92 east. Locals have pretty much created an exit lane using the shoulder of the road so it would be a good idea to make it an actual lane since the space is already there.

Thank you for your consideration,

Cindy

Response to Comment Letter 58: (Unknown last name), Cindy

The suggestion is noted. While changes to the configuration of the US 101/SR 92 interchange are not part of the proposed project, SMCTA is undertaking two planning studies to address congestion on SR 92. Please see the response to Comment 9-6 for more information.
Comment Letter 59: (Unknown last name), Deanna

From: Deanna <deanna1200@gmail.com>
Sent: Wednesday, January 10, 2018 7:32 AM
To: SM 101 DEIR EA Comments@DOT
Subject: Sound wall

Hello,

I live along Highway 101 in San Mateo and wish to know how the new express lanes will affect the sound walls along the freeway. I really hope there are no plans to remove these. Please advise.

Deanna

Response to Comment Letter 59: (Unknown last name), Deanna

59-1

The comment requests information about the sound walls along the project corridor. Some segments of existing sound walls that border the northbound side of the freeway may be reconstructed to accommodate lane additions. Segments of existing sound walls would be temporarily removed and then replaced as part of project construction. Sound walls requiring relocation in San Mateo include:

- Northbound US 101, adjacent to the Marina Lagoon
- Northbound US 101, south of East 3rd Avenue, adjacent to the South Bayshore Boulevard
- Northbound US 101, north of East 3rd Avenue, adjacent to the South Bayshore Boulevard/North Bayshore Boulevard
- Northbound US 101, south of E. Poplar Avenue, adjacent to North Bayshore Boulevard
Comment Letter 60: (Unknown last name), Drew (1 of 13)

From: A C <mr.drewman@yahoo.com>
Sent: Friday, January 19, 2018 1:22 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP DERE comments AUX stripping fixed

Hello there,

As part of this project, I request that Caltrans ensure the white dashed lines between AUX lanes and mainline lanes be consistent through the project area. Currently, there are some longer stretches between on-ramps and the next exit ramps that are using the short and often white exit dashed lines. The worst place is between Oregon Expressway and San Antonio Rd especially in the southbound direction. A significant number of vehicles entering from Oregon Expressway onto SB 101 immediately move over to the mainline lanes when there is about 1.5 miles left to merge. I believe correctly the stripping this area to the mainline white dashes until closer at the exit then switching to the shorter exit dashes would help. These immediate weaving vehicles cause backups on 101 SB north of this interchange on-ramp even though there is plenty of mainline road capacity to keep the backups from occurring.

80-1

When I compare the AUX striping within the project area, the stretches between the following interchanges utilize the long then short white dashes are the following:
- b/w University Ave and Embarcadero Rd in both directions
- b/w Willow Rd and Marsh Rd in both directions
- b/w Marsh Rd and Woodside Rd in NB direction only*
- b/w Whipple Ave and Holly St in NB direction only*
- b/w Ralston Ave and E Millsdale Ave in SB direction only*
- b/w CA-92 and E 3rd Ave in both directions
- b/w E 3rd Ave and Peninsula Ave in NB direction
- b/w Peninsula/Popular Aves and Broadway in both directions
- b/w Broadway and Willbrae Ave in both directions

* the opposite directions between these interchanges most likely need to be fixed as well.

Some of the distances between interchanges in the above list are shorter than the distance between Oregon Expressway and San Antonio Rd. Thus, I believe these AUX lanes lane stripping should be aligned with the rest of the project area.

I believe this has no negative impacts (e.g., Environmental) that would prevent it from being accomplished and reducing congestion is aligned with the projects goals.

Thank you, Drew

Response to Comment Letter 60: (Unknown last name), Drew (1 of 13)

Caltrans follows established guidance for striping to allow consistency for travelers using the freeways throughout the State. Auxiliary lanes are striped in accordance with the California Manual on Uniform Traffic Control Devices (CA MUTCD). The most recent version (2014 2nd Revision) can be found at
http://www.dot.ca.gov/trafficops/camutcd/docs/2014r2/CAMUTCD2014_rev2.pdf. Section 3B.04 – 06 indicates that a dotted white line shall be used to separate a through lane that continues beyond the interchange, a through lane that becomes and exit only or turn lane, or an auxiliary lane 2 miles in length or less. The southbound auxiliary lane from the Oregon Expressway/Embarcadero Road on-ramp to San Antonio Road off-ramp is a lane that becomes an exit only lane at the off-ramp and it is also less than 2 miles in length. This guidance is based on FHWA’s MUTCD 2009 Edition. CA MUTCD 2012 was the first edition to include this guidance (http://www.dot.ca.gov/trafficops/camutcd/). Any changes in striping would be the subject of final design for the project. Restriping or changes in the striping are not considered an environmental impact or issue, and hence are not addressed in detail in the EIR/EA.

Comment Letter 61: (Unknown last name), Drew (2 of 13)

From: A C <mrchewman@yahoo.com>
Sent: Friday, January 19, 2018 1:28 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP DEIR EA comments Updating RR ownership labeling

Hello There,

There are a number of places in the DEIREA where the railroad tracks/lines are referred to the Southern Pacific. Please update this. Union Pacific took over Southern Pacific in the case of freight lines. But, the Joint Powers Board purchased the tracks that Caltrains uses within this project area. Thus, in many cases, the use of Southern Pacific should be changed to the JPB/Caltrains.

Thank you. Drew

Response to Comment Letter 61: (Unknown last name), Drew (2 of 13)

The comment is correct; the Peninsula Joint Powers Board owns and operates Caltrain. The changes have been made in the Final EIR/EA where appropriate. In addition, the reference to Union Pacific was changed to SamTrans to reflect SamTrans purchasing the tracks in 1994.
Comment Letter 62: (Unknown last name), Drew (3 of 13)

From: A C <mrrewman@yahoo.com>
Sent: Friday, January 19, 2018 2:11 PM
To: SM 101 DEIREA Comments@DOT
Subject: 101 MLP DEIREA comments Additional Major Congestion Points Missing

Hello There,

After reviewing the DEIREA and attending the Public Meetings on this project, I believe there are three Major Congestion Points that need to be further documented and addressed as part of this project. They are the following:

- The Northbound 101 PM congestion due to the Hillsdale Ave exit traffic queuing on 101 NB since the Hillsdale Blvd intersections cannot handle the exiting traffic volumes. This is more than just the first traffic light problem. There is significant traffic congestion on East Hillsdale Blvd. that extends back to El Camino Real routinely. This congestion on 101 NB is additional to the NB 101 exit congestion for CA-92 interchange. In fact, at points during the PM commute, it is the Hillsdale Blvd exiting traffic that is causing the backup on 101 NB back to Ralston Ave and Holly St. 101 NB is flowing at speed to the CA-92 interchange after the mainline clears past the Hillsdale Blvd exit queue.

- The Southbound 101 PM congestion south of SFO before Millbrae Ave. This area is identified in the AL. The PM also consistently experiences congestion.

- The congestion on Southbound 101 at Hillsdale Blvd I believe is missing some context of the problem. There are three exit ramps merging into 101 SB in a short distance: CA-92 WB loop to SB 101, Fashion Island Blvd, and largely CA-92 EB ramp. Each one of these on-ramps are producing on-ramp volumes with their associated weaves onto the mainline lanes that are part of the problem/congestion at Hillsdale Ave. During the Public Meetings, discussions with staff said the congestion was under the Hillsdale Blvd Overcrossing. I believe this is missing the bigger picture immediately north of the overcrossing.

These need to be added in various parts of the DEIREA to ensure the project’s solutions/construction improves these congestion points as well. I my other submissions/comments, I will discuss some I believe reasonable ways to reduce these congestion points while staying within the projects scope/goals (e.g., no R/W purchases, no permits required for water encroachments, improving travel times, etc.).

Thank you,
Drew

Response to Comment Letter 62: (Unknown last name), Drew (3 of 13)

Each of the three points the comment raises are addressed in the following:

1. The TOAR identified the bottleneck between the westbound Hillsdale Avenue on-ramp and the SR 92 off-ramp. It states: “The queue from this bottleneck forms around 3:30 PM and starts reducing in the last hour of the PM peak period but does not completely dissolve during the peak period. It extends back to the segment between the Whipple Avenue Interchange and Woodside Road Interchange. A contributing factor to this bottleneck is the high demand on eastbound SR-
92, where traffic weaves and merges between the northbound and southbound ramps, causing a queue to spillback onto northbound US 101 in the rightmost two lanes.”

2. Section 2.1.8.2 (under the subtitle “Existing Conditions”) describes the existing congestion along the project corridor and lists the existing bottlenecks. The traffic analysis found that the bottleneck between the Millbrae Avenue off-ramp and westbound Millbrae Avenue on-ramp occurs during the PM peak period in the southbound direction. Under the No Build Alternative, this bottleneck would continue to occur in both 2020 and 2040. In addition, this bottleneck would also occur in the AM peak period in 2040 under the No Build Alternative. As summarized in Section 2.1.8.3, this bottleneck would be removed for both the AM and PM peak periods in 2020 and in 2040 under the Build Alternative.

3. The commenter’s opinions are noted. With the proposed project, in 2020 the southbound AM bottleneck at westbound Hillsdale Boulevard on-ramp and eastbound Hillsdale Boulevard on-ramp is anticipated to completely dissipate due to the improvements at the westbound Hillsdale Boulevard on-ramp.
Comment Letter 63: (Unknown last name), Drew (4 of 13)

From: A C <mr.drewman@yahoo.com>
Sent: Friday, January 19, 2018 2:48 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP DEBREA comments Reducing congestion NB101 at Hillsdale Blvd

Hello There,

After reviewing the DEIREA and attending the Public Meetings, one of the congestion areas not being addressed is the East Hillsdale Blvd exit traffic from northbound 101 in the evening/PM commute. This congestion at some point takes over the CA-92 exit congestion. Based on my observations, the northbound PM congestion starts with the CA-92 exiting traffic (cross weaving with on-coming East Hillsdale Blvd on-ramps). But, as the commute continues, the backup on 101 NB changes from CA-92 caused to the East Hillsdale Blvd exiting traffic caused. 101 NB will be flowing fine after the East Hillsdale Blvd off-ramp. This continues to cause the backup on 101 down to Ralston Ave, Holly St, etc. East Hillsdale Blvd does not have sufficient capacity for the exiting PM volumes and no project on the horizon has the possibility of significantly changing this. The problem will only get worst as more large developments come online in the area.

In keeping with the goals/scope of the project, please add a 2nd exit ramp along the AUX lane for East Hillsdale Blvd. Remove the mainline straight/split exit configuration and have two dedicated exiting lanes. This would pull significant exit traffic out of the mainline lanes which would improve flow and reduce travel times on the 101. This additional lane could be added just north of the soundwall that moves to the east a short distance after the Laurel Creek overcrossing. This addition will not require additional R/W purchase and no additional permits (e.g. water encroachment).

I later project could widen the bridge over the Laurel Creek and move the soundwall in that area east. There is R/W to do these things. With those two pieces, this new exit lane could become a 2nd AUX lane between Ralston Ave and East Hillsdale Blvd. One AUX lane could be from the EB Ralston loop on-ramp and the second AUX lane could be the WB Ralston on-ramp to 101 NB. Note, that since there is no local access/bridge between Redwood Shores and Foster City, 101 acts as a local street for those traveling between these to adjacent cities. This is an additional reason to have two AUX lanes in-between these two interchanges.

These additional lanes would have minimal relative construction cost given the R/W is there with the current soundwall not needing to be changed. However, this would have a significant benefit by helping to separate queuing exit traffic from the mainline lanes. This is as close as one can get to a true win-win in keeping with the goals of the project.

Thank you, Drew
Response to Comment Letter 63: (Unknown last name), Drew (4 of 13)

63-1

The commenter’s opinions are noted. Please see the response to Comment 62-1 regarding the bottleneck at Hillsdale Boulevard.

With regard to the second exit ramp, reconfiguring the East Hillsdale Boulevard Interchange is not within the scope of the proposed project, even if it could be completed within the existing State right-of-way. A project of this size would require its own independent utility and logical termini as well as independent traffic analysis and coordination with local jurisdictions. Therefore, it would constitute a separate project.

63-2

The comment suggests installing a second auxiliary lane between Ralston Avenue and East Hillsdale Boulevard. Dual auxiliary lanes would make it difficult for traffic from the on-ramp (right-side lane) to access the mainline (northbound US 101) as they would need to weave across the second auxiliary lane. The added complexity of this weave would add a potential congestion point and possible safety issues, and are therefore not recommended.
Comment Letter 64: (Unknown last name), Drew (5 of 13)

From: A C <mrdrewman@yahoo.com>
Sent: Friday, January 19, 2018 3:05 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP-DEIR EA comments-Reducing congestion SB101 at Millbrae Ave

Hello There,

For southbound 101 before Millbrae Ave, I believe there is an improvement that should be made that keeps with the goals of the project. Extend the SFO airport on-ramp setup into a second exit lane for Millbrae Ave. Currently, there are three merges onto SB101 before Millbrae Ave. Two from SFO terminals and one from San Bruno Ave. These all currently merge back into lane "5" from the I-380 on-ramp lane extension. This lane "5" becomes the exit only lane for Millbrae. During numerous hours, vehicles will travel in this "exit only" lane and merge back into the mainline at the last minute thus making the exit only lane nearly the same as a mainline lane.

There is enough R/W and no bodies of water being "touched" as well as the current bridge over one drainage channel is wide enough already. In fact, there is some pavement between the last SFO on-ramp and the Millbrae off-ramp beyond the shoulder currently, so there should be no need to disturb the earth embankment a short distance away. This is an easy win-win to help to separate the exiting traffic from the mainline traffic and thus improve the flow of both which reduces travel times.

The easiest change is take the last SFO on-ramp and don't have is merge into the exit only lane, just extend it. For those coming from SFO that are continuing south, there is only one additional lane weave. There is plenty of distance to make this maneuver. The exit at Millbrae Ave would remain two lanes, just two exit only lanes vs the mainline split in the current arrangement.

This will improve, i.e., reduce the congestion on SB101 especially as more development brings additional exiting traffic. For the additional short pavement/lane add, this is a great win-win contributing to the goals of the project and keeping within the constraints.

Thank you, Drew

Response to Comment Letter 64: (Unknown last name), Drew (5 of 13)

The commenter’s suggestion is noted. As shown in Appendix C Proposed Major Project Features Sheets 49-52, the proposed project would widen the freeway on southbound US 101 between the SFO on-ramp and the Millbrae Avenue off-ramp, which would likely preclude a second exit ramp for Millbrae Avenue.
Comment Letter 65: (Unknown last name), Drew (6 of 13)

From: A C <mrdrewman@yahoo.com>
Sent: Friday, January 19, 2018 3:19 PM
To: SM 101 DEIR/EA Comments@DOT
Subject: 101 MLP DEIR/EA comments Improving the 380 to SB101 merge

Hello There,

The current I-380 exit/on-ramp to SB101 is two lanes and with a "center set of lanes merge" configuration. I heard discussions about making this on-ramp only one lane vs its current two lanes. Please do no do this. There is plenty of traffic volumes to justify two lanes.

However, please change the merge setup. Please do not merge the "center" lanes but instead have two lanes come into/along 101 parallel to the mainline lanes. Then at the appropriate distance, drop the outside most lane. This configuration would be somewhat similar to the SOP on-ramp to SB101 from the domestic terminals. The appropriate distance would be keeping the lane as long as there was space and/or about 1/2-way before the San Bruno on-ramp traffic merge.

There is plenty of R/W in the area for this change. The current setup is a high-speed (i.e., 65mph) merge of two lanes. When I drive this route, this is one of the more dangerous zones for me given the current configuration: I-380 on a curve and downward slope under the San Bruno Ave overcrossing with a jersey barrier plus add in dark and or rain conditions. I believe adjusting the merge configuration would be a significant low cost safety improvement.

Thank you, Drew

Response to Comment Letter 65: (Unknown last name), Drew (6 of 13)

The comment suggests a merging configuration for the current I-380 exit/on-ramp to southbound US 101. If the two lane on-ramp from eastbound I-380 enters southbound US 101 as two lanes and then merges before some of this traffic can merge into the southbound US 101 through-lanes as suggested, this may create a bottleneck. If the southbound US 101 volume is low enough prior to the eastbound I-380 on-ramp, it is possible that a lane on southbound US 101 could be dropped so that the eastbound I-380 two lane on-ramp could continue onto southbound US 101.

While this interchange is not being considered for changes in the proposed project, it would not preclude a future project from considering this.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 66: (Unknown last name), Drew (7 of 13)

From: A C <mrdrewman@yahoo.com>
Sent: Friday, January 19, 2018 3:32 PM
To: SM 101 DEIR EA Comments@DOT
Subject: US 101 MLP DEIREA comments extending the AUX lane SB101 at Hillsdale

Hello There,

Reviewing the DEIREA and discussions at the Public Meeting, I appreciate the plan to extend the AUX lane on SB101 at East Hillsdale Blvd farther north. Currently, it starts with the farther SB on-ramp. My understanding, in the future, it will start from the WB East Hillsdale Blvd loop on-ramp to SB101. This will be a much appreciated change. The traffic on the mainline is still congested at peak times in this area. This weave I’m sure contributes to the congestion along the mainline lanes. Thus, adding a lane and removing a forced weave should improve the mainline traffic speeds.

66-1

(A later project could widen the bridge over Laurel Creek. Once this is done, there could be two AUX lanes between East Hillsdale Blvd and Ralston Ave on SB 101. Each on-ramp from East Hillsdale Blvd would have it own AUX lane until Ralston Ave were the current two lane exit would remove both lanes. This would help reduce exiting traffic from the mainline lanes at Ralston Ave (i.e., the current configuration), thus improving travel times. There is plenty of R/W in this stretch, and the current soundwalls would not need to be touched. Also, given there is no bridge between Redwood Shores and Foster City, local traffic has to use 101 to travel between these two adjacent cities. This is an additional reason to have a 2nd AUX lane between these two interchanges.)

Thank you, Drew

Response to Comment Letter 66: (Unknown last name), Drew (7 of 13)

66-1

The commenter’s response is noted. Please see the response to Comment 63-2 for a discussion of dual auxiliary lanes.
Comment Letter 67: (Unknown last name), Drew (8 of 13)

From: A C <mr.drewman@yahoo.com>
Sent: Friday, January 19, 2018 3:42 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP DEBREA comments: Don’t extend on-ramp lane to Kehoe Ave

Hello There,

Currently, there are three lanes of traffic coming from WB CA-92 and Fashion Island Blvd on-ramps onto NB101. These three lanes merge down to one lane before the Kehoe Exit. Please extend the second lane to the Kehoe exit and make it an exit only lane. The R/W is available. The pavement is nearly all there already. This will provide additional capacity in this area. For folks needing to exit at Kehoe, having an exit only lane will help reduce delays from NB101 back-ups that extend past the exit. People have to choose to wait in traffic or drive on the shoulder.

This addition is in keeping with the constraints of the project (e.g., no R/W purchase, no additional permits, minimal cost, etc.) while adding value to the project with improved travel times and additional roadway capacity.

Thank you, Drew

Response to Comment Letter 67: (Unknown last name), Drew (8 of 13)

67-1

The proposed project would occupy some of the available right-of-way stated in the comment by widening northbound US 101. In order to accommodate the extension of the acceleration lane from Fashion Island Boulevard to Kehoe Avenue, additional right-of-way acquisition would be required. The proposed project features would therefore prevent extending the existing acceleration lane. In addition, dual auxiliary lanes are not recommended. Please see the response to Comment 63-2 for a discussion of dual auxiliary lanes.
The commenter is correct that evaluating an HOV or express lane connector from US 101 to SR 92 is being studied by SMCTA (as described in the response to Comment 9-6).

With regard to CHP observation areas, the proposed project would include a CHP observation area somewhere on US 101 between Oregon Expressway/Embarcadero Avenue and Colorado Avenue. The final determination of where the observation area would be placed will be made by Caltrans in coordination with CHP. However, the observation area would not use all of the median for the entire span. It would be limited to the space needed for the CHP observation area and the rest of the median would be free. The proposed project is widening in the median only where necessary. Wherever space allows, maximum shoulder area shall be provided.
Hello There,

I appreciate the team's effort to add back the AUX lanes in much of the project area. The AUX lanes have improved my and many others' travel times significantly over the past years.

For the areas not getting the AUX lanes added back, my understanding traffic volumes do not warrant them. In addition, for example, in some cases if added back I believe a permit from the Bay Area Water Quality Board (or similar group) would be required to work near the body of water between Peninsula Ave and Broadway. Thus, I understand the strong incentive to not have this as part of the project.

However, in the opposite vein, please do not preclude a later project from doing this work. The traffic projection volumes could be wrong and/or growth could change things. Thus, the lack of these replacement AUX lanes could prove to be painful and counter to improving the travel times if they become bottlenecks. Thus, in areas were the AUX lanes will be taken out, try to allow for future add-backs by your design/construction efforts now to minimize future redo construction efforts.

For example, between Whipple Ave and Woodside Rd, the AUX lanes are being removed. However, there is enough R/W in this stretch and the bridge over slough is wide enough already potentially. If a replacement bridge was built for the Maple St overcrossing that had longer spans, the AUX lanes could be returned in this stretch. I believe Maple Street's overcrossing might be the constraint that can't be overcome at this time. Otherwise, the AUX lanes could be added back in this section. (At some point this bridge will need to be "rebuilt" given its age and condition versus current design requirements.) It is true the center line of 101 may need to be adjusted somewhat in the stretch along E. Bayshore Rd, but there is sufficient R/W on the west side of 101.

Thank you, Drew

Response to Comment Letter 69: (Unknown last name), Drew (10 of 13)

The commenter's suggestion is noted. Thank you for this information.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter 70: (Unknown last name), Drew (11 of 13)

From: A C <mrdrewman@yahoo.com>
Sent: Friday, January 19, 2018 5:01 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP DEREA comments extending AUX lanes to loop ramps

Hello There,

There currently are 5 loop ramps that merge into the mainline lanes where an additional on-ramp starts the AUX lane. The locations are the following:
- Millbrae Ave WB to SB 101
- East Hillsdale WB to SB 101
- Marsh Ave WB to SB 101
- Marsh Ave EB to NB 101
- Ralston Ave EB to NB 101

In the East Hillsdale WB to SB 101 case, my understanding based on conversations at the Public Meeting, starting the AUX lane with this on-ramp is a change coming.

70-1 In the Millbrae Ave WB to SB 101 case, supposedly the traffic volumes are low that the merge into the mainline lanes isn’t causing the part of the back-up there. I would wonder about that. Any merging in a congested area will be adding to the congestion farther upstream. If the volumes are low, why not just make that the beginning of the AUX lane and merge in EB Millbrae on-ramp traffic. The way the merge is already pointed in this area is nearly there. There is no additional pavement required, no R/W purchase, etc. just adjust the merge setup. This would align with helping to improve travel times and there is a bottleneck in this area already, so any improvement would be in keeping with the project goals.

70-2 In the case of the Marsh Ave WB to SB 101, having the AUX lane start here could be helpful or extending the current merging lane would help too. Having to go from a full stop to mainline speed can be a challenge. There is R/W to adjust and improve this area.

70-3 In the case of the Marsh Ave EB to NB 101, it is similar to the other loop situation just stated. However, another option would be to start the AUX lane with the loop and add a 2nd “merging” lane with the EB Marsh on-ramp and have this new lane end before the soundwall transitions to next to 101. A future project that moves the soundwall (similar to what is occurring in San Mateo/Burlingame with this project) could extend this 2nd lane into a 2nd AUX lane north to the Woodside Rd exit. There is significant traffic traveling between these two interchanges so the 2nd AUX lane would be used. One can make a case either way to include now or later. While no major R/W would be required (similar again to San Mateo/Burlingame), perhaps future traffic volumes still do not warrant this additional lane.
The analysis of the Build Alternative indicates that with the proposed express lane, southbound US 101 at Millbrae Avenue would no longer experience a bottleneck in future conditions. With the addition of the proposed express lane, this location is not expected to constrain traffic volumes on the freeway or merging onto the freeway.

The commenter's response is noted. The Build Alternative proposes to convert the existing HOV lane to an express lane at this location to address the purpose and need of the project. In addition, the analysis did not detect a bottleneck at this location; therefore, extending the auxiliary lane back to the westbound Marsh Road loop on-ramp would not be anticipated to reduce delay on the US 101 mainline. However, the proposed project would not preclude a future project from considering this.

The Build Alternative proposes converting the existing HOV lane to an express lane at this location. In addition, this location would not experience a bottleneck, and extending the auxiliary lane to the eastbound Marsh Road loop on-ramp as suggested in the comment would not reduce the delay on the US 101 mainline.

Please see the response to Comment 63-2 which discusses dual auxiliary lanes.

Thank you, Drew

Response to Comment Letter 70: (Unknown last name), Drew (11 of 13)

In the case of Ralston Ave EB to NB 101, there is congestion in this area in the WM direction. Starting the AUX lane with this on-ramp could be helpful to reduce merging into the mainline for those wanting to get into the AUX lane to exit at East Hillsdale. There is R/W to start the AUX lane earlier. This includes allowing for a long merge area with the WB Ralston on-ramp traffic. A previous project built an extended and wide shoulder in this area that isn’t being used and won’t be used even with the 101 added lane project here. In addition, a follow-up project that included a bridge widening over Laurel Creek and moving the soundwall in the area could allow a 2nd AUX lane to be added to the East Hillsdale Blvd exit.

These are improvements that for the current project do not require additional R/W and keep within the project goals.

Please see the response to Comment 63-2 which discusses dual auxiliary lanes.
The comment is correct that on southbound US 101, with the proposed project, the existing auxiliary lane between Whipple Avenue and Woodside Road would be converted to a general purpose through lane which would drop at Woodside Road. The proposed project does not include rebuilding the Maple Street overcrossing in Redwood City, or move any sound walls at that location.

As part of Caltrans Value Engineering and Constructability overview, the Caltrans design team will evaluate various stage construction scenarios including those suggested by the commenter.
Comment Letter 72: (Unknown last name), Drew (13 of 13)

From: A C <mrdrewman@yahoo.com>
Sent: Friday, January 19, 2018 6:19 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP DEREA comments SB101 between Woodside Rd & Marsh Rd

Hello There,

Given the goals of this project and how it is being implemented in the City of San Mateo, why between Woodside Rd. & Marsh Rd are additional lanes not being added. Especially in the SB direction, 101 gets congested due to the exiting traffic at Marsh Rd. On the initial stretch there is enough R/W to easily add an additional lane. The next stretch in-front of some businesses would be tight, but moving the soundwall a bit, this stretch is short, and given the minimums being used other places on this project, wouldn’t an additional lane fit in here. On the third stretch the soundwall could be moved more to the west like is being done in Burlingame and San Mateo. This would allow for getting a double exit lane setup separate from the mainline lanes.

72-1

If that is too big for this project, a first step could be moving the soundwall to the west/south to be along the frontage road where Rolison Rd is farther from the current soundwall. This would allow adding a second exit lane which would provide more space for queuing vehicles to not be stopped in the mainline lane. The current AUX lane along with the new exit lane would exit at Marsh Rd. Thus, the mainline/exit lane split would be removed. This would improve travel times by reducing the queue length on the mainline lanes.

A later project could pull/extend this exit lane back to Woodside Rd. With an additional extension through the Woodside Rd interchange where the current mainline and shoulder lanes have space for an additional lane. This "new" mainline lane could be an extension from the current mainline drop off giving a full through lane to Marsh Rd.

Thank you, Drew

Response to Comment Letter 72: (Unknown last name), Drew (13 of 13)

72-1

The dual auxiliary lanes suggested in this comment are addressed in response to Comment 63-2.

In addition, there does not appear to be room to widen the freeway near the southbound US 101 off-ramp to Marsh Road. Congestion from this off-ramp extends upstream beyond the Woodside Road on-ramp and therefore, the congestion would still spill back onto the mainline through lanes with the comment's suggestion. Therefore, the suggestion is not included in the proposed project.
Comment Letter 73: Joe Vollert

Feedback:
I back this project 100% - I appreciate Caltrans effort to fast track this project. I strongly encourage Caltrans to begin to think of what's next - what's the next step after this in 10 years? This mitigates today's problem (congestion) and it seems that there is no way to expand lanes with our current model/thinking.

Rather than addressing today's problems, how might we create options that explore completely new transportation opportunities:
- How do autonomous vehicles affect traffic?
- How would we handle flying cars (airports in some parts of the world by 2021)?
- How might we become a hub of transportation innovation?
- What other options? Jubilee leader lanes? "Create" other highways out of existing roads (El Monte, for example)?
Response to Comment Letter 73: Joe Vollert

73-1

The commenter’s support for the proposed project is noted.

73-2

The comment addresses future conditions with regard to the proposed project. The traffic and other environmental studies did consider future years. The project analysis used 2020 as the opening year for the proposed project, and 2040 as the design year in the EIR/EA, a study period that incorporates the time frame suggested in this comment.

The project corridor is not expected to degrade from the use of autonomous vehicles (AVs) in the future. The current US 101 facility serves various types of vehicles, some of which are partially autonomous. Research suggests that the widespread use of autonomous vehicles in the future will result in more efficient transportation systems, assuming AVs develop as a safe, acceptable, and dependable mode of transportation. Therefore, the US 101 corridor, including the project improvements, would be compatible with the use of AVs.

The purposes of the proposed project include encouraging carpooling and transit use, improving person throughput, and reducing congestion in the corridor for surface transportation. Flying cars are not an available option, and are not considered a reasonable or viable alternative within the study years evaluated for this project for the US 101 corridor. Aviation alternatives are currently available in the Bay Area at existing airports, including near the US 101 corridor at the SFO and San Carlos airports.

Transportation innovation has been strong within the Bay Area and the peninsula, and efforts continue to expand services. Existing options near the corridor include Caltrain rail and SamTrans bus service. BART serves the northern portion of the peninsula and greater Bay Area. Ferries serve terminals located along the Bay shoreline from South San Francisco to the north and east Bay. Many private companies are also now providing bus services for their employees, including within the peninsula. These services are expanding as funding is available and based on local and regional transportation planning. The US 101 freeway corridor is one element of this transportation network.

73-3

The evaluation of alternatives focuses on feasible alternatives that can reasonably be implemented. Double decker freeways are extremely costly projects due to the intensive structure requirements, and can introduce adverse environmental impacts on US 101 along the Bay shoreline, such as visual intrusion and increased noise. Creating other highways out of existing roads such as El Camino Real presents constraints such as right-of-way and private property acquisitions. The proposed project has been designed to minimize impacts on the environment to the extent feasible.
Comment Letter 74: A Concerned San Mateo Resident (2)

From: Aimee WCrollenekate <whitechocolatesk8@gmail.com>
Sent: Thursday, January 11, 2018 4:40 PM
To: SM 101 DEIR EA Comments@DOT
Subject: SM 101 - Managed Lanes Project (MLP) - Public Comment

Dear CalTrans,

I’m writing to express my concerns about the proposed managed lanes along Hwy 101. The plan does not account for driver behavior, and poor layout of freeway entrance/exit lanes. You’re talking about spending millions of dollars, while none the real issues are addressed.

I would urge all of you to do some travelling to see more successful freeway layouts. Specifically, Detroit. While they don’t have the density the Bay Area sees, I believe their setup would be much more effective at handling it.

74-1

Their freeway exit and entrance ramps are placed better so that you don’t have people trying to merge in and merge off at the SAME TIME. in Detroit, cars exit the freeway, and entrance ramp occurs after so that those cars are cleared before drivers merge ON.

Bay Area Ramps are positioned ENTRANCE and EXIT in close proximity
A more efficient layout would be the opposite. EXIT then ENTRANCE.

74-2

Short of these major structural overhauls, you also need to consider the drivers themselves.

74-3

First, there is the obvious disadvantage to those barely struggling to LIVE in the Bay Area, much less have to pay for the privilege of not spending a 2-4 hours in their cars every day. Setting up a “Pay to play” system is utterly unfair at its CORE.

74-4

Second, there is driver behavior that should be curbed, otherwise it will only continue with the additional lane.

- Diamond lanes are already abused - We need increased enforcement to deter those seeking to gain the system.
- Adopt and ENFORCE a left lane passing only law. Many states already do, it’s shocking that a leader like California doesn’t have this law established already. Much of the congestion I’ve seen is caused by distracted drivers and those who want to coast at 35-40 mph in the left lane and the drivers wanting lanes to try to get around them. This is a MAJOR problem. Again, we need to consider “Slow-Poke Laws” with real penalties for drivers.

Currently what you’ve proposed is only a very expensive band-aid. I hope you will consider these factors into your plan.

Regards,
A concerned San Mateo resident
2727 Edison St.
San Mateo, CA 94403

Response to Comment Letter 74: A Concerned San Mateo Resident (2)

The commenter’s opposition to the project is noted. Caltrans designs interchanges according to the Caltrans Highway Design Manual (available at www.dot.ca.gov/design/manuals.hdm.html), which requires one mile spacing between interchanges in urban areas and allows for intersections of varying types depending on speed, volume, and composition of traffic to be served. The purpose of the one mile or more spacing is to allow adequate time for cars to merge on or off the freeway. The location of interchanges is also determined by where major local roads should provide access to the freeway system, and within more densely populated areas such as San Mateo and Santa Clara counties, there are more interchanges and associated on- and off-ramps to allow greater access.

The comment is noted. The proposed express lanes would be voluntary; when capacity allows, SOVs would be able to use the lanes by paying a toll. HOV 3+ vehicles and buses would be able to use the lanes toll-free. The proposed project would not reduce the number of existing toll-free general purpose lanes along the corridor; the express lane would be added to the existing facility.
Several comments have been raised regarding the fairness and equity of express lanes. Please refer to the response to Comment 38-1 for this discussion.

74-3

The proposed project would use a combination of monitoring equipment and CHP monitoring areas for enforcement of the express lane. Please see Section 1.4.1.2 and 1.4.1.3 of the environmental document for more details. The CHP enforces the current HOV lane to the extent practicable. It is anticipated that toll revenues from the proposed express lanes would be able to provide some funding for increased CHP enforcement of the lane as part of operating the lanes.

74-4

The vast majority of states in the U.S. have laws that indicate that slower traffic should keep to the right lanes on multi-lane highways. In California, Vehicle Code Section 21654 states that a vehicle being driven at a speed less than the normal speed of traffic in the same direction that is not traveling in the right-hand lane would be considered in violation.

Comment Letter 75: Matt Zientek

From: Matt Zientek
To: SM 101 DEIR EA Comments@DOT
Subject: In support of the express lane project
Date: Tuesday, December 05, 2017 10:28:12 AM

Hello,

75-1

I would strongly support adding any measures that could reduce congestion for carpoolers on 101 in San Mateo county.

I commute 5 days/week on 101 via bus, but most cars I see on the road every day have a single occupant. Anything we can promote to take fewer single drivers off the road and give priority to carpoolers would both reduce commuting time, and provide environmental benefits.

Thanks,
Matt

Response to Comment Letter 75: Matt Zientek

75-1

The commenter's support for the proposed project is noted. The proposed project would give carpoolers and buses priority in the express lane by charging a toll for SOVs wishing to use the express lane. In addition, toll increases for SOVs would be used to maintain the minimum average operating speed of 45 mph for HOVs. If the express lane reaches capacity, only HOVs would be allowed into the lanes. Please see the response to Comment 16-7 for more details about priority use of the managed lanes.
Comments Received on the Recirculated Partial Draft EIR/EA

1.5 Comments from Local Agencies/Elected Officials

Comment Letter R76: David J. Canepa, San Mateo County Board of Supervisors

From: Bill Silverfarb <bsilverfarb@smcgov.org>
Sent: Wednesday, August 08, 2018 11:57 AM
To: SM 101 DEIR EA Comments@DOT
Subject: U.S. 101 Managed Lanes Project comment

DAVID J. CANEPA, SAN MATEO COUNTY SUPERVISOR
400 COUNTY CENTER, REDWOOD CITY, CA, 94063

Aug. 7, 2018

California Department of Transportation, District 4
Attn: Yolanda Rivas
By e-mail at SM101DEIR_EA_comments@dot.ca.gov

Dear Ms. Rivas

I am writing to comment on the Recirculated Partial Draft EIR for the U.S. Highway 101 Managed Lanes Project in San Mateo. Though I currently serve as San Mateo County Supervisor, these are my personal comments. Our Board has not discussed this project.

I oppose both the no-build and build alternatives currently being recirculated for comment. For Caltrans to conclude that creating a toll lane through San Mateo County is the only way to ease congestion is absolutely preposterous. It is especially troubling since no regional board such as the San Mateo County Transportation Authority or C/CAG have had any say on the current two proposals.

As an elected official and a member of the C/CAG board, I represent more than 750,000 San Mateo County residents who have not had an opportunity to discuss or vote on the project at any phase of development. This proposed $554 million project, in fact, has been discussed very little in public.

Allowing solo drivers to access a toll lane for a quicker commute does not take cars off the highway nor does it reduce greenhouse gas emissions. The goal should be to get more people into fewer vehicles as they commute. A toll lane does not achieve this.

In 2016, Senate Bill 32 was signed into law. It codifies the GHG reduction targets in California to achieve a mid-range goal of 40 percent below 1990 levels by 2030.

According to the final environmental impact report for Plan Bay Area 2040 published in March 2018, the Metropolitan Transportation Commission and Association of Bay Area Governments concludes that implementing Managed Lanes build alternative will have “significant and unavoidable” impacts on SB 32’s goals.

To mitigate these impacts, MTC and ABAG suggest partnering with the Bay Area Air Quality Management District to work with counties and cities to adopt “qualified GHG reduction plans.”

Suggested mitigation measures include: “installation of renewable energy facilities on houses and businesses, construction of community-serving facilities such as small-scale solar farms, or other actions.”

Other GHG reduction mitigations include: “Zero Net Energy (ZNE) in new construction, retrofits of existing buildings, incentivizing and development of renewable energy sources that serve both new and existing land uses, and other measures so long as the overall (SB) 32 ... reduction (by 2040) can be demonstrated.”

That’s a tall order to simply accommodate solo drivers. It’s also a direction toward gridlock. And as a member of the BAAQMD board, I know that most GHG emissions in the Bay Area are generated by vehicles on the road.
Caltrans needs to recirculate the Draft EIR that includes the final four alternatives staff considered before opting for toll lanes. The State Department of Transportation is forcing this project onto San Mateo County and I, without a vote in the matter, oppose it entirely. If C/CAG and the TA are truly partners in this project, then its respected boards should have the option to vote the alternatives either up or down.

In friendship,

DAVID J. CANEPA
San Mateo County Supervisor, District 5

Bill Silverfarb
Legislative Aide
Office of Supervisor David J. Canepa
County Government Center
400 County Center, 1st Floor | Redwood City, CA 94063
Phone: (650) 363-4342 | Fax: (650) 363-1916 | Billsilverfarb@smcgov.org

Visit our office online: 🎥📸🐦 바랍니다

Note: This commenter also submitted an email correspondence to other commenters. This email is not a comment on the Recirculated Partial Draft EIR/EA and therefore is not included; however, it is part of the administrative record for the project and is available upon request.

Response to Comment Letter R76: David J. Canepa, San Mateo County Board of Supervisors

R76-1

Commenter’s opposition to the alternatives is noted.

Both the San Mateo County Transportation Authority and C/CAG staff have been involved in the project, as members of the Project Development Team. Caltrans staff have coordinated with SMCTA and C/CAG staff throughout the development and review of the project.

R76-2

As described in Section 1.2.2, planning for the proposed project has been on-going at the local and regional levels since the completion of a Caltrans Project Study Report/Project Development Support (PSR-PDS) in May 2015. Following the completion of the PSR-PDS, the San Mateo County Transportation Authority (SMCTA) Board of Directors advanced the start of traffic and other technical studies for the proposed project and initiated stakeholder outreach, including discussions with Caltrans, the MTC and the C/CAG. As a result of the outreach effort, the project limits were extended seven miles south to a total length of 22.5 miles to connect with the recently approved VTA express lanes project in Santa Clara County. This would create a continuous express lane through the majority of Santa Clara and San Mateo counties.
In addition, a Draft EIR/EA and a Recirculated Partial Draft EIR/EA have both been circulated for public review and input on the proposed project. Both documents were made available for public review on line as well as at multiple locations throughout San Mateo County. Also, a scoping meeting (in the City of San Mateo) and informational meetings were held during preparation of the studies, and three public meetings were held (one in Redwood City, one in the City of San Mateo, and one in Millbrae) to allow the public an opportunity to review and comment on the Draft EIR/EA for the proposed project.

Finally, the SMCTA Board of Directors, C/CAG Board of Directors, and the C/CAG Congestion Management Program Technical Advisory Committee (CMP TAC) have undertaken project-related actions, among others, in noticed, public meetings at which members of the public were invited to (and often did) comment:

- October 1, 2015: The SMCTA Board approved Resolution 2015-19 allocating funds for the Project Approval and Environmental Document (PA&ED) phase, of which this EIR/EA is part.
- June 2, 2016: SMCTA Board approved Resolution 2016-12 allowing SMCTA to act as a project sponsor.
- September 15, 2016: CMP TAC received an update on the project.
- October 13, 2016: SMCTA Board received an update on the project, including information on the planned public scoping meeting to be held October 27, 2016 at the San Mateo City Hall.
- November 10, 2016: C/CAG Board approved Resolution 16-42, making C/CAG a co-sponsor of the PA&ED phase.
- October 12, 2017: SMCTA Board received a presentation on the project development process for the project, including planned release of the Draft EIR/EA.
- October 19, 2017: CMP TAC received a presentation on the project development process.
- November 9, 2017: SMCTA Board received information and update on the project, including consideration of alternatives.
- November 16, 2017: CMP TAC received an update and discussion on the project.
- February 1, 2018: SMCTA Board approved Resolution 2018-05 allocating $22 million from New Measure A funds for the project Design/Right-of-Way phase.
- April 12, 2018: C/CAG Board approved Resolution 18-16 extending C/CAG’s partnership with the SMCTA to the Design/Right-of-Way phase.
- June 21, 2018: CMP TAC received information on the proposed toll operations.
- July 12, 2018: C/CAG Board approved Resolution 18-44 authorizing certain agreements with the California Transportation Commission and Federal Highway Administration.

Other project-related actions will be considered at future SMCTA Board, C/CAG Board, and CMP TAC meetings, which will be publicly noticed and open to public comment.
Please see the responses to Comments 6-4 and 16-7 for a discussion of how the proposed project would encourage carpooling and transit usage and thereby increase person throughput more than the No Build Alternative and more than other alternatives that were studied, including Alternative 2, an HOV-only alternative.

As noted in Section 3.1, Climate Change, in the Recirculated Partial DEIR/EA, in March 2018, ABAG and MTC prepared an Addendum to the Final EIR for Plan Bay Area 2040 to update the cost and description of the US 101 Managed Lanes Project only. The project had been previously included in the RTP/SCS’s financially constrained transportation investment strategy and Final EIR.

Specifically, the Addendum clarified the project description and changed lane configuration assumptions along the proposed project corridor to accommodate the express lane in each direction. As shown in the Addendum to the Final EIR for Plan Bay Area 2040, the proposed project has been included in the projects planned to be built in the Bay Area, and there would be no new impacts to GHG emissions that were not previously disclosed in the Final EIR for Plan Bay Area 2040 (ABAG and MTC 2018, and Section 3.1 of this Final EIR/EA).

The commenter is incorrect in stating that MTC and ABAG concluded that implementing the proposed project would have a significant and unavoidable impact on greenhouse gases. Rather, MTC and ABAG concluded that full implementation of all of the projects considered in Plan Bay Area 2040 would have significant and unavoidable impact to greenhouse gases, and the proposed project was just one of those many projects. The Final EIR for Plan Bay Area 2040 found that implementation of the Plan would need to achieve additional reductions in emissions to meet statewide GHG reduction goals for 2040 and 2050. Mitigation measures were included in the Final EIR for Plan Bay Area 2040 to further reduce emissions. The proposed project is not inconsistent with those mitigation measures.

For this proposed project, the analysis of GHG emissions determined the US 101 Managed Lanes Project would not result in a significant impact; please refer to Section 3.1.

Please see the response to Comment R76-4 for a discussion of MTC and ABAG’s Plan Bay Area 2040 EIR and mitigations.

Please see the response to Comment 6-2 for a discussion of the process of elimination of previously considered alternatives.
Comment Letter R77: Sam Hindi, City of Foster City

August 15, 2018

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

Dear Ms. Rivas;

On Monday, August 6, 2018, the City Council of Foster City held a discussion on the U.S. Highway 101 Managed Lanes Project as part of the public comment process on the Recirculated Partial Draft EIR/EA for the project. The purpose of this letter is to express Foster City's opposition to the Highway 101 Managed Lanes Project as currently proposed. The reasons for our opposition are identified below.

- **Single Occupancy Vehicles (SOV) in Express Lane Discourage Ridesharing and Public Transit** – We are opposed to allowing single occupancy vehicles to pay into express lanes. Creating more capacity for SOV's via express lanes will not take cars off the highway nor reduce greenhouse gas emissions. We should strive to get more people into fewer vehicles as they commute. A toll lane does not accomplish this objective.

- **Tolling Component Further Burdens Lower-Income Families** – We are opposed to the express toll lane component of the project because it unfairly burdens people with lower-incomes. The highways are public and funded by all taxpayers. Charging the same toll rate, regardless of economic status, will have a greater impact on low-income individuals. This is especially significant given the higher housing costs in San Mateo County. More Bay Area families are required to utilize more of their take-home pay for housing, leaving less for other essentials including transportation.

In summary, we believe that additional carpool lanes to accommodate more high capacity vehicles would be best to help reduce traffic congestion challenges along Highway 101. We acknowledge that the Highway 101 Managed Lanes Project is not part of the Get Us Moving San Mateo County initiative that will be considered on the November 2018 ballot. We appreciate your efforts in addressing regional traffic congestion and look forward to working with you in the future.

Sincerely,

Sam Hindi, Mayor
City of Foster City

cc: Don Horsley, President Board of Supervisors District 3, San Mateo County
    Sandy Wong, Executive Director, City/County Association of Governments
Response to Comment Letter R77: Sam Hindi, City of Foster City

R77-1

The commenter’s opposition to the proposed project is noted.

R77-2

The proposed project would not discourage ridesharing and public transit. Please see the response to Comment 6-4 for more information on how the proposed project would increase person throughput and encourage carpooling.

R77-3

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.

R77-4

The commenter’s opposition to the proposed project is noted.
Comment Letter R78: Lenny Siegel, City of Mountain View

From: Lenny Siegel
To: SM 101 Managed Lanes Comments@DOT
Subject: Comments on Managed Lanes project
Date: Monday, July 30, 2018 5:24:31 PM
Attachments: Siegel toll lanes comments.pdf

Please see my attached personal comments.

Lenny Siegel

Lenny Siegel
650-961-8918
Mayor of Mountain View, California
LennySieg@gmail.com
http://lennysiegel.users.sonic.net/web/
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Lenny Siegel
269 Loreto Street, Mountain View, CA 94041 USA 650-961-8918 <lemysiegel@sonic.net>

July 30, 2018

California Department of Transportation, District 4
Attn: Yolanda Rivas
By e-mail at SM101DEIR_EA_comments@dot.ca.gov

Dear Ms. Rivas

I am writing to comment on the Recirculated Partial Draft EIR/EA for the U.S. Highway 101 Managed Lanes Project. Though I currently serve as the Mayor of the City of Mountain View, these are my personal comments. Our City Council has not discussed this project.

I find the Recirculated Partial Draft confusing. Filled with models and relying on references to other document, it obfuscates the central purpose of the preferred alternative. It is designed to encourage affluent drivers to drive greenhouse-gas-emitting single-occupancy vehicles (SOVs) by creating a complicated, expensive mechanism for collecting tolls.

It would be much more equitable and environmentally sustainable to abandon the toll lanes and focus on expanding capacity for high-occupancy and electric vehicles.

Page 3-15 of the draft states that the project would not significantly “Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system....” For Mountain View, at least, I believe this is not true. For example, Mountain View has adopted plans to allow for the development of 3.5 million additional square feet of office space and 9,850 new housing units in our North Bayshore area, along U.S. 101 at the southern edge of the Managed Lanes project. We are planning for retail, schools, parks, and transit. To minimize traffic and limit greenhouse-gas emissions, we have adopted enforceable restrictions on the use of single-occupancy vehicles.

The Managed Lanes project, on the other hand, has the potential to pour large numbers of SOVs onto our streets. That is, the project is working against our best efforts. The draft does not address this impact.

It appears to me that the project is simply designed to generate revenues for transportation and transit investments. That’s a worthy goal, but there are other ways to generate such revenues—such as taxing employers that are to a good degree responsible for the growth in Bay Area traffic—without promoting unsustainable traffic and aggravating the impacts of income inequality.

Sincerely,

Lenny Siegel
Response to Comment Letter R78: Lenny Siegel, City of Mountain View

R78-1

The Recirculated Partial Draft EIR/EA circulated in July 2018 contains only revised information; all other information remained the same. This was explained in the preface of the Recirculated Partial Draft EIR/EA. The project analysis does utilize a traffic model to provide information on how US 101 will operate under No Build and Build Alternative conditions. The results of the analysis are consistently presented in the Draft EIR/EA, the Recirculated Partial Draft EIR/EA, and this Final EIR/EA.

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.

Please see the response to Comment 16-7 for a discussion of how the proposed project prioritizes HOVs.

R78-2

With the proposed inclusion of managed lanes (which prioritize HOVs), the Build Alternative is anticipated to encourage carpooling. The traffic analysis performed for the project demonstrates that more HOV’s would use the freeway with the Build Alternative than would occur with the No Build Alternative (refer to the 2020 and 2040 SOV/HOV Comparison subsections, in Section 2.1.8.3). The proposed project is also anticipated to encourage traffic to use US 101 instead of local roadways (such as in the City of Mountain View) and parallel routes. This is described further in the response to Comment 6-4. Therefore, the proposed project would not conflict with adopted City of Mountain View plans.

R78-3

The commenter’s opposition to the project is noted. The purpose of the project is not to generate taxes, and Caltrans does not have the authority to implement taxes.

The purpose of the proposed project is to:

- Encourage carpooling and transit use;
- Improve travel time reliability for HOV/express lane users;
- Increase person throughput (the number of people moved);
- Apply technology and/or design features to help manage traffic;
- Reduce congestion in the corridor; and
- Minimize operational degradation of the general purpose lanes.
I.6 Comments from Organizations

Comment Letter R79: Gladwyn d’Souza, Sierra Club, Loma Prieta Chapter

Dear Caltrans,

Thank you for the opportunity to comment on the Recirculated Partial Draft Environmental Impact Report (EIR)/Environmental Assessment (EA) for the 101 Managed Lanes project which was prepared in accordance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). I will call it the rEIR for short (recirculated draft EIR). The comments received should have been included as an addendum to this rEIR. The rEIR says the comments have been attached to the Nov EIR.

The rEIR starts out by saying why the other alternatives won’t work with respect to the selected alternative. The alternatives rejected show the inadequate results of piecemeal planning. Take for example the analysis posted under 1.A.3.1 HOT 3+ – Convert a Lane Alternative (Alternative 3). Analyzing conversion, as a series of piecemeal road projects eventually connected into a network, would have been similar to how the HOT lane network is being constructed and analysed. That is not what was done for the converted lanes here.

Instead the analysis sees conversion as a one off project mysteriously starting in Redwood City and ending at I380, with no network in sight to design a conversion plan around. El Camino Real (ECR), aka HWY 82, one of the roadways where spillover is calculated (pages 1-6, 1-7) from conversion, is a roadway crying out for conversion of a general purpose lane to a bus only lane along with separated bicycle lanes. All the parallel routes with shifted traffic specified would benefit from conversion that made options to congestion viable. A network of converted lanes would thus result in all the benefits mentioned in the analysis (mode shift, technology, smaller footprint) and additionally lower emissions meeting larger public goals for health, GHG reduction, and livability. The analysis of the alternative is faulty, meant to fail, to bias the chosen option of the project and make the emissions an unfortunate consequence.

Another failure in the analysis is the lack of specifics how the traffic will shift from 101 to parallel routes like ECR. This shift occurs on east west routes within San Mateo County. These roadways have been overly impacted with autos under existing condition. They will continue to be impacted under the proposed selected alternative. Conversion, within a network, could have analyzed how these roads too would function within a plan. Worse there is no quantification of the impact of induced traffic from the proposed selected alternative on these east west or parallel roads as currently occurs from the Intelligent Transportation System.

The rEIR does look at population (page 3-16) but fails to say how a network of converted lanes could address the expected congestion with feasible options like expresses buses frequency, separated bike lanes, etc. Instead the analyses is predictive of major congestion in the future that would be addressed with the same piecemeal planning ad infinitum. This is a failure of the rEIR to meet the basic goals of reducing congestion in the region.

The rEIR says that existing conditions show that traffic congestion has largely increased in the project corridor. Making Alternative 3 work would have been to the advantage of the project objectives. Since the project is inconsistent with the Metropolitan Transportation Commission objectives to reduce Vehicle Miles Traveled it creates substantial harms as outlined below:

Hydrology - as noted the project would add to emission runoff after settlement into the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) (Region 2), an area already impacted with NPDES runoff. However the proposed mitigation (page 2-8) is completely inadequate. It fails to take into account the history of the pollutants from the existing project.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Hwy 101 and how it has built up over the generations as the road has expanded. Minimizing impacts is not sufficient when the water body is out of compliance with health standards. The area in question is already adjacent to the bay in many regions and "scheduled" for submersion under sea level rise. Trying to mitigate some of the runoff into the soils [page 2-9, 2-10] from additional impervious surfaces will not work unless an expensive barrier and treatment can be developed. Here too the conversion option rejected in section 1 because of a lack of systemic understanding would have a beneficial consequence by not adding impervious surfaces.

Transportation and Traffic.

The analyses from page 3-16 to 18 is severely under representative of the problems in the corridor that will be exacerbated by the selected project. Some areas to consider:
The San Mateo County Comprehensive Bicycle and Pedestrian Plan (September 2011) (SMCCBPP) shows the freeway over crossings to be a major heat spot for collisions between pedestrians and bicyclists with cars. There is no analysis of how the problem will worsen with the expanded roadway. 101 Interchanges already act as barriers by constraint how pedestrians and bicyclists can cross over. This barrier exists as a notice of dangerous conditions under section 835.1 of the CGC http://caselaw.findlaw.com/ca-codes/gov/835-835.4.html because travelers lack a safe access alternative https://caselaw.findlaw.com/ca-supreme-court/1190462.html Safe access should be considered under both state law and Caltrans policy. The SMCCBPP says that "All bikeways, major intersections, and interchanges included within the Countywide Bikeway Network should be designed to provide for safe and convenient bicycle travel in accordance with Caltrans Deputy Directive 64-R-1 for routine accommodations and the Complete Streets Act (AB 1358)" page 53. Deputy Directive 64-R-1 has since been updated to DD-64-R-2. Also on page 53 is the list of Interchanges that should have been addressed and mitigated in this rDEIR and weren’t.

CEQA

Biological Resources

The proposed projects spans the length of the county. In the process it affects many culverts and bridges for the streams that come down from the hillsides to the west. 101 acts as a barrier to the movement of species from the bay side and from the hill side. Coyote, mountain lions, and other species including the monarch butterfly and the northern spotted owl migrating down from San Francisco or up from the Santa Cruz mountains are unable to use the creek corridors safely because of the width restrictions and built environment where the streams traverse 101. Increasing the width of 101 increases the danger to endangered and threatened species especially where the freeway borders the bay.

Motor vehicles are California’s largest single source of greenhouse gases (GHG), and the only category experiencing increases in GHG emissions (California Air Resources Board 7/11/2018). The Air Resources Board has identified the need to stop and reverse the trend of steadily increasing VMT. Its Final Scoping Plan calls for a reduction in annual Vehicle Miles Travelled (VMT) by 7% by 2030 and 15% by 2050 beyond current plans (page 101). This would have the concomitant benefit of reducing traffic congestion, pollution, and health impacts which are strongly correlated with VMT.

Even though transportation is California’s Climate Challenge Number One, this rDEIR refused to replace VMT-increasing programs like highway expansion (https://ncst.ucdavis.edu/wp-content/uploads/2017/03/State-Level-VMT-Strategies-White-Paper_FINAL-03-2017.pdf page iii) with climate-protective programs. In Plan Bay Area, MTC says that current plans in San Mateo will increase VMT by 16% by 2040 (Table 2.1-20). This is heading in completely the wrong policy direction.

Green House Gases (GHG)- The project would increase GHG when it is supposed to decrease them by 7% according to the California Air Resources Board (CARB) by decreasing Vehicle Miles Travelled. This is a significant impact to the environment that affects quality of life, health, and the natural environment such as biological resources by changing the state of water. The analysis of less than significant impact on page 3-8 does not take into account the feasible measures that could have been incorporated to meet the CARB target such as pricing the entire freeway and working with cities and the legislature to relocate jobs and price parking.
With regard to the analysis of alternatives, the No Build Alternative, Alternative 2, Alternative 3, and the Build Alternative were all evaluated with the same start and end points. While Plan Bay Area 2040 plans for a network of express lanes in the Bay Area, the proposed project evaluated only the possibility of creating managed lanes from approximately San Antonio Road in Palo Alto to approximately I-380 in South San Francisco. The Build Alternative would add a lane in each direction beginning at Whipple Avenue in Redwood City and continuing north to I-380 to connect to the existing HOV lanes that extend from Santa Clara County and end at Whipple Avenue. This would provide a continuous managed lane (also referred to as HOT 3+) from Santa Clara County all the way to I-380. Please also see the response to Comment R77-1 for a discussion of the project’s endpoints.

In the southern portion of the project area, sufficient width is not available to add a lane without substantial impacts to frontage roads including East Bayshore Road, West Bayshore Road, Pierce Road, Van Buren Road, and Rolison Road.

The proposed US 101 Managed Lanes Project would not preclude the commenters’ suggestion about converting a bus lane or prioritizing buses on State Route 82/El Camino Real in the future, but that would be a separate project. That route is a local arterial, subject to frequent stop lights, and serves different purposes than an access controlled freeway. The purposes of the proposed project are limited to US 101 and proposing changes to SR 82 is beyond the scope of the project. Please see the response to Comment 6-2 for a discussion of the reasons for the elimination of Alternative 3. Please see the response to Comment 6-4 for discussion of impacts on parallel routes.
R79-2

Please see the response to Comment 6-4 for a discussion of the effect of the proposed project on routes that parallel US 101.

R79-3

Please see the response to R78-1 regarding the purpose of the proposed project and proposed changes to routes parallel to US 101.

R79-4

The comment asserts that the proposed project would impact the water quality of the San Francisco Bay because it would add a lane to the freeway from Whipple Avenue to approximately I-380. Section 2.2.2.3 notes that construction of the proposed project has the potential to temporarily impact water quality if it were constructed without adhering to legal requirements designed to protect water quality, such as the requirements of the Construction General Permit and Caltrans existing MS4 permit. Taking into account the project’s necessary compliance with permit requirements and adherence to the conditions, there will be only minimal, less-than-significant construction-related impacts to water quality. No mitigation is required or proposed for the Build Alternative.

The comment also questions the impact to water quality of adding additional impervious surfaces in the project area. As noted in Section 2.2.2.3, the proposed project would add 29 acres of impervious surface. The proposed project includes several best management practices (BMPs) described in Section 2.2.2.4 that result in a low potential for untreated runoff to contribute to the volume and intensity of runoff from US 101.

As noted in Chapter 3, the proposed project would have a less than significant impact to existing and future water quality. This conclusion was reached based on the technical studies for the proposed project (Water Quality Study and Storm Water Data Report) which evaluated the existing water quality in the proposed project area, taking into account the history of pollutants from all sources, including US 101.

R79-5

This analysis in the Recirculated Partial Draft EIR/EA describes the CEQA determination and reasoning for that determination. In addition, Section 2.1.8 provides a description of the regulatory framework, existing conditions, and environmental consequences of the Build and No Build Alternatives to Traffic and Transportation as well as Pedestrian and Bicycle Facilities. The Build Alternative no longer proposes changes to any US 101 overcrossings and is not anticipated to affect pedestrians or cyclists.

R79-6

Section 2.3.1.3 explains that the Build Alternative has been designed to avoid the need for replacement of bridges or culvert extensions. Therefore, it would not affect culverts or bridges.

The Natural Environment Study-Minimal Impact and USFWS Biological Assessment were both technical studies prepared for the proposed project. Section 2.3 presents the analysis from these technical studies and evaluated the Build Alternative’s potential to impact natural communities,
wetlands, species not protected under the State or federal Endangered Species Act, and species protected by the State or federal Endangered Species Act. Section 2.3.1.3 notes that the biological study area (an area larger than the project footprint) consists primarily of hardscape or ruderal cover and is unlikely to provide habitat for vertebrate wildlife species. The Build Alternative would not have an impact on wildlife movement.

Section 2.3.4.3 explains that the Build Alternative would either have ‘no effect’ on or ‘may affect, not likely to adversely affect’ federal or State threatened or endangered species.

R79-7

The commenter’s opinions are noted.

As calculated from Table 3.1-2, annual CO₂ emissions would be approximately 1 percent higher with the Build Alternative in 2040 than with the No Build Alternative, but both would be lower than the existing annual CO₂ emissions. Therefore, the proposed project would not result in a significant increase in GHG emissions and would have a less-than-significant impact on the environment. The conclusions for the CEQA checklist items for Greenhouse Gas Emissions are based solely on the proposed project. Because the project would not have a significant impact on GHG emissions, Caltrans is not required by CEQA to implement mitigation. However, Section 3.1 describes project-level GHG reductions strategies that are part of the proposed project including intelligent transportation system features, air pollution control requirements, a transportation management plan, and energy efficient lighting.

Please see the response to Comment 21-21 for a discussion of tolling the entire freeway and the responses to Comments 6-4, 16-2, and 16-7 regarding VMT from the proposed project.

R79-8

Please see the response to Comment 6-4 for more information on how the proposed project would increase person throughput and encourage carpooling. Please also see the response to Comment 16-7 regarding VMT from the proposed project.

R79-9

Please see the response to Comment R79-7 regarding GHG emissions for the proposed project.

Please see the responses to Comments 6-4, 16-2, and 16-7 regarding VMT from the proposed project.

R79-10

Please see the response to Comment 6-2 regarding the elimination of alternatives considered and response to Comments 6-4, 16-2, and 16-7 regarding VMT for the proposed project.

In order to evaluate and disclose the potential for the proposed project to affect the environment, a Draft EIR/EA and a Recirculated Partial Draft EIR/EA have both been circulated for public review and input on the proposed project. Both documents were made available for public review on-line as well as at multiple locations throughout San Mateo County. Also, a scoping meeting (in the City of San Mateo) to obtain early input on the proposed project, and then three public meetings were held (one in Redwood City, one in the City of San Mateo, and one in
Millbrae) to allow the public an opportunity to review and comment on the Draft EIR/EA for the proposed project.

Section 2.1.9.2 explains that US 101 in the project area is not designated as a State scenic highway. Section 3.1 explains that the proposed project would not conflict with SB 375 or SB 32.
Comment Letter R80: Christopher Lepe, TransForm

From: Chris Lepe <clepe@transfromca.org>
Sent: Thursday, August 09, 2018 5:12 PM
To: SM 101 DEIR EA Comments@DOT
Cc: Stuart
Subject: TransForm Comments on Hwy 101 MLP FEIR
Attachments: Hwy 101 MLP FEIR Comments_August_2018.pdf

Dear Ms. Rivas,

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

Best,
Chris

--

Why does TransForm’s work matter? Check out our two-minute video to find out.

Chris Lepe, Senior Community Planner, Silicon Valley
TransForm
48 South 7th Street, Suite #203, San Jose, CA 95112
(408) 406-8074
Sign up for our emails at www.TransFormCA.org
Follow us on Facebook, Twitter, and LinkedIn, too.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

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

August 9, 2018
Dear Ms. Rivas,

Please accept the following comments on behalf of TransForm regarding the Final Environmental Impact Report (FEIR) 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.

Since rebounding from the economic recession, the Bay Area and Silicon Valley’s rapid employment growth has fueled escalating traffic congestion and rising housing and transportation costs to residents and commuters, impacting the region’s quality of life. Inequality continues to grow with the hollowing of the middle class, and as fires burn across the state; we continue to add more carbon pollutants from tailpipes to the atmosphere day by day, year after year. Mounting evidence indicates that we can’t build our way out of congestion by just adding more lanes because widening encourages more driving, more congestion, and more pollution.

It is in this context that TransForm views the Highway 101 Managed Lanes Project. If we are going to invest hundreds of millions of dollars on a transportation solution for Highway 101, TransForm believes it should be done in a way that maximizes mobility, equity, and climate protection benefits. TransForm’s approach is to first focus on optimizing the use of our existing highway by converting an existing lane to a managed lane and then leveraging public and private transportation options and demand management strategies. This approach would be paired with an equity strategy to maximize benefits for low income and transit dependent commuters.

The FEIR for the HWY 101 MLP considers a range of alternatives for the highway, including a scenario that widens the highway with a new managed lane (Alternative 4), and a scenario that converts a general purpose lane in each direction to an express lane and incorporates express bus services (Alternative 3). The report provides the following rationale for not selecting Alternative 3 as the preferred alternative - known as the Build Alternative:

1. The proposed express lane operations would have inadequate capacity to move in and out of the general purpose lane due to the lane reduction and increased congestion.
2. Also as a result of less vehicle capacity on the highway, some of the existing and future traffic growth in San Mateo County would be shifted to parallel routes.
3. State and Federal legislation would prohibit converting an existing non-tolled general purpose lane to an express lane.¹

In defense of the conversion approach and in order to convey the need to change the way that Caltrans and other transportation agencies plan for highway projects in the future, TransForm would like to point out several factors and assumptions that made Alternative 3 look worse:

1. Assumptions in the FEIR

   a. For the managed lanes to work well, under any alternative, it will be critical to continue the lanes on I-101/280 to downtown San Francisco. Reaching San Francisco is especially important for expanding use of the express buses that were included in Alternative 3. Unfortunately, Caltrans staff said the San Francisco County Transportation Authority’s (SFCTA) process had not advanced quickly enough to include it.

   b. Ideally there would have been a true multi-modal study, much like the recently completed Dumbarton Corridor study. The Dumbarton Study did recommend a conversion of general purpose lanes to managed lanes, along with rail, express bus, and bicycle and pedestrian improvements.

2. Modeling limitations in the FEIR

   a. TransForm had proposed a significant Transportation Demand Management (TDM) component, beyond just express buses; however, due to the inability to model many TDM strategies, TDM was not included in the analysis.

3. Design changes to Alternative 3

   a. TransForm had expected that the existing highway configuration would be used in Alternative 3, which would primarily entail restriping the existing general purpose lane and adding median electrical infrastructure and signage. Instead, Alternative 3 was designed in a way to make it widening-ready, slightly shifting the existing centerline along much of the corridor, often by just one or two feet, to allow it to best fit in the existing highway footprint if lanes were to be added in the future.

   b. While there is good rationale for having the Alternative 3 be widening-ready -- if conversion was deemed inadequate in the future, it wouldn’t require the agencies to rip up the median with all its electrical infrastructure in order to move the centerline to accommodate the new lanes -- it is important to note that the alternative could have been done more quickly and less expensively if using the existing highway configuration. One of the biggest benefits of conversion as an overall concept is the ability to do it more quickly and inexpensively, and much of that was lost with the new design.

4. Legislative approval to convert a GP lane

   a. Although it is cited as a reason for not pursuing conversion in San Mateo County on Hwy 101, there is growing interest and acceptance among other agencies:

      i. On the Eisenhower expressway in Chicago a lane conversion received FHWA approval in June 2017 for a managed lane project of which a majority of the new managed lane comes from a non-tolled general purpose

¹ Appendix D - Alternatives Screening Memorandum, pg. 31
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

US 101 Managed Lanes Project I-218 October 2018

lane conversion.  

ii. Closer to home, a recent SamTrans study issued a draft recommendation to do a conversion on the Dumbarton Bridge (which would feed into the 101 express lanes), though it still requires other approvals.  

iii. San Francisco is also now considering converting one general purpose lane in each direction to express lanes, on parts of 101 and then 280 (into downtown).

iv. Finally, MTC studied the 101 lane conversion alternative in 2015 and found it would be an effective approach. We believe lane conversion, if done at the regional scale to fill in the gaps of the proposed express network could play a critical role in moving more people with less traffic. TransForm is proposing a regional lane conversion plus optimization approach for expanding the managed lane network as part of the Horizon Initiative and we hope for its inclusion in the 2021 Regional Transportation Plan.

With Alternative 3 performing so poorly in part because of these factors, Alternative 4 (HOT 3+ with lane addition) was selected as the "Build Alternative".

Before we point our concerns with the Build Alternative, it’s important to affirm what the project does accomplish - the FEIR projections show that project creates tremendous time-savings for transit, carpoolers, and solo drivers who will pay to enter the managed lanes compared to existing conditions and compared to the No Project Alternative. There is also substantial reduction in delay for those traveling in the general purpose lanes in the segments where the highway goes from four lanes to five, e.g., northbound past Whipple and Southbound past I-380. The FEIR also points to a 10-20% increase in person throughput along the corridor and double digit increases in carpooling compared to the No Project Alternative. Finally, some negative impacts typically associated with highway widening (such as property acquisition and eminent domain) are avoided on account of careful design by project planners, which promises to speed project delivery.

Our DEIR comment letter in January 2018 provides a summary of the shortcomings of the Build Alternative for the project. Despite significant revisions since the DEIR, the shortcomings of Alternative 4 were still not adequately conveyed in the FEIR. In our opinion, this misses an important opportunity to disclose the true impacts and limitations of the project to the public. In particular, the fact sheets and summaries focus on the positive data points, while downplaying or obfuscating some of the tremendous increase in congestion that is still anticipated with the Build Alternative. This is important because, given expected employment and population growth between now and 2040, we need a much greater emphasis on reducing demand and increasing person throughput along the Highway 101 corridor than the Build Alternative alone provides. The assessment below, much of which we provided in our DEIR comment letter, still holds true with
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

the FEIR:

1. **Huge delays compared to existing and 2020 conditions:** While significant time savings accrue to those traveling in the managed lanes, delays and total vehicle travel skyrocket in the general purpose lanes over time compared to existing conditions, with or without the Build Alternative. As pointed out in our DEIR comment letter, overall daily travel time on the corridor will jump by two and a half times for the Build Alternative by 2040 compared to 2013 from 59,000 hours to 149,700 hours. With no project it would be somewhat higher at 158,376 daily hours in 2040. Although existing condition data was removed from the FEIR, the same trend is true when observing the difference between the 2020 and 2040 data provided. In summary, general purpose lane travel times degrade significantly over time under all alternatives, which for TransForm raises two questions: why are we spending $500 million on a project that won’t address congestion and what can we do to improve the performance of the project?

2. **Major backups at pinch points:** While the Build Alternative creates significant time savings in areas where the lanes transition from five to four lanes, the inverse is true in segments where the lanes transition from five to four lanes, resulting in terrible back-ups in some areas compared to the no-build. The most alarming projection in the FEIR is southbound at 5:30 pm in the five miles between SR 92 and Whipple Ave. Travel times in general purpose lanes will increase from five minutes in 2013 to 16 minutes in 2040 under the No-Build Alternative, but if the Build Alternative is implemented it will take an astonishing 89 minutes, or five and a half times the 2040 No-Build Alternative.

3. **Missed opportunity to reduce VMT and GHG’s:** The project fails to significantly reduce overall Vehicle Miles of Travel (VMT) as well as Greenhouse Gas Emissions (GHG’s). The EIR discloses that compared to No Build, the Build Alternative would see a growth of 1.2% in VMT expected by 2020 and 1% by 2040, but what is not conveyed, until looking more closely at the data, is that there will be significant growth in VMT by 2040 compared to 2013 — either 27 or 28%, with the No Build or the Build Alternative. The DEIR does predict a very slight drop in climate emissions by 2040 compared to 2013 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 alternative in the assessment truly advances our regional or state VMT and climate reduction goals.

In summary, with or without the Build Alternative, traffic along the corridor is projected to get much worse, and the project fails to make substantial progress in reducing VMT and GHG’s. So what will it take to make Highway 101 work in the near and long term? As conveyed in our DEIR comment letter, TransForm recommends the following steps to ensure that managed lanes maximize benefits for mobility, climate protection, and social equity:

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
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

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.

a. Since our DEIR comment letter, we are very pleased to have co-developed a partnership with Caltrans, SamTrans, C/CAC, VTA, SFCTA, and the MTC to initiate a MAP for Highway 101 between San Jose and San Francisco, with the first phase of the MAP commencing this month. We expect the MAP will be a game changer once completed and funded, ensuring that whatever alternative is ultimately built will move more people of all incomes with fewer cars.

b. We are also thrilled that Transportation Demand Management (TDM) and express bus services were included as eligible expenses in the recently adopted Investment Plan for the SamTrans half cent sales tax ballot measure that will be on this November’s ballot. We are also pleased that the adopted core principles in the measure emphasize the reduction of VMT and GHG and the prioritization of high occupancy modes over drive alone, which will favor the kind of demand management and person throughput strategies needed to make the managed lanes on 101 more effective, more sustainable, and more equitable.

c. Finally, the State awarded significant funding earlier this year to the managed lanes project and the express buses that will serve the corridor, making both the managed lanes and express bus services serving the corridor closer to a reality.

2 Still to be developed is an Equity Strategy to maximize the benefits of the managed lanes for people with lower incomes. The Equity Strategy could assess and recommend not only the expansion of affordable new transportation choices for low-income communities, but also the reduction of 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, equity, and climate protection of the Highway 101 Managed Lanes Project, TransForm proposes that a “101 Mobility Action Plan” and an “Equity Strategy” be created and implemented to compliment the goals of the HWY 101 MLP. We are pleased on the progress to date on moving forward the MAP and look forward to working with partner agencies on realizing the full potential for Highway 101 for as many people as possible. Finally, we hope the HWY 101 MLP provides valuable lessons learned on how to improve planning to ensure optimal outcomes for other managed lanes projects across the region and the state.

Sincerely,

Christopher Lepe
Senior Community Planner
Response to Comment Letter R80: Christopher Lepe, TransForm

R80-1

This alternative was studied as Alternative 3, which would convert an existing general purpose lane to express use, changing the through lanes on the freeway between Whipple Avenue and I-380 from four general purpose lanes to one express lane and three general purpose lanes in each direction. Please see the response to Comment 6-2 regarding the elimination of Alternative 3 from further consideration.

R80-2

The proposed project, from San Antonio Road in Palo Alto, Santa Clara County to north of I-380 in South San Francisco, San Mateo County would provide approximately 22 miles of managed lanes. These project limits are of sufficient length to work as an individual project without any other widening, and this is discussed in Section 1.3.3 (Independent Utility). Adding additional managed lanes north of the proposed project, into San Francisco could provide additional distance that would benefit City/County of San Francisco commuters using US 101 as noted in this comment. However, this would be a separate project and as noted in this comment, this concept is being further evaluated by SFCTA. The proposed project would not preclude or prevent extending managed lanes north of I-380, but this is not a necessary element in order to meet the purpose and need of the proposed project.

R80-3

Please refer to the response to Comment 36-1 regarding consideration of rail service within the US 101 corridor. Providing rail service includes significant constraints, such as the lack of right-of-way for rail, conflicts with overcrossing structures and interchanges, and provision for access to stations.

Express bus service would be compatible with the proposed project, as the buses would benefit by using the faster express lanes in comparison to the No Build Alternative where no HOV lanes are available north of Whipple Avenue.

Bicycles and pedestrians are not permitted on the freeway, but the proposed project would not preclude improvements to such facilities. Bicycle and pedestrian facilities would be the responsibility of local cities and the County outside of the freeway.

R80-4

“Road pricing” or tolling is a Transportation Demand Management (TDM) component. The proposed project would involve congestion pricing, or variable toll pricing. When the express lanes become congested, the toll price would increase to restrict the number of SOVs in the lane, or the overhead signs would change to read "HOV ONLY." The express lane would prioritize HOVs and buses first. The express lanes would give SOVs the lowest priority. The revenues collected from the proposed express lane would first be used to fund operations and maintenance of the project facility, however, the remaining funds would be available for alternatives to driving, which may include additional transit operations. This would result in improved person throughput within the project corridor, and transit would experience more reliable travel times by using the express lanes.
Alternative 3 was designed to convert one of the existing general purpose lanes into an express lane. No widening was included, nor was there any shift in the centerline. There was no design planning for adding a lane in the future (as suggested in this comment).

The reasons for eliminating Alternative 3 from further consideration are described in Section 1.4.6.3 and are also discussed further in the response to Comment 6-2.

Section 1.4.6.3 discusses the legislative requirements that apply to conversion of an existing general purpose lane to an express lane. The reasons for eliminating Alternative 3 from further consideration are described in Section 1.4.6.3 and are also discussed further in the response to Comment 6-2.

The commenter’s opinion is noted. A regional change in existing general purpose lanes to express lane use would still require individual evaluation of need, purpose, and benefits for each conversion. Lane conversion from general purpose to express lanes would also have to be consistent with legislative requirements, as explained in the Final EIR/EA in Section 1.4.5.3.

This comment actually addresses the contents of the Recirculated Partial Draft EIR/EA issued in July 2018. Nevertheless, selected sections of the Draft EIR/EA that had been updated were recirculated for public and agency review. The Final EIR/EA had not been issued when these comments were made. The existing conditions discussion remains in the Final EIR/EA, and has not been removed.

This comment is addressed in the response to Comments 11-1, 19-1, and 20-3.

Please refer to the responses to Comment 11-2.

Please refer to the responses to Comments 11-3 and 11-4

The commenter’s updates are noted. Please see the response to Comment 11-7.

Please see the response to Comment 11-7.

The commenter’s recommendations are noted. The mobility action plan is discussed in response to Comment 11-5, and the equity strategy is discussed in response to Comment 11-7.
Comment Letter R81: David Schonbrunn, Transportation Solutions Defense and Education Fund (TRANSDEF)

From: David Schonbrunn <David@Schonbrunn.org>
Sent: Thursday, August 09, 2018 4:38 PM
To: SM 101 DEIR EA Comments@DOT
Subject: TRANSDEF's comments on RDEIR
Attachments: SM 101 Managed Lanes RDEIR Comments.pdf

Please see attached comments.

An email indicating receipt would be much appreciated.

--David

David Schonbrunn, President
Transportation Solutions Defense and Education Fund (TRANSDEF)
P.O. Box 151439
San Rafael, CA 94915-1439

415-370-7250 cell & office

David@Schonbrunn.org
www.transdef.org
www.occupymtc.org
@occupymtc
Transportation Solutions Defense and Education Fund
P.O. Box 151439  San Rafael, CA 94915  415-331-1982

August 9, 2018
By E-Mail to:
sn101DEIR_EA_comments@dot.ca.gov

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

Re: U.S. Highway 101 Managed Lanes Project RDEIR

Dear Ms. Rivas:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental organization focused on reducing the climate impacts of transportation. In our DEIR comment letter of January 19, 2018, incorporated herein by reference, we criticized Caltrans’ blatant refusal to comply with CEQA. We reiterate those comments, and offer several new ones on the recirculated DEIR (“RDEIR”). Page citations are to the RDEIR unless otherwise noted.

Like the DEIR staff before it, the RDEIR staff has apparently received instructions from management to simply pretend TRANSDEF has not commented on the project. The RDEIR shows no signs that our comments have ever been read. Nonetheless, we have in our possession a 3/19/18 email from yourself, indicating receipt of our comments.

TRANSDEF’s Alternative

in our DEIR comments, TRANSDEF proposed a 2+ HOV Build/Convert alternative:

To surmount the problems identified in the analyses that resulted in these alternatives being rejected, TRANSDEF has created its own alternative that we request be studied in the Revised DEIR: HOV 2+ Convert a Lane Plus Add a Lane. To fully utilize the new facilities, this Alternative includes two operational elements: a well-funded express buses deployment and a strong promotional campaign encouraging smartphone-based real-time ridematching.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

The two HOV lanes will provide adequate capacity for the carpoolers identified by the travel model, as well as offer capacity for those motivated by the campaign, by the free-flow of traffic, and by its accompanying travel time advantage, to shift modes. When VTA sees the outcome of the study in the revised DEIR, it may well decide to modify its HOT lanes project to be compatible with it.

Because the travel model cannot evaluate the effectiveness of a proposed public campaign, this alternative will need an off-model adjustment that assumes that the campaign adds 5 percentage points to the carpool mode share...

The TRANSDEF Alternative overcomes all the operational negatives identified for Alternative 2: Excessive HOV demand, lower speeds and unreliable travel times. (1-5.) In addition, we are confident that appropriate modeling would demonstrate a significant reduction in VMT and GHG emissions. CEQA was designed to force unwilling agencies to study alternatives with lower impacts and higher benefits--exactly what is proposed here.

To gain the full benefits of a shift in the cultural expectations about driving, a large-scale public promotional campaign is needed. That, in turn requires a larger project scope, a Peninsula-scale HOV network. Creating change this profound simply cannot be accomplished with a one-county project. Model a continuous HOV lane throughout San Mateo, San Francisco and Santa Clara Counties. In addition, include the conversion of a mixed flow lane into HOV-2 for the entire length of I-280 in the three counties.

This alternative will test the potential for a very large mode shift to carpooling and transit. The proposed logical termini for the proposed Project can then serve as an early phase of a larger buildout. The Alternative would include the following elements: rigorous and ongoing enforcement of HOV occupancy rules, and HOV operational hours that cover all routinely congested time periods.

For purposes of studying this alternative, determine whether any laws or regulations govern conversions from mixed-flow to HOV. If any exist (and we are unaware of any), assume they have been amended to permit the conversion. Demonstrating in an EIR the potential benefits of conversion is essential before deeply held attitudes can be changed. (If any legislative actions are necessary, this project prerequisite would be identified in the Statement of Overriding Considerations as the responsibility of another agency, the Legislature.)

Greenhouse Gas Analysis

The RDEIR's understanding of operational GHG emissions on p. 3-26 is severely flawed. While an individual vehicle's emissions are represented by Figure 3.1-2, this is irrelevant. The question that hasn't been answered is "What are the cumulative impacts of moving more vehicles faster past a point?" As speeds increase, more vehicles are
moving, producing an entirely different curve. (Please note: The undersigned received an acknowledgement from the authors of this figure's cited paper.)

Citing MTC's regional plan is hardly a convincing source for environmental activists, who have consistently identified MTC as the region's chief promoter of unsustainable policies. The 2017 ARB Scoping Plan makes it clear that SB 375's per capita emissions reduction targets (cited on p. 3-27) are not adequate to meet SB 32 targets:

In its evaluation of the role of the transportation system in meeting the statewide emissions targets, CARB determined that VMT reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCs) are necessary. (Scoping Plan, p. 101, emphasis added.)

As our Sierra Club colleagues have noted, average daily speeds are entirely irrelevant. Congested periods represent an entirely different operational scenario than free-flow periods in the middle of the night. We flat-out disbelieve the model results showing that VMT increases by nearly 20%, while speeds remain stable. The emissions projection produced by this methodology is junk–worthless scientifically and as substantial evidence. The question not being answered here is: "What are the congested period speeds?" That's the only metric that matters.

With wildfires raging around the State, the time has long since passed for the kind of equivocation found in the CEQA Conclusion. It is profoundly incorrect for the DEIR to conclude:

Since the proposed project would result in a reduction in GHG emissions for the Design Year 2040 compared to Existing Year, the project would align with policies to keep the State on a trajectory for progress in reducing emissions toward 2050 reduction goals. (3-32.)

This is Absolutely Incorrect. The trajectory of an 80% reduction is so utterly different from a 7% reduction trajectory that the two are in no way comparable. If the entire globe reduced emissions at the latter rate, the icecaps would melt long before reductions ever started making progress. The project's trajectory will obviously impede the State's progress towards its SB 32 target. That is a Significant and Unavoidable Impact, requiring consideration of alternatives and feasible mitigations.

In addition, the reduction of vehicle emissions has already been accounted for in the Scoping Plan. It is double-counting by Caltrans to claim the project benefits the State's GHG emissions reduction efforts. In fact, it sets them back. It is the role of MPOs and Caltrans to reduce VMT. This project supports a very substantial increase in VMT. This project is heading in the wrong direction.
As we stated in our DEIR comments, the provision of SOV facilities in the guise of Managed Lanes will do the opposite of "increase commuters’ incentive to carpool, vanpool, or take buses." (3-32.) The projections of 35-59% increases in HOV use are unprecedented in regions like ours. What validation has been done with the model to ensure that this is a reasonable output? It is obvious to us that this is nonsense, or highly misleading. In comparing HOV use to No Build, is there any kind of meaningful comparison that can be made?

It is highly ironic that the RDEIR mentions SB 391 as requiring "the CTP to meet California’s climate change goals under AB 32." (3-36.) Caltrans senior management killed the draft CTP where staff attempted to do just that, and replaced a strong climate change direction with a status quo approach that fosters this very project.

This highway project is not consistent with Caltrans’ Strategic Management Plan. It contains no feature that will result in a lowered VMT per capita, and because the planning for it assumes a growing population that will continue to drive alone in the same proportion as now, it arguably will exacerbate the State’s ever-increasing VMT.

Conclusion
Perhaps what’s most offensive about this DEIR process is the deliberate way Caltrans is closing its eyes and ears to comments from the public, so that it can maintain Business as Usual. Public comment is the very heart of CEQA. Listening could help shift the agency in the direction of sustainable transportation, so that Caltrans can stop playing the role of dinosaur, about to be made extinct by history.

Without having studied the TRANSDEF alternative, Caltrans is unable to make the findings necessary to certify the EIR. The DEIR and RDEIR are not legally adequate when a feasible alternative that reduces environmental impacts has been proposed but was not studied.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

Response to Comment Letter R81: David Schonbrunn, Transportation Solutions Defense and Education Fund (TRANSDEF)

R81-1

The comment letter dated January 19, 2018 was received by Caltrans, and is included in the responses to comments as Comment Letter 21, comments 21-1 through 21-27 in this appendix. This current letter (Comment R81) was received on the Recirculated Partial Draft EIR/EA and was dated August 9, 2018. The first page of the Recirculated Partial Draft EIR/EA (General Information about this Document) notes that only portions of the document were reissued or recirculated, specifically changes to the proposed project to water quality, storm water runoff, and climate change. Other sections, such as traffic and transportation, were not recirculated and had not changed since the Draft EIR/EA from November 2017. This Final EIR/EA includes the responses to both TRANSDEF’s January 19, 2018 letter as well as their August 9, 2018 letter in this Appendix I.
This comment was submitted originally in January, and is addressed in the responses to Comments 21-22; please refer to those responses.

The comment states that the TRANSDEF Alternative overcomes all the operational negatives identified for Alternative 2 (excessive HOV demand, lower speeds, and unreliable travel times). The comment did not provide supporting or substantive information for these conclusions. This alternative is discussed in response to Comments 21-22 and the following responses to Comment R81.

Please see the response to Comment 21-22 for a discussion of the suggested alternative and its inability to meet the project’s purpose and need. Assessment of the suggested configuration demonstrated that VMT would increase 0.8 percent in 2020 and 2040 compared to the No Build Alternative. This is slightly lower than for the Build Alternative, which would increase VMT by 1.2 percent in 2020 and 1 percent in 2040 compared to the No Build Alternative.

GHG emissions for the suggested alternative would be slightly lower than for the Build Alternative and would be lower than the existing. However, like the Build Alternative, the suggested alternative would result in GHG emissions that are higher than the No Build Alternative.

The promotion of carpooling and HOV lanes has been long established by various Bay Area agencies, including Caltrans. HOV lanes have been added to major freeways in most Bay Area counties, along with promotion and encouragement to use the lanes. For example, MTC has an established “511.org Ridematch” regional carpool program that originally provided a phone-based contact to match riders. Ride matching has since evolved to include downloadable applications for cell phones, and a carpool to BART program. Caltrans, counties, and local cities have established carpool lots to increase opportunities to park and rideshare, and Caltrans and MTC are currently expanding the number and location of these lots. Advertising has been used to promote this program, and will continue. Additional information on ridesharing programs is provided in the response to Comment 21-7, and information has also been added to Section 3-1.

In addition, please refer to the response to Comment 50-1. San Francisco County Transportation Authority will prepare a San Francisco Freeway Corridor Management Study to evaluate the feasibility of a carpool or express lane north of I-380 to downtown San Francisco. That study will involve modeling of the traffic demand and conditions.

Change in HOV use is not being pursued on a single project, but in an entire program. HOV lanes have been expanded on a Bay Area region-wide basis over the past decades, and a regional HOV system along with park and ride facilities and enforcement will continue to encourage drivers and riders to use and gain the benefits of the HOV lanes. The proposed project, with the proposed extension of express lanes from Whipple Avenue to I-380 is one segment of this regional system that could increasingly be used by carpools and buses.
Please refer to the response to Comment R81-4 regarding the implementation of regional carpool and express lanes in the Bay Area and Peninsula area.

This comment requests study of an alternative that includes regional HOV enforcement and HOV operating hours during congested periods. The comment also questions whether any laws would prevent implementation of such an alternative. This comment is requesting a regional program of traffic management measures and regional HOV lanes, but these elements already exist or are being carried out on a regional basis. For example:

- Expansion outside of the proposed project area is being pursued north of I-380 into San Francisco (see response to Comment 50-1).
- Enforcement of HOV and express lane use is the responsibility of the CHP. The CHP receives funding for enforcement from violation tickets, the legislature, grants, and toll programs. Caltrans does not have the authority to change this or levee tolls for lane construction.
- HOV operational hours are established by region and based on traffic conditions on each specific route. In northern California, carpool hours are set for peak periods in the morning and afternoon/evening. The managed lanes are proposed to operate from 5 AM to 8 PM, as described in Section 1.4.1.2.

Conversion of a lane from general purpose to express lane use would require legislation. This is discussed in the EIR/EA in Section 1.4.6.3. A statement of overriding considerations is a finding made for an EIR when a significant environmental impact cannot be mitigated. The inability to convert an additional lane from general purpose use to express use without legislative action is not a significant environmental impact. A statement of overriding considerations is not considered necessary or required.

Please refer to the responses to Comments R87-1 and R87-2.

The Scoping Plan does not require that every project reduce VMT by 7 percent. This is a regional goal that will be met by a variety of measures, including land use, community design, transit oriented development, street design that prioritizes transit, biking and walking, and low carbon mobility choices. The proposed project would provide priority access to HOVs in the express lanes and would encourage carpooling and transit use.

Congestion period, or peak period, speeds are provided in the response to Comment 22-10.

VMT can increase while speeds remain the same if additional capacity is added to the freeway. The proposed Build Alternative adds a lane in each direction between Whipple Avenue in Redwood City and I-380 in San Bruno. These additional lane segments, and the proposed use of the existing HOV lanes south of Whipple Avenue for express lane travelers that pay a toll, utilize the lane capacity and increases the number of vehicles using the freeway. Even though speeds
may remain similar to the No Build Alternative, the additional lanes allow more throughput of vehicles and people, and therefore a higher VMT compared to the No Build Alternative.

*R81-8*

Please see the response to Comment 21-17 regarding SB 32 targets.

*R81-9*

Please refer to response to Comment R81-7 regarding higher VMT with the proposed project.

As noted in Section 3.1, the Scoping Plan (referred to in this comment), was originally adopted in 2008 and updated in November 2017, and outlines the State’s strategy and efforts to address climate change and greenhouse gas reduction targets (https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf).

The Scoping Plan considered alternative scenarios to meeting the goals, and established a “Business as Usual” baseline or reference scenario for comparative purposes. The Scoping Plan addresses all aspects of climate change objectives and policies, including reduction of GHG in the electricity sector, fuels, freight efficiency and target GHG sources. Mobile sources from the transportation sector are a significant consideration in the Plan, and include all aspects for reduction strategies including zero emission vehicles, GHG reductions for light and heavy duty vehicles, clean transit, and other sources. Reduction of VMT is one of the goals, as stated in this comment. Specifically, the Scoping Plan references potential VMT reduction strategies developed by the CARB. These include pricing policies that note pricing to be among the most impactful long-term VMT and GHG reduction strategies for the transportation sector. Specifically from the Scoping Plan:

A. Road Pricing
   - Develop additional highway express lanes under the authority of AB 194 that offer access to high-occupancy vehicle lanes to single occupant drivers willing to pay a toll, with related revenue supportive of road maintenance and improving multi-modal travel options on the corridor (page 4 of 5).

The project is consistent with the above Road Pricing strategy.

The project does not “double count” the measures in the Scoping Plan. Page 24 of the Scoping Plan notes that most of the measures in the Plan are identified as “known commitments” (marked with an “*”), meaning that they are existing programs or required by statute. Road Pricing is one of these known commitments, as are most of the Plan’s measures with the exception of the State’s Cap-and-Trade program. The Plan’s “known commitments” (including Road Pricing) show an overall reduction over time in the State’s GHG emissions, and combined with the State’s Cap-and-Trade program, achieve the State’s targeted emission levels by 2030. The project therefore implements a measure specifically identified in the Scoping Plan, and CARB

1 California Air Resources Board, Potential State Level-Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel (VMT)—for Discussion. (https://www.arb.ca.gov/cc/scopingplan/meetings/091316/Potential%20VMT%20Measures%20For%20Discussion_9.13.16.pdf)
identified how that plan meets the State’s goals by 2030 through a broad range of measures, one of which is Road Pricing.

R81-10

The substantial increase in throughput associated with HOV use is a reasonable expectation because the No Build has no incentive for HOV use (including vans and buses) as there would continue to be no HOV lanes between Whipple Avenue in Redwood City and I-380 in San Bruno. This is a substantial portion of the US 101 corridor within San Mateo County. With the proposed project, there would be express lanes within this section, with priority use by HOV’s. With congested conditions, there is a high incentive to use HOVs to reduce travel times within the corridor. Commuters that utilize bus, van, and carpools (such as through local provision of priority parking, employer-paid bus and transit service, and other measures) would also benefit when those commuters reach the freeway, if that is part of their commute. Therefore, a high level of HOV use is expected to take advantage of the proposed lanes and that use is expected to continue to increase over time.

The traffic model was calibrated, as described in the TOAR and summarized in Section 2.1.8.2 under “Traffic Operations Analysis Study Area and Methods.” Section 2.1.8.2 also summarizes the C/CAG-VTA model used for forecasting regional trips and distribution. A VISSIM micro-simulation model was used for the traffic operations analysis. The regional travel demand model was chosen for this study because it is the most recently validated model in the region with the ability to forecast HOV lane volumes. The model provided forecasted traffic conditions in the analysis corridor, considering lane configuration, population, employment, and the regional transportation network. Existing conditions are used to validate the models, using current traffic data from Caltrans’ Traffic Census database, Truck Traffic database, MTC HOV Occupancy Survey, Caltrans Performance Measurement System, and project-specific traffic volume counts. All traffic forecasts were calibrated or adjusted by comparing model growth to the base year demand volumes. In addition, existing conditions AM and PM peak period VISSIM operational model outputs were calibrated to replicate observed field condition bottlenecks and queues. The methods and tools used followed established procedures in National Cooperative Highway Research Program Bulletin 255, which outlines travel forecasting approaches for project-level planning and design and is a widely accepted method.

R81-11

The commenter’s opinion is noted. The California Transportation Plan (CTP) is a plan to meet both mobility needs as well as achieve the State’s climate goals. The proposed project provides a mobility option for travelers that does not currently exist on US 101 (the proposed express lanes that would serve qualified vehicles, prioritizing HOV’s while allowing SOV’s and other qualified vehicles when space is available). As HOV user demand in the lane increases, SOVs will be limited by price increases or even exclusion during peak periods as described in the response to Comment 16-7.

R81-12

The Caltrans Strategic Management Plan, drafted in 2015, sets a target of achieving a 15 percent reduction by 2020 or 3 percent per year of statewide per capita VMT relative to 2010 levels reported by each district. The plan does not require this to be implemented on a project-by-
project basis, but instead sets goals to meet the State goal of reducing GHG 80 percent below 1990 levels by 2050, as required by EO S-3-05 and AB 32. Per capita VMT is not able to be calculated at the project level since the freeway is open to all vehicles and is not limited to a specific number of people. Please see the response to Comment 6-4 regarding VMT with the proposed project.

The project does not plan for a population that will continue to drive alone, but instead encourages a mode shift to HOV use with the introduction of an express lane. Please see the response to Comment R81-10 regarding HOV use with the proposed project.

R81-13

Please see the response to Comment 21-22 for a discussion of the suggested alternative and its inability to meet the project’s purpose and need.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter R82: Victoria Grey, Sunnybrae Neighborhood, City of San Mateo

From: Vicki Grey <vgrey@sbcglobal.net>
Sent: Thursday, August 09, 2018 1:28 AM
To: SM 101 DEIR EA Comments@DOT
Cc: bunderwood@cityofsanmateo.org; czammit@cityofsanmateo.org; mbrau@sbcglobal.net; tmaccountant@yahoo.com; mweinrauer@gmail.com; tmaccountant@yahoo.com
Subject: Comments for Managed Lanes - San Mateo Sunnybrae Neighborhood
Attachments: Managed Lanes EIR comment period - San Mateo Sunnybrae letter 2018-08-08.docx

[See attached letter in MS Word for better formatting.]

To: Caltrans Managed Lanes Project

From: Victoria Grey, Mark Rau - Sunnybrae Neighborhood, City of San Mateo

Date: August 5, 2018

Subject: Comment submissions for Caltrans Managed Lanes Project
       Recirculated Partial Draft EIR/EA - Barrier 13 - S. Amphlett - San Mateo

We are submitting the below comments and questions about the Managed Lanes Project Environmental Impact Report (EIR) for the current comment period. Our comments pertain to the Barrier 13 Sound Wall in San Mateo. Additional comments are also being submitted by the following groups in our area: Sunnybrae Neighborhood, Arbor Rose HOA, and Central Neighborhood Association. Photos are being submitted under separate cover by Mark Rau.

We require all of these comments be entered into the project’s current comment period, even if not all of them meet Caltrans specifications for this period. This is because we were not able to submit comments in time for the first Managed Lanes comment period. Caltrans did not adequately make residents along the sound wall aware of the project.

In sum, we do not agree with EIR conclusions that Barrier 13 sound wall should remain at the same 8 foot height that it is now.

- The current 8 foot tall Barrier 13 sound wall height does not meet Caltrans minimum height standards: "An effective soundwall normally blocks the line of sight from a 5-foot-tall receptor to the 11.5-foot truck exhaust stacks on the highway."
- Caltrans had actually recommended a 14 foot wall when Barrier 13 was originally planned.
- The driving reason behind why Barrier 13 was built at its current, reduced height is now outdated. The local company which demanded City of San Mateo request a lower wall has been out of business for several years: the San Mateo Times. Its land has since been replaced with 74 units of residential housing called Arbor Rose, and which is located directly along Highway 101 and Barrier 13. The changeover alone -- from San Mateo Times commercial land to multi-unit residential housing -- should force Caltrans to reset the height basis for Barrier 13, so that it conforms with Caltrans minimum height standards.
- There is much more residential housing DIRECTLY next to Highway 101 and Barrier 13 than when the wall was originally built. In fact, residential housing far outnumbers commercial businesses along Barrier 13, including the first two blocks next to Highway 101 where the
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

sound wall is meant to provide the most protection. The non-residential property that remains along Barrier 13 is only a thin commercial strip, consisting of the first ½ block from 101, and it is otherwise backed by residential housing.

• Traffic and traffic noise has significantly increased since Barrier 13 was originally built, and it will worsen due to Managed Lanes' added lanes of fast moving traffic. Barrier 13 should be raised to 16 feet tall to adequately protect Sunnybrae neighborhood from current and future increases in traffic noise.

We also have serious concerns about assumptions made in the EIR and its sound study. We have been waiting for answers from Nidal Tugan - Caltrans Project Manager on our e-mail sent on March 22, 2018. For reference, please find below this letter a list of the questions sent specifically by Sunnybrae neighborhood. Other questions have been submitted by San Mateo Central and Arbor Rose neighborhood associations.

Of topmost concern from our neighborhood's question list:

- We want more details about the cost/benefit calculations used in the noise study for Barrier 13. This is because we are unable to replicate the math using the information shared publicly in the noise study and EIR.
- We are concerned the Caltrans map for Barrier 13 may not properly account for the current 8 foot sound wall height along the Arbor Rose development as it should be (see items #5-6 below).
- We are upset that the S45 noise receptor was placed behind the tallest commercial building along South Amphlett Street, and therefore was not a representative location to gather true noise readings for the area (see item #4 below).

Again, please review the below list of comments and questions that we are submitting in addition to this letter, and submit all of this information to the current Managed Lanes comment period. We look forward to working with Caltrans to discuss and correct conclusions made in the EIR about Barrier 13 sound wall height, so that our neighborhood can get adequate noise protection from Highway 101 and Managed Lanes.

Regards,
Victoria Grey
Mark Rau
Sunnybrae Neighborhood in San Mateo
APPENDIX -

In addition to the above letter, below is the list of questions/comments about the EIR and Caltrans noise study that we are submitting for the Managed Lanes Project comment record, and which request should be responded to and addressed:

1) Please clarify: is the Barrier 13 study based on the total sound wall length along Amphlett (from 4th Avenue going south, all the way to where it ends before Hwy 92), or just the 8 foot tall portion of the sound wall? And are the quoted construction costs for the same distance as the studied section? There are residents on 16th Avenue who have asked how far south this wall will go.
2) We would like to see the actual math used for the Barrier 13 cost benefit calculation. There is not enough information in the publicly shared reports for us to replicate your cost benefit results on our own. For instance, to meet Caltrans break even cost requirement, we would have needed 29
"benefitted" receptors for our "total reasonable monetary allowance" to essentially cover the $2.6M construction cost for a 12-16 foot wall (29 * $92K). Yet the noise study only lists a few receptor locations.

3) How many total receptors in total were placed and/or modeled, and which 20 "benefitted" versus which ones didn't meet the standard? (Please provide address locations and number of feet distance from Hwy 101) Based on the calculated results shown for Barrier 13, doesn't it make sense to expect that at least 29 should have been placed along Barrier 13 to make the measurement exercise worthwhile?

4) From what we can tell, we are concerned about the low number of receptors listed in the sound study along the 8" portion of Barrier 13 wall for the sound study AND WHERE they were placed. At best, it appears there were 2-3 receptors: S42 on 7th, S45 in a backyard on Humboldt, and possibly M46 in front of Arbor Rose (if M46 was considered a barrier 13 receptor at all, per #5 below). Of particular concern is S45. It was placed behind the huge Peninsula Beauty warehouse which explains why the sound readings were so low. Meantime, even S42 on 7th appeared to be in partially protected areas. Why were there so few receptors used to make a decision about the Barrier 13 sound wall? And why the strange placement of them? The Peninsula Beauty building is the largest building along the Barrier 13 stretch and so NOT representative of other commercial buildings which are generally one story tall. It's also worth noting that commercial properties no longer line the whole stretch of Barrier 13 and are only ½ block deep backed by homes, with the rest of the area being dense residential housing.

5) We are concerned that the Arbor Rose housing development is not being properly considered in Caltrans decision about Barrier 13 wall height. Arbor Rose residential development replaced the former San Mateo Times building at 1080 S. Amphlett. This new residential development includes 74 homes. On Page 5, the new Arbor Rose Homes were left off the list of impacted developments in San Mateo. We need to include this new development in your list. Caltrans needs to include a REAL receptor at the Arbor Rose residential development between the new fence and their building where the current wall is only 8 feet.

6) There is a possible ERROR in appendix C of Caltrans EIR that could impact evaluation of the barrier 13 sound wall. It appears to show the south side of the 8' portion ending at 10th and Amphlett. In reality, the sound wall ends the equivalent of two residential blocks south of that at Sunnybrae Blvd. See below screenshot of their map and my photo showing where the 8' span truly ends.
   - The concern is that the M46 receptor placed in that area had very high noise results and may not be properly counted as part of the barrier 13 sound wall noise cost/benefit analysis.
   Can you verify this is an error in Caltrans report? If so, will this change the cost benefit calculation for assessment of Barrier 13 sound wall height?
   [see next page for exhibits]

7) Will you please provide more methodology details about the "noise level without barrier" reported for Barrier 13 (67 dB)? Was that a loudest hour measurement? What hour was that? And was it a loudest measurement across all measured days and receptors or some kind of average (in which case, what is the methodology for the average calculation)?

8) Why does it appear that most of the sound measurements were done in the middle of the day instead of closer to and hour before/after rush hour when sound would be loudest (with most cars but traffic still moving).

9) Why does the report quote the same estimated construction cost for 12, 14, and 16 foot walls?

10) What will the replacement cost be for replacing our current wall in comparison?
   - Note: we don't have that information since the report estimates same estimated cost for 12-16 foot walls.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Note: This commenter also submitted an email correspondence to other commenters. This email is not a comment on the Recirculated Partial Draft EIR/EA and therefore is not included; however, it is part of the administrative record for the project and is available upon request.

Response to Comment Letter R82: Victoria Grey, Sunnybrae Neighborhood, City of San Mateo

R82-I

Please see the response to Comment 3-1 regarding changes to the Build Alternative in the Final EIR/EA.

The following provides additional information regarding noise predicted to result from the Build Alternative and any noise abatement required under 23 CFR 772. New or replacement sound walls within the State right-of-way are typically constructed to meet the criteria in Chapter 1100 of the Highway Design Manual.

According to Section 2.2.7.3 of the Final EIR/EA Barrier 13 is located along South Amphlett Boulevard in San Mateo. Two receptor IDs are located behind Barrier 13 – S42 and S45. Table 2.2.7-4 indicates the existing noise level at Receptor ID S42 is 62 Leq[h] dBA and 55 at Receptor ID S45. The existing noise level was measured in the fall of 2016, and therefore, takes into account the change in land use that occurred prior to the noise measurements.

The proposed project is anticipated to increase noise by 5 Leq[h] dBA at Receptor ID S42 and 1 Leq[h] dBA at Receptor ID S45, assuming the existing sound wall is removed. With the proposed project, Receptor ID S42 would meet the noise abatement criteria of 67 Leq[h] dBA. Since this location would meet the noise abatement criteria level, it was considered for noise abatement in the Draft EIR/EA.

The abatement considered was a sound wall. The location already contains an existing 8-foot sound wall, as indicated by the commenter, so noise abatement considered in this location would consist of increasing the height of the sound wall. As indicated in Table 2.2.7-6, a 12-foot tall sound wall would provide a 7 dBA reduction. This meets the Caltrans Traffic Noise Analysis Protocol (Caltrans 2011) acoustical design goal for the Receptor ID S42. Therefore, increasing the height of the sound wall is considered feasible. The commenter is correct that a 12-foot wall would generally provide visual screening for an 11.5-foot truck exhaust stack as well.
As noted in Section 2.2.7.4, in order for noise abatement to be recommended, it must meet the requirements for feasibility and reasonableness. Reasonableness is determined based on the number of benefited receptors behind Barrier 13. According to the Traffic Noise Analysis Protocol (Caltrans 2011), for Category B land uses “each residential single-family or multi-family dwelling unit must be counted as one receptor.” While the properties that directly border the freeway in this location are mainly commercial, Category B is the most representative land use category in the Traffic Noise Analysis Protocol.

The Noise Study Report prepared for the proposed project found that Receiver ID S42 represented 20 units that would have the same level of noise reduction benefit from an increase in the height of the existing sound wall. Please see the response to Comment 18-1 for a description of the required placement for noise measurement locations and counting benefited receptors.

Each of the 20 benefited receptors qualifies for an allowance of $92,000 per benefited receptor (cost considerations for determining noise abatement reasonableness are based on allowance per benefited receptor). Therefore, noise abatement would be considered reasonable by the Traffic Noise Analysis Protocol if construction costs were predicted to be $1,840,000 or less. Construction costs to increase the height of the existing Barrier 13 were predicted to cost a minimum of $4,259,186. Therefore, while noise abatement is technically feasible in this location, it was not found to be reasonable. Since Barrier 13 is no longer being relocated as part of the proposed project, it has been deleted from Table 2.2.7-6.

R82-2

Please see the response to Comment R82-1 for more details on the costs and benefited receptors associated with Barrier 13 and the evaluation of increasing the height from the existing 8 foot wall as part of noise abatement.

Please see the response to Comment R82-3 regarding the Arbor Rose development.

Receptor ID S45 was placed in a representative rear yard and is consistent with the Caltrans Traffic Noise Analysis Protocol. Please see the response to Comment 18-1 for a description of the requirements for noise measurement locations. However, a similar measurement was taken at Receptor ID S41. This location is closer to the freeway centerline than Receptor ID S45 but is not shielded by a building. This location also did not meet or exceed the NAC, and therefore would not increase the number of benefited receptors.

R82-3

The Noise Study Report prepared for the proposed project evaluated existing and proposed barriers in locations where at least one receptor would approach or exceed the NAC and was not currently shielded by a 14 foot or higher sound wall. The existing sound wall spans from the Southbound US 101 on-ramp at E 4th Avenue to just after the creek near Haddon Drive. The existing sound wall was evaluated in 3 segments, corresponding to Barriers 12, 13 and 15. Therefore the whole span of the existing wall was evaluated.

Please see the response to Comment R82-1 for more details on the costs and benefited receptors associated with Barrier 13 and the evaluation of increasing the height from the existing 8 foot wall as part of noise abatement.
Please see the response to Comment R82-1 for a description of benefited receptors and how they were counted.

The commenter notes that the Arbor Rose development is located at 1080 South Amphlett Boulevard. Receptor ID M46 corresponds to this location. The commenter is correct that this development is not behind studied Barrier 13. It is behind Barrier 12, which was studied as part of the Noise Study Report for the proposed project. According to Table 2.2.7-4, Receptor ID M46 has an existing noise level of 70 dBA, which exceeds the NAC. Therefore, Barrier 12 was considered for noise abatement in the Noise Study Report. An increase in the wall height to 16 feet for Barrier 12 was predicted to reduce noise by 5 dBA. However, increasing the height of the existing wall to 16 feet would not meet the acoustical design goal of a 7dBA reduction in noise. The Draft and Final EIR/EA only includes a discussion of the barriers found to be feasible. Since Barrier 12 was not feasible, it was not included.

The nearest long-term measurement taken to the commenter’s location was at Receptor ID L47 (shown on sheet 37 of Appendix C). A 24-hour measurement was taken at this location. The loudest hours were 5 AM, 6 AM, 10 AM, 11 AM, 12 PM, 3 PM, and 6 PM. Measurement S42 was taken from 1:00-1:10 PM and resulted in a 10-minute Leq, dBA of 64. Long-term and short-term measurements are not directly used to represent existing conditions. These measurements were used to calibrate the FHWA traffic noise model, as described in the Noise Study Report. This is required by the Caltrans Traffic Noise Analysis Protocol.

Construction costs for new and replacement barriers are described in Table 2.2.7-6 and are based on the existing conditions. The Draft EIR/EA provided estimates that have been refined and updated in the Final EIR/EA. Construction costs are based on many factors including design requirements described in Chapter 1100 of the Highway Design Manual.

Please see the response to Comment R82-1 for calculating costs and benefited receptors.
Comment Letter R83: Thomas Morgan, Arbor Rose HOA

Most common concerns for the Arbor Rose HOA:

AR 1. Managed Lanes project to bring freeway closer to our association/neighborhood. The noise is already loud the idea of it being louder is extremely frustrating. Homeowners bought homes between 2012 and 2013. The row of town homes closest to the freeway have 4 panes of glass to mitigate noise. Will the home owners need to go with thicker glass/more panes? Is Caltrans willing to pay for the replacement of windows?

AR 2. Freeway was widened to 5 lanes from 4 lanes in each direction in 2007 wall height was not increased. This is a 25% (1 new lane/ 4 existing lanes) increase compared to what existed prior to 2007. Does the increased traffic since 2007 not warrant a higher wall?

AR 3. Developer added 6 feet of dirt to raise homes to keep out of flood zone changes likely in the future. This means in most places the net height of the wall is two feet. The sound from the freeway is particular bad in trash enclosures and parking stalls next to the fence line. Please place one of the noise receptors at 11 feet height near the trash enclosures and parking stalls in the Arbor Rose residential development next to the fence line. Depending on timing please make sure receptors are not placed behind construction trailers occupying the vacant lot adjacent to our association. Is the existing wall compliant with all Federal Mandates from FEMA, anticipation for sea level rise, and FEMA 50 and 100 year flood zone maps?

AR 4. The recent 92/El Camino Caltrans put in a much more substantial sound wall in as part of the improvements there. We would expect equitable measures be taken for our neighborhood given Highway 101 handles significantly more traffic than State Route 92. How and why is our neighborhood different?

AR 5. Many of the commercial properties along Amphlett have change hands recently. Most recently marketed was the Peninsula Beauty building (Pink building on the corner of 10th and Amphlett) more housing is probably no need to keep low. Housing is very expensive a higher wall could result in fewer mitigation measures need for new developments. San Mateo is about to embark on a General Plan Update more housing along Amphlett is probable. Should we not be proactive and build a higher wall to accommodate future growth?

AR 6. Many amenities for children have located along Amphlett Pied Piper, B at Music, dance, and martial arts businesses. Pollution from the freeway is particularly detrimental to our youth. Is the health of our youth not important?

AR 7 In Southern California it is recommended that developments should be at least 500 feet from the freeway. Many of our homes are less than 500 feet away. A higher wall could help prevent some of the particles from entering the neighborhood. http://www.latimes.com/projects/la-me-freeway-
Response to Comment Letter R83: Thomas Morgan, Arbor Rose HOA

R83-1

Please see the response to Comment 3-1 regarding changes to the Build Alternative in the Final EIR/EA.

With regard to noise at the Arbor Rose development, the response to Comment R82-3 describes existing and future noise levels with the Build Alternative and how the noise levels were calculated.

New or replacement sound walls within the State right-of-way are typically constructed to meet the criteria in Chapter 1100 of the Highway Design Manual. The Final EIR/EA includes a description of existing conditions and environmental consequences resulting from the No Build and Build Alternatives with regard to the floodplain (Section 2.2.1) and sea-level rise (Section 3.1).

R83-2

The Noise Study Report and Noise Abatement Decision Reports prepared for the proposed project, as documented in the Final EIR/EA were prepared according to Caltrans Traffic Noise Analysis Protocol. This is the same standard used for any Type 1 Caltrans project since 2011. The criterion for noise abatement is described in Section 2.2.7.4.

R83-3

While the studied barriers on South Amphlett Boulevard in San Mateo did not meet the feasibility and reasonableness criteria described in Section 2.2.7.4, this decision does not preclude residents from working with the City of San Mateo to increase the height of the sound walls in this area.

R83-4

Section 2.2.6 describes the existing air quality in the proposed project area and evaluates the projected air quality with and without the Build Alternative. The proposed project would not result in a substantial increase in MSAT pollution or in an air quality violation for criteria pollutants.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Please see the response to Comment R82-1 for calculating costs and benefited receptors.

Comment Letter R84: Laurie Watanuki and Michael Weinhauer, Central Neighborhood Association

From: lwatanuki lwatanuki6@gmail.com
Sent: Thursday, August 09, 2018 7:28 AM
To: SM 101 DEIR-EA Comments@DOT
Cc: Vicki Grey; Mark Rau; Thomas Morgan; Laura Watanuki; Michael Weinhauer; Brad Underwood Director of Public Works; Cathi Zammit
Subject: Additional Comments for the 101 Managed Lane Project - Recirculated Partial Draft EIR/EA - Barrier 13 - S. Amphlett - San Mateo
Attachments: 8-9-18 Comments-101 Managed Lanes-Recirculation of EIR.pdf

Central Neighborhood Association

August 8, 2018

Subject: Additional Comments for the 101 Managed Lane Project - Recirculated Partial Draft EIR/EA - Barrier 13 - S. Amphlett - San Mateo

This is our last window to submit our comments for the 101 Managed Lanes Project for residents in the Central Neighborhood Association, Sunnybrae Neighborhood and Arbor Rose HOA.

1. This project realigns ramps at 3rd Avenue - what does this realignment mean on the west side of this interchange? This point was on the slide presentation at the City Council / Caltrans hearing on February 20, 2018 in Room C.

2. There are high accident numbers recorded in the last 3-5 years at 3rd/Humboldt (9 accidents) and 4th/Humboldt (15 accidents). Will the realignment of ramps from this project at 3rd Avenue funnel more traffic to this highly impacted area?

3. We need more green pedestrian street lamps for pedestrian and bicyclists safety along the 3rd/4th Avenue on/off ramp on the west side of 101. While we are encouraging walking and bike usage, this area is very dark for pedestrians and bicyclists at night around the overpass.

4. Our residential neighborhood also gets tagged frequently with graffiti along the wooden fence in the open lot area near 4th Avenue, and along the south side of 4th Avenue between S. Humboldt and S. Idaho. These tagged areas include the sound wall, utility boxes, and the street signage. More green pedestrian level lighting would help.

5. The 3rd/4th Avenue Interchange creek area continues to draw the homeless population. We need to have the tall grass and weeds maintained and trash picked up regularly by Caltrans to deter the homeless from using this area for campsites. The two fallen dead trees need to be removed.

1
Table 2.2.6-3 Localized CO Concentrations at the Worst-Case Interchanges:

Page 166 of 466

- The 3rd Avenue Interchange is listed as having the highest CO (Carbon Monoxide) concentrations for 2020 and 2040 in this table. This location has the maximum estimated CO concentrations for 1 hour and 8 hour concentration of 3 intersections/interchanges and represents the highest traffic congestion in the project area.

- The 3rd/4th on-ramp also has 101 northbound and southbound AM/PM peak period congestion and bottlenecks.

- A 16 ft sound wall with vegetation will bring much needed environmental protections for residents from the highest CO concentrations and traffic congestion in this project area.

3. What are the future traffic impacts to surrounding residential streets with the 101 Managed Lanes Project? There is the movement of the wall 4-5 ft west, the movement of lanes on frontage road, possible redirection of traffic, and the realignment of 3rd Avenue.

- We will need traffic calming to reduce cut-through traffic for pedestrian safety and neighborhood preservation.

4. Residents at 516 S. Idaho Street (between 5th Avenue to 7th Avenue) have shared their experience with the freeway noise in our Central Neighborhood.

- Residents stated on weekdays, the 101 Freeway traffic noise is louder from 7 am - 11 am and 4 pm - 7:30 pm. The EIR stated the noise receptors S41, S42, S45 in our area were taken between 1 - 1:20 pm at 5 ft. levels with less traffic volume. The recording time for M46 (Arbor Rose) was not listed.

- On the weekends, the 101 traffic noise increases with heavier traffic volumes to sporting events at the AT&T Park, to San Jose, and other events at the Expo Center in San Mateo. The heavy traffic and noise impacts have expanded beyond peak hours.

- Why not take readings when there is more traffic, place the receptacles at higher levels for second story homes, and in more residential locations that are not hidden behind a 2 story masonry building (S45) or next to existing sound walls (S41) which protect the area around 1123 East 5th Avenue?

- Our current 8 ft to 12 ft sound wall on S. Amphlett is inadequate and this wall needs to be much higher for current and future impacts with more transit oriented development.

5. What are the commercial parking impacts to surrounding residential streets with potential lane movement on South Amphlett? S. Idaho between 5th and 7th Avenue is heavily impacted today by the employee parking from businesses. The 101 Managed Lanes Project may add more commercial parking impacts to other residential blocks surrounding S. Amphlett. This will need to be addressed.

6. We are waiting for the responses to the noise study questions sent to Nidal Tuqan - Caltrans Program Manager, since Caltrans is now in the Design Phase. We have been told consultants are working on the questions. Is the mid-August timeframe still the target date for our responses?

7. We would like to reschedule our meeting with the Caltrans Staff when the consultants get the answers to our questions. Will this be in mid-August?
8. We are waiting for Nidal Tuqan Caltrans Program Manager to give us the funding breakdown for the sound wall - what Federal funds and State agencies are funding this Barrier 13 sound wall?

9. What are the construction impacts to the surrounding residents with pile drivings and construction parking with the new wall?

10. We hope the construction of new sound walls will take place from the 101 Freeway side.

11. Can you build the new wall first then tear down the old sound wall so residents are protected?

12. Can you tell us if City streets will be used for the construction of the sound wall? Please use wider arterial streets for the heavy trucks being used for the construction of Barrier 13. The Arterials are designed to carry the larger, heavier loads.

13. There are concerns with the vibrations of heavy trucks if a possible construction route is placed on 5th Avenue a narrow local street with Sycamore street trees. What streets will be used for the wall construction?

14. There is a sensitive Historical Japanese Muromachi Garden at 1007 East 5th Avenue. We do not want the 7,000 gallon pond, island, and mountain infrastructure to be impacted by the heavy construction and cement trucks passing through 5th Avenue. There is also a sensitive Historical Katsura Villa Replica and Garden on S. Humboldt and 4th Avenue.

15. Please notify WAZE before the sound wall construction starts so the truck drivers do not use the local narrow streets.

16. On Page 202 of the Draft EIR, there are similar data points at M34 in North Central at N. Idaho and S42 on S. Amphlett at 7th Avenue. These are 2 residential neighborhoods on the same side of the freeway. Why are the Arbor Rose, Central and Sunnybrae Neighborhoods only getting an 8-13 ft wall and North Central is getting a 16 ft wall with similar data points? We have a 7 db noise reduction with a wall. The construction costs are the same for a 12, 14, 16 ft. wall. Can you explain the reasoning why there are differences in the wall heights when the data points are similar?

17. We have been told, Caltrans will move the current walls in to accommodate their 101 Managed Lanes Project if the utilities are not impacted. Although it is 4-5 feet, the land they are moving the wall onto is owned by the City since South Amphlett is a City street. Unless Caltrans is utilizing eminent domain to garner this land, shouldn't the City be able to write a provision of a taller wall in exchange for this land?

Thank you.

Laurie Watanuki and Michael Weinhauser
Central Neighborhood Association
San Mateo, California

Note: This commenter also submitted an email correspondence to other commenters. This email is not a comment on the Recirculated Partial Draft EIR/EA and therefore is not included; however, it is part of the administrative record for the project and is available upon request.
Response to Comment Letter R84: Laurie Watanuki and Michael Weinhauer, Central Neighborhood Association

R84-1

Due to minor widening as part of the proposed project, changes would be made to the striping and outside edge of the pavement for the on- and off-ramps on the west side of the East 3rd Avenue interchange. Specifically, the gore areas (the areas where the exit lane diverges from the mainline or where the entrance lane joins the mainline) on the on- and off-ramp would be realigned slightly. As a result of the new striping, the on- and off-ramps would be conformed for up to 100-150’ into the ramps. This minor change is not anticipated to affect traffic movement or volumes.

R84-2

Please see the response to Comment R84-1.

R84-3

The proposed project would only replace lighting that needs to be moved in order to make the ramp changes as described in the response to Comment R84-1. Please see the response to Comment R84-3 to find out how to request maintenance from Caltrans.

R84-4

This comment has been submitted to the Caltrans Division of Maintenance. All customer service requests, including graffiti, illegal encampments, landscaping, and litter, can be submitted online at the following website: https://csr.dot.ca.gov.

R84-5

Sound walls were considered for the proposed project as abatement for freeway noise, as described in Section 2.2.7. Air quality (both existing and future with and without the Build Alternative) were studied as part of the proposed project and are described in Section 2.2.6. The proposed project would not result in a substantial increase in MSAT pollution or in an air quality violation for criteria pollutants. Therefore, physical barriers to reduce air pollution were not considered for the proposed project.

R84-6

Please see the response to Comment 3-1 regarding the movement of sound walls in this area. No changes are proposed to South Amphlett Boulevard with the Build Alternative.

Please see the response to Comment R84-1 for a discussion of the realignment of the 3rd Avenue ramps.

Please see the response to Comment R78-2 for a discussion of the proposed project’s effect on local roadways.

R84-7

Please see the response to Comment R82-3 for a description of noise measurements for the commenter’s location. In addition, please see the response to Comment 18-1 for a description of the requirements for noise measurement locations.
Please see the responses to Comments R82-1 and R82-3 for a discussion of raising sound wall heights on South Amphlett Boulevard as part of the proposed project. The proposed project does not preclude raising the sound walls as part of a separate project or as a result of coordination between the City of San Mateo and Caltrans.

Please see the response to Comment 3-1.

Caltrans is committed to continuing to work with local residents regarding sound walls. Responses received on the Draft EIR/EA and Recirculated Partial Draft EIR/EA are included in the Final EIR/EA.

Please see the response to Comment 3-1 regarding the movement of sound walls in this area.

The replacement of sound walls adjacent to northbound US 101 in San Mateo have been analyzed and are described in Section 2.2.7 (Noise). The specific construction methods for replacing sound walls will be determined during final design which follows the PA&ED phase. Pile driving activities may be required for sound wall reconstruction, and were estimated at 5-20 dBA above ambient levels. These activities would be temporary until the foundations are installed, and construction of the walls after the foundations are installed would be an activity at the lower end of this estimated range. Construction of the walls would occur from the freeway side if possible, but this would ultimately depend on each site location. In general, the replacement walls would likely require removal of the existing walls first, in order to allow for site preparation and installation of a new foundation; therefore, there would be a temporary period during which the walls are absent until the new walls are installed.

Please see the response to Comment 3-1 regarding the movement of sound walls in this area.

Please see the response to Comment 3-1 regarding the movement of sound walls in this area.

As shown in Table 2.2.7-4, the existing and projected noise levels at Receptor ID M34 do not approach or exceed the NAC. Therefore, this location would not qualify for noise abatement under 23 CFR 772.

However, this Receptor ID is located behind studied Barrier 16. In the Draft EIR/EA, relocating Barrier 16 was included as part of the Build Alternative to accommodate the managed lanes. The Final EIR/EA has been updated to reflect refinements in the preliminary project design. The Build Alternative no longer includes the potential need to make any changes to southbound sound walls. Therefore, no walls are being added or replaced in this area as part of the Build Alternative.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Please see the response to Comment 3-1.

I.7 Comments from Individuals

Comment Letter R85: Issac Clerencia

From: Issac Clerencia
To: SM 101 DOT EA Comments@DOT
Subject: Comments on Recirculated Partial Draft EIR/EA for US Highway 101 Managed Lanes Project
Date: Tuesday, July 31, 2018 8:49:49 AM

Attn: Yolanda Rivas

Dear Ms Rivas,

I am a neighbor of San Jose, commuting daily to Mountain View/Sunnyvale. While I often groan at the traffic during commute hours, I don’t think this proposal is a net positive for the region.

As a tech employee, I could easily afford this tolls every day, but this seems to just encourage more Single Occupancy Vehicles on the road, and giving affluent people a way out of the traffic mess.

I would prefer a solution that works for everyone, not just the people who can afford to pay those daily tolls.

Thanks for your attention,

Issac Clerencia
isaac.clerencia@gmail.com

Response to Comment Letter R85: Issac Clerencia

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter R86: Randy Cole

From: Randy Cole <nwcole86@att.net>
Sent: Thursday, August 09, 2018 12:28 PM
To: SM 101 DEIR EA Comments@DOT
Subject: No toll lanes on highway 101 in San Mateo County

R86-1

No toll lanes on highway 101 in San Mateo County.

Thank you,

Randy Cole

Sent from my iPhone. Please excuse any typos.

Response to Comment Letter R86: Randy Cole

R86-1

The commenter’s opposition to the project is noted.
Comment Letter R87: Adam Cozzette

From: Adam Cozzette <acozzette@gmail.com>
Sent: Tuesday, August 07, 2018 9:37 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Comments on recirculated draft EIR for 101 managed lanes
Attachments: DEIRCommentsRound2.pdf

Dear Ms. Rivas,

Attached are my comments on the recirculated draft EIR. I will also paste them below just in case there is any problem with the PDF attachment.

Thank you.
Sincerely,
Adam Cozzette

I read the recirculated draft EIR with great interest. Instead of proposing any better solutions, the new draft unfortunately doubles down on the environmentally harmful widening (the “Build alternative”) and attempts to shore up the flimsy arguments defending it.

The EIR acknowledges that the Build alternative will increase VMT and GHG emissions compared to the No Build alternative. It tries to argue that this is acceptable since with either alternative, emissions will decrease compared to current conditions, as a result of “projected improvements over time in engines and fuels” (page 3-30).

This is wrong—we all have to do our part to reduce emissions, and Caltrans cannot slack off just because it expects other people (e.g. auto makers) to make progress. The 2017 California Air Resources Board Scoping Plan states that “in addition to achieving GHG reductions from cleaner fuels and vehicles, California must also reduce VMT.” That plan goes on to state specifically that by 2030 we need to reduce VMT by 7% compared to projected levels. The Build alternative goes in exactly the wrong direction—increasing VMT when in fact we need a substantial VMT reduction.

The new draft claims on page 3-34 that “the project would not conflict with transportation goals identified in the ARB Scoping plan and would be consistent with GHG reduction strategies identified in the Scoping Plan.” That is patently false, based on the Scoping Plan’s explicit statement that we need to reduce VMT compared to business-as-usual. The draft goes through a laundry list of other GHG reduction strategies that are planned or in progress in California, but those will simply not suffice if we fail to reduce VMT.

One change from the original draft is that the new one claims a decrease in CO2 emissions by 2020 (see table 3.1-2 on page 3-30). It says that with the Build Alternative, there will be 4.13 million metric tons per year of CO2 emissions in 2020, down from 4.16 million metric tons in 2015. That is only a 0.7% change, which is statistically insignificant given the uncertainties in the estimates. Those CO2 emission estimates are especially dubious given that they are based on a daily average speed, which disregards the actual variations in speed that occur throughout the day and across the corridor. A more accurate calculation could very well show that the Build alternative would increase CO2 emissions by 2020, compared to 2015 conditions, even if we assume improvements in engines and fuels.

Response to Comment Letter R87: Adam Cozzette

The ARB’s First Update to the Climate Change Scoping Plan (hereafter, Scoping Plan, as described in Section 3.1) is a high-level statewide strategy approach not intended for application
to individual projects. Figure 3.1-1 represents a business-as-usual scenario assuming none of the Scoping Plan measures are implemented.

Emissions estimated for the Build and No Build Alternatives are presented in Table 3.1-2. However, it should be noted that even the No Build Alternative does not represent the Scoping Plan’s business-as-usual scenario, because even with the No Build Alternative, the measures listed in the Scoping Plan (including roadway pricing, as described in the response to Comment R81-9 on other Bay Area roadways) have been and will continue to be implemented. As shown in Table 3.1-2, both the Build and No Build Alternatives in 2040 would result in lower annual CO₂ emissions than the existing year. Figure 3.1-1 indicates that under the business-as-usual scenario, annual transportation emissions continue to increase. Therefore, both the Build Alternative and No Build Alternatives reduce GHGs compared to the business-as-usual scenario, even while the Build Alternative would increase VMT 1.2 percent over the No Build Alternative.

**Consistency with the Scoping Plan**

The Scoping Plan indicates that reductions in VMT are to be achieved in part by implementation of the Sustainable Communities Strategy (*Plan Bay Area 2040*). The proposed project has been included in *Plan Bay Area 2040* (as described in Section 3.1).

The Scoping Plan also notes that “most of the GHG reductions from the transportation sector in this Scoping Plan will come from technologies and low carbon fuels”. In addition, the Scoping Plan notes that CARB determined that VMT reductions of 7 percent below projected VMT levels in 2030 are necessary (as noted by the comment). In their Scoping Plan, CARB recommended “that local governments consider policies to reduce VMT to help achieve these reductions, including: land use and community design that reduces VMT; transit oriented development; street design policies that prioritize transit, biking, and walking; and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities”.

The proposed project would not preclude local governments from enacting VMT-reducing policies recommended by the Scoping Plan. Please see the responses to Comments 6-4, 16-2, and 16-7 regarding the behavioral changes anticipated to result from the proposed project.

The Scoping Plan does not require that every project reduce VMT by 7 percent. The proposed project continues to support the GHG reduction strategies in the Scoping Plan, as described in Section 3.1 (such as by providing managed lanes that support increased HOV use). The increased VMT results, in part, from the additional managed lane in the freeway, which attracts users to US 101. The proposed project does not conflict with the Scoping Plan.

**R87-2**

The comment questions the validity of the annual CO₂ emissions estimates using average daily speeds, as shown in Table 3.1-2. The GHG analysis for the proposed project followed the Caltrans approved method for project-level applications for on-road GHG emissions.

Caltrans analyzes project-level GHG emissions using a travel activity-based approach that relies on speed-distributed travel activity data and gram-per-mile emission factors from EMFAC. EMFAC is CARB’s emissions model that includes its most recent mobile source emissions.
inventory. Regional analyses and the annual statewide GHG inventory use a fuel-based approach that relies on fuel sales data and the carbon content of the fuel mixtures.

For project-level analysis, the fuel-based approach has limitations in developing project-specific fleet fuel economy and reflecting variations in project travel activities (e.g., speed changes during peak and off-peak time periods). The use of the project-level travel activity-based approach captures these variations by using daily average speeds consistently across time and compares daily average speeds in 2015 to daily average speeds in 2020 and 2040. As peak period congestion increases, daily average speeds decrease. Therefore, the daily average speed reflects changes in peak period speeds and congestion.

The GHG analysis for the proposed project used the analysis method which provides for the best comparison of the existing and future conditions with both the Build and No Build Alternatives and relied upon a publicly available model that was approved by the U.S. EPA on December 14, 2015.

Comment Letter R88: Stuart Hansen (1 of 3)

From: Stuart Hansen <hansensc@att.net>
Sent: Monday, August 06, 2018 4:39 PM
To: SM 101 DEIR EA Comments@DOT
cc: dcanepe@smgov.org
Subject: 101 MLP

I agree with SM County Supervisor David Canepa that Caltrans SHOULD NOT consider adding TOLL LANES to hwy 101 as announced. This change is predicted to cost $534,000,000 of our tax payer money (Daily Post, 7/23/18) and would lock-out us commuters unless we pay even more to use the lanes we financed. Why should a few wealthy Tesla drivers be accommodated? More people can be moved if they are allowed to use fully accessible car pool lanes without yet another drain on income.

This proposal needs to be fully discussed at the county and public levels before money is committed.

Response to Comment Letter R88: Stuart Hansen (1 of 3)

R88-1

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.

Please see the response to Comment R76-2 for a discussion of public review process of the proposed project.
Comment Letter R89: Stuart Hansen (2 of 3)

Section 1.2.1 describes the existing route within the proposed project area. The southern segment from Matadero Creek in Santa Clara County to Whipple Avenue in Redwood City typically consists of one HOV lane and three general purpose lanes in each direction. The existing northbound HOV lane ends at the Whipple Avenue interchange although the southbound HOV lane begins just north of the Whipple Avenue interchange. Therefore, the project corridor currently contains one HOV lane in each direction south of Whipple Avenue, and no HOV lanes north of Whipple Avenue. There is no existing second carpool lane. The proposed project would create one managed lane in each direction that would run continuously from Matadero Creek to approximately I-380, and HOV users would receive priority use within the managed lanes. The proposed project would include signs that would change dynamically based on the flow of traffic and would allow travelers to see the current rate for driving in the managed lane as an SOV. When the lane reaches capacity, the sign would read “HOV ONLY.”

Response to Comment Letter R89: Stuart Hansen (2 of 3)

R89-1

Section 1.2.1 describes the existing route within the proposed project area. The southern segment from Matadero Creek in Santa Clara County to Whipple Avenue in Redwood City typically consists of one HOV lane and three general purpose lanes in each direction. The existing northbound HOV lane ends at the Whipple Avenue interchange although the southbound HOV lane begins just north of the Whipple Avenue interchange. Therefore, the project corridor currently contains one HOV lane in each direction south of Whipple Avenue, and no HOV lanes north of Whipple Avenue. There is no existing second carpool lane. The proposed project would create one managed lane in each direction that would run continuously from Matadero Creek to approximately I-380, and HOV users would receive priority use within the managed lanes. The proposed project would include signs that would change dynamically based on the flow of traffic and would allow travelers to see the current rate for driving in the managed lane as an SOV. When the lane reaches capacity, the sign would read “HOV ONLY.”
Comment Letter R90: Stuart Hansen (3 of 3)

From: Stuart Hansen <hansensc@att.net>
Sent: Wednesday, August 08, 2018 9:18 AM
To: SM 101 DEIR EA Comments@DOT
Cc: dcanepe@smcog.org
Subject: FW: Hwy 101 MLP Idea Clarification

Clarification of original (below) msg:

1. HOV lane #1 (left-most): Time-driven sign reads (during 6-9am/4-7pm): “HOV ONLY”. Other hrs: “OK TO USE LANE” (as used now on Xpessways).
2. HOV lane #2: Density-driven (cars/unit time) sign reads (when density = limit): “HOV ONLY”. Other times: “OK TO USE LANE”.

Stuart Hansen, Palo Alto.

Response to Comment Letter R90: Stuart Hansen (3 of 3)

R90-1

Please see the response to Comment R89-1. As a managed lane, the proposed project would operate as an HOV lane from 5 AM to 8 PM and would be restricted to HOV only during that time whenever the lane reaches capacity. Therefore, the proposed project provides a time-driven protection for HOVs and also a density-driven element during peak hours.
Comment Letter R91: Ch. Jackson

From: Calif Forns Inc. <cfalrons@pacbell.net>  
Sent: Monday, August 06, 2018 1:08 PM  
To: SM 101 DEIR EA Comments@DOT  
Subject: NO on SF Peninsula 101 Toll lanes

I am a resident of E Palo Alto. No on SF Peninsula 101 Toll Lanes!  
I think it is irresponsible give preference to those who can afford a fee to use the Toll Lane. We all pay taxes we all need to be in time at our jobs. Add Electric Vehicles to the Car Pool Lanes. So No On SF Peninsula 101 Toll Lanes. Ch. Jackson

Response to Comment Letter R91: Ch. Jackson

R91-1

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.

Comment Letter R92: Christopher Keane

From: Christopher Keane <mailto:ckeane@broderickadvisors.com>  
Sent: Friday, August 17, 2018 6:56 PM  
To: Weiss, Jeffrey A@DOT <jeffrey.weiss@dot.ca.gov>  
Subject: Re: Where is the link to provide public comment on the proposed MLP in San Mateo County? Not clear.

I am a resident of Redwood City (live along the proposed path) and am 100% against the Toll Lanes proposed.  
We should not be regressively taxing our citizens to fund a “Facebook Lane” for the rich.

Come to think of it, fail to see the logic of increasing taxes to build roads that you then tax the public more to use.

Don’t think Toll Lanes on 101 make sense on any level from everything I have read and that includes the financial feasibility figures reported.

Thank you for the opportunity to comment.

C.J. Keane  
Redwood City

Response to Comment Letter R92: Christopher Keane

R92-1

The commenter’s opposition to the proposed project is noted. Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.
Comment Letter R93: Donghui Li

From: Donghui Li <kvnil118@gmail.com>
Sent: Sunday, July 29, 2018 12:18 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Public Comment on SM 101

Dear Sir or Madam,

I strongly oppose the proposed US Highway 101 Managed Lane project for the following reasons:

1) If the true goal is to encourage carpooling, then why would the county and Caltrans consider allowing solo drivers who pay a fee to cruise the lane?

2) Charging drivers imposed another burden to residents who are already struggling with very high cost of living and who have to commute to work. I’m already paying the Dumbarton toll everyday (that toll is about to increase).

3) A better solution is to improve the carpool lane.

Regards

Donghui Li
Newark CA

Response to Comment Letter R93: Donghui Li

R93-1

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.
Comment Letter R94: Tracy Mallory

To whom it may concern,

The project is deeply flawed, and even if built does not provide the right incentives.

1) Allowing single-occupancy vehicles in HOT lanes does not reduce the number of single-occupancy vehicles, which should be one of the top goals, and in fact almost certainly increases the number of such vehicles over HOV2+, alternative 2.

2) The 45 mph lower limit is artificial and was a poor choice as THE primary purpose of the project. It does not necessarily achieve what should be the primary goal over all time scales of getting more people to their destination more quickly, not just vehicles.

3) The build alternative is the most expensive choice, paid for by all taxpayers, but benefits only small percentage of users and therefore is both unfair and unethical as it wastes our money.

4) The methodology for computing the HOV2+ over-use does not include the effect of eliminating the electric vehicle waiver, which is now simply a subsidy for those that can afford electric cars (many of the same people that could afford tolls).

5) The solution provides absolutely no incentive for two-person vehicles. That is an extremely poor choice!

Suggestions:

Preferred: Eliminate the toll system entirely, but also eliminate the electric car waiver. Then we could see the benefit of multi-vehicle use of the HOV lanes which ought to deliver the greatest number of *deserving* people to their destinations.

If we are going to build a toll system, then it should pay for itself, and the tolls should be high enough to pay off both the construction costs and operating expenses in not more than 20 years, and likely should charge private buses based on the number of passengers. But that is *not* what is being proposed.

The tolls should enable 2-occupant cars to pay a very low toll while single-occupant cars pay a MUCH higher toll, else there will no longer be any incentive for 2-occupant vehicles.

End of short response. More detailed arguments and complaints below.

I have read through all of the reasoning behind the choice of Alternative 4 vs Alternative 2, and am very certain that, as proposed, it is the WRONG CHOICE. Who decided that keeping most HOV speeds over 45mph is a REQUIRED goal? ONLY people that can afford it plus the buses operated by the same companies that employ those wealthier commuters will benefit, plus a tiny fraction of current HOV users, yet it will be paid for by EVERY taxpayer. It is therefore a regressive solution and immoral, unethical, and simply wrong. In addition, it is by far the most expensive solution. So who is benefitting the most? Not the average taxpaying commuter.

The main question that should have been asked is: "What solution gets more people to their destination more quickly?", and that question is never answered. The DOT looked only at vehicles when it's goal should have been PASSENGERS!!!
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Response to Comment Letter R94: Tracy Mallory

R94-1

As described in Section 1.4.6.2, the HOV 2+ Add a Lane Option (Alternative 2) was eliminated from future consideration due to its inability to meet the purposes of the project including encouraging carpooling and transit use, improving travel time reliability for HOVs, and applying technology and/or design features to help managed traffic. As shown in Appendix H on page ES-IX, the Build Alternative would result in 9 to 27 percent higher person throughput than Alternative 2. The Build Alternative would allow more SOVs and HOVs to use the freeway.

R94-2

The 45 mph minimum average operating speed is not one of the purposes of the project. It is required by federal regulations. As described in Section 1.3.2.4, 23 U.S. Code 166 requires that...
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

HOV or HOT lanes must maintain a minimum average operating speed of 45 mph. If this average operating speed is not met, the public authority operating the HOV or HOT lanes can increase the operating speed by increasing the occupancy requirements for HOVs, varying the toll charged to vehicles, or by limiting the lane to HOVs only.

Rather than focusing on vehicle throughput as suggested by the comment, one of the purposes of the proposed project is to increase person throughput (the number of people moved rather than the number of vehicles moved) in the US 101 corridor (see Section 1.3.1). Construction of express lanes in the corridor would provide an incentive for travelers to carpool or take buses by reducing travel time for those travel modes. The Build Alternative would result in 1 to 103 minutes of travel time savings over the No Build Alternative (as shown in Tables D-1 through D-8). As further described in Section 2.1.5.3, implementation of the proposed project would result in a time savings in the express lanes. By 2040, the proposed project would also increase the total person throughput by 15 percent in both the northbound and southbound direction in the AM peak period. In the 2040 PM peak period, there would be increases in total person throughput of 18 percent and 5 percent for the northbound and southbound directions, respectively over the No Build Alternative.

Please also refer to the response to Comment 21-7 for a further discussion on how implementation of the proposed project would increase person throughput in the corridor.

For a discussion of equity issues regarding the proposed project, please refer to the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2.

The Clean Air Vehicle (CAV) program is administered by the Department of Motor Vehicles (DMV) in partnership with the California Air Resources Board (ARB). The program authorizes a qualifying vehicle that meets specified emissions standards (including low-cost plug-in hybrids electric vehicles) to be issued a CAV decal to allow single occupancy use of HOV lanes. Assembly Bill 544, signed into law in October 2017, puts into place a new program (to begin January 1, 2019) that allows eligible SOVs into carpool lanes toll-free or for a reduced rate. However, all existing green and white CAV decals approved prior to that time will expire on January 1, 2019. Eligible vehicles must reapply for a new CAV decal in 2019. Caltrans does not have the authority to eliminate the CAV program.

The Los Angeles County Metropolitan Transportation Authority Board of Directors adopted a policy in April 2018 to begin charging a partial toll to clean air vehicles using the express lanes on I-110 and I-10 in Los Angeles County. The operator for the proposed managed lanes would determine if clean air vehicles would be required to pay a partial toll to use the express lanes.

The bay area’s express lane network is operated by individual operators. The operator for the proposed project will not be selected until the project is approved. HOVs with only 2 occupants would be able to pay a discounted toll to drive in the managed lane. This was part of the assumptions that were modeled in the TOAR and is described in Section 1.4.1.2 of the EIR/EA. Incentivizing HOVs to have a minimum of 3 occupants increases the person throughput of the lane, which is one of the purposes of the proposed project. As shown in Appendix H on page ES-
IX, the Build Alternative would result in 9 to 27 percent higher person throughput than Alternative 2 (HOV 2+ Add a Lane Alternative). The proposed project would encourage HOV use by creating an HOV/express lane on US 101 within a significant portion of San Mateo County.

R94-6

For a discussion of the CAV program and the use of decals to allow single occupancy use of HOV lanes, please refer to the response to Comment R94-11. For a discussion of equity issues regarding the proposed project, please refer to the responses to the response to Comments 11-5, 11-7, 37-1, 38-1, and 44-2.

R94-7

The comment is noted. Revenues collected from the proposed project would be used to fund operations and maintenance then alternatives to driving. Since construction costs would be incurred prior to the operation of the lanes, toll revenues would not be able to be used for construction.

The use of express or HOV lanes cannot distinguish whether the vehicles are private or public, nor can tolling equipment determine the number of passengers in a bus. Both private and public buses help reduce vehicles on the freeway.

One of the purposes of the proposed project is to increase person throughput. By 2040, the proposed project would increase the total person throughput by 15 percent in AM peak period and 5-18 percent in the PM peak period compared to the No Build Alternative.

R94-8

Please see the response to Comment R94-5.

R94-9

Please see the response to Comment R 94-2 for a discussion of the 45 mph minimum operating requirement and the proposed project’s purpose of increasing person throughput. Increased throughput is also one of the purposes of the project (see Section 1.3.1). Vehicles, such as buses, vans, and carpools carry increased passengers in comparison to SOVs, and this was calculated as throughput in the traffic modeling completed for the project. Throughput was also considered as one of the “measures of effectiveness” in the traffic study, and was estimated for each alternative. The Final EIR/EA, Appendix H, includes these results, which are summarized below for Alternative 2 versus Alternative 4 (the proposed Build Alternative), as raised in this comment. For all four peak periods, Alternative 4 would have a higher person throughput than for Alternative 2. Alternative 4 would serve more passengers than Alternative 2.

<table>
<thead>
<tr>
<th>Total Person Throughput</th>
<th>Northbound AM Peak Period</th>
<th>Northbound PM Peak Period</th>
<th>Southbound AM Peak Period</th>
<th>Southbound PM Peak Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alternative 2</td>
<td>147,277</td>
<td>155,828</td>
<td>149,560</td>
<td>157,067</td>
</tr>
<tr>
<td>Alternative 4</td>
<td>161,155</td>
<td>172,801</td>
<td>163,361</td>
<td>199,679</td>
</tr>
</tbody>
</table>
For a discussion of equity issues regarding the proposed project, please refer to the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2.

R94-10

For a discussion of equity issues regarding the proposed project, please refer to the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2.

Please see the response to Comment 21-6 for a discussion of how the Build Alternative encourages HOVs with 2 occupants.

Project benefits are not limited to the managed lanes, but also extend to the general purpose lanes. Travelers in the northbound and southbound general purpose lanes would generally experience travel time savings with the Build Alternative in both 2020 and 2040 AM and PM peaks, with the exception of the 2040 PM peak southbound commute.

R94-11

Appendix H details the travel times for the general purpose lanes and the HOV/express lanes for Alternatives 2 and 4 (Build Alternative). Figures ES-1 and ES-2 show that in all lanes, Alternative 4 would provide faster travel times than Alternative 2 with the exception of the northbound PM peak hour, where travel times would be the same as with Alternative 2. Figure ES-6 and the response to Comment 94-9 shows that person throughput is higher with Alternative 4 than with Alternative 2 in all directions.

Please see the response to Comment R94-10 for a discussion of the benefits of the proposed project to travelers in all lanes.

Please see the response to Comment 94-4 for a description of the Clean Air Vehicle (CAV) program and clean air vehicle use of the express lanes.
Comment Letter R95: Meredith Ozbil, Jazzercise Menlo Park

From: Meredith Ozbil Jazzercise Menlo Park
To: US 101 DEIR EA Comments@DOT
Subject: Re: Comments on paid carpool lanes on 101
Date: Tuesday, July 24, 2018 1:00:49 PM

Please dont

There needs to be updated mass transit in place before tolls on 101: better bus routes and times that actually link up to trains and bart. BART down the peninsula, stop huge developments that dont also have realistic mass transit plans (facebook, Stanford, apple) the Peninsula cannot continue to allow business development without equal mass housing development.

The daily work home migration from the east bay to the peninsula is awful for traffic, but past designs and decisions doesn't mean we should keep doing it.

Thanks
Meredith
Jazzercise Menlo Park
800 Middle Ave at Little House
M-T-W at 6 PM and Thurs at 5:40 pm
Saturday 9 am at Arrillaga Rec, 700 Alma
Instagram @menlojazzercise
Facebook.com/jazzercisemenlopark
Jazzercise.com

Response to Comment Letter R95: Meredith Ozbil, Jazzercise Menlo Park

R95-1

The commenter's opposition to the project is noted. Developing mass transit and determining land use in the jurisdictions along the US 101 corridor are beyond the scope of the proposed project. The proposed managed lanes would prioritize buses and carpools within the US 101 corridor, and buses are considered transit. The project would not preclude or inhibit the development or improvement of mass transit systems.
Comment Letter R96: Hal Plotkin

Dear CalTrans:

I am submitting the following comments in opposition of the current plan to install greenhouse gas creating toll lanes on 101 in San Mateo County. These comments specifically refer to the revised EIR sections on greenhouse gas emissions and the incomplete consideration of alternatives and impact on alternative modes of transportation that renders the current revised EIR seriously flawed. My comments follow (my references to HOT lanes refers to the toll lanes that have been proposed, which are known as HOT lanes in other communities):

Last month marked the 25th anniversary of the settlement of Plotkin vs. General Electric, the landmark "greenwashing" lawsuit I filed in 1993. At the time, GE was misleading consumers by selling phony lookalike energy efficient light bulbs that were in fact just old fashioned incandescent wolves in green packaging.

I took no money from the case. But I required G.E. to make labeling changes and to pony up $3.25 million dollars in consumer refunds and donations to environmental and public service groups. The labeling changes made it easier for the manufacturers of real energy efficient light bulbs, which were just then entering the marketplace, to distinguish their products on the shelves. Plotkin vs. GE also more firmly established the ability of environmental activists to turn to the courts when state and federal government agencies fail to punish greenwashing. The settlement we achieved created a powerful deterrent that continues to produce benefits to this day.

In the meantime, though, greenwashing has become a virtual industry in the political and policy worlds. Take, for example, the growing push for economically regressive and environmentally problematic HOT (high occupancy toll) lanes. HOT lanes are toll lanes on public highways. Prices are set dynamically so that HOT lanes keep moving even if all the other lanes are stuck. Governor Schwarzenegger, who originally proposed the idea, and many leading Democrats favor the idea and use it to paint themselves green. HOT lanes are also popular with many affluent motorists who love the idea of driving their SUVs in the carpool lane for what amounts to pocket change. It's an odd alliance.

Unfortunately, support for HOT lanes is also becoming a litmus test issue for some environmental groups when they evaluate political candidates, apparently without much thought about the economic consequences, particularly for the poor.

HOT lane backers push their plan by claiming that only a limited number of lanes will be involved, typically just one to start. But in Europe, where many of these experiments began, "congestion management" programs have since morphed into systems that essentially allow rich drivers to hog public roads. Give the upper crust the fast lane and, it turns out, pretty soon they want the whole road.

HOT lanes are an example of one of the worst forms of regressive taxation imaginable. Like all regressive taxes, they exact a higher percentage of income from the poor. But in this case, they also tax the very mobility of the poor, making it harder for them to commute, including to work and school, which can effectively lock people into low end jobs and poverty that they might otherwise escape.

What little thought the proponents of HOT lanes have given to their impact on the poor appears to be in the category of "let them eat cake." One widely-cited report recommending HOT lanes even dismissed concerns they were unfair to the poor by noting that service workers can use the lanes to get to their clients' houses more quickly:

R96-1
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

"... studies of Orange County’s SR-91 show that the variable-priced toll lanes are not used exclusively by the wealthy. The ability to save time and reduce uncertainty confers substantial benefits to all drivers, including service professionals who can make more service calls..."

In the San Francisco Bay Area, Caltrans and the Metropolitan Transportation Commission are fast-tracking a HOT lane implementation plan that could be devastating for students at area community colleges. At De Anza College in Cupertino, California, for example, more than 10,000 students commute to school each day. For many, this is the only reasonable path towards upward mobility. I know. Thirty years ago, I was one of those students, only to return more recently to serve on the college district’s board of trustees.

A proposed fee of $5 a day per trip on Highway 85 during peak rush hour, as envisioned, would boost a typical De Anza College commuter student’s expenses by as much as $100 a month. That burden is sure to grow over time. Escaping poverty is often a game of inches. Our surveys indicate that thousands of our students live at or near the poverty level. Each additional expense imposed by our government makes a high quality college education less accessible.

HOT lane proponents say that over the long run the impact on the poor will be positive because the tolls will be used to improve public transit, which will benefit less affluent citizens and increase use of public transportation.

But this is out of touch with the realities of life in places like Silicon Valley, where the automobile is still the most practical way for many people to get to work. What may work for investment bankers taking transit to downtown San Francisco doesn’t work for a student who lives in Mountain View and needs to get to Cupertino and then to a job in Redwood City each day.

What’s more, the promised transportation improvements may take decades to implement and may never meet the real world transit needs of working students, not to mention those who also have to stop to pick up their children, get groceries or complete errands on the same trip.

R96-2 But one thing is for sure. While we wait for those HOT lane financed transit improvements to kick in, a generation, maybe more, will find it harder to attend school or get to their jobs.

R96-3 Global warming is a very real problem. But it can and must be addressed in far better and more equitable ways. Those less regressive ideas include higher taxes on gas guzzlers, road electrification, remote sensing ("by wire") vehicles, increased subsidies and public support infrastructure for carpoles, home-based work and or possibly even a boost in industrial levies based on employee commute profiles. All of these advances will require government action and a communal effort. But each of these more significant steps are far less likely to occur if rich divers can easily get wherever they want to go quickly at the expense of everyone else.

R96-4 That’s the road the current elitist HOT lanes proposal takes us down.

It also raises the question of what comes next. Will this same crew of economic elitists also want to make public parks and beaches off limits to all but the affluent, too? After all, those are also getting pretty crowded. Or will we defend a more traditional American value: public spaces, including roads, are created, maintained, protected and improved by the public to benefit the public.

When General Electric put phony energy efficient light bulbs on store shelves two decades ago, taking the company to court was the smart way to fight back. Unfortunately, there is no court we can petition to ensure that regressive tax policies aren’t greenwashed in ways that trample the rights of the poor, community college students and working people. But there is at least one place we can fight for the smarter, more effective and more equitable environmental policies we need: the state legislature.

Hal Pitkin is a veteran Silicon Valley journalist and commentator, a founding editor of Marketplace on
Response to Comment Letter R96: Hal Plotkin

R96-1

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.

R96-2

Please see the response to Comment R94-10 for a discussion of travel times.

R96-3

As suggested by the commenter, the implementation of higher taxes on less efficient vehicles, road electrification, remote sensing vehicles, increased support for home-based work, and a change in tax structure are all beyond the scope of the proposed project. The project would not preclude or inhibit these initiatives.

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.

R96-4

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.
Comment Letter R97: Richard Rathbun

From: Richard <rathbun.r@gmail.com>
Sent: Thursday, August 09, 2018 9:46 AM
To: SM 101 DEIR EA Comments@DOT
Cc: governor@governor.ca.gov; crystal.yu@mail.house.gov
Subject: Managed lanes project 101

to whom it may concern:

I only recently heard about the plan to convert carpool lanes to toll lanes. In the article I read, Caltrans claims that only 200 cars per hour use the carpool lane, and converting to HOV or toll lanes will increase the number of autos using that lane, thus spreading the congestion more efficiently. I also read that the cost to make this change would be about $334 million, and I also read the revenue projections, both to local jurisdictions and to the State. One of my questions is just when and how was this 200 cars per hour arrived at? Measured over a 24 hour period? Or at rush-hour? If I have to venture out on our local freeways at rush hour, the traffic is way beyond 200 cars an hour in the carpool lane, so I wonder how the 200 cars per hour was determined?

All of this looks like another California S rip-off, and I have strong objections to the conversion. I am a lifelong resident of California (78 years) and have paid taxes, vehicle registration fees, etc. for much of my life.

I now have to pay to use State Parks at exorbitant rates to camp. Paying exorbitant rates for the use of parks that I helped to buy without any appreciation of my long-term contributions seems unjust. And to convert carpool lanes to pay lanes seems another move in the wrong direction for California. The wealthy benefit, and the retired, like myself, just cannot afford to pay each time we choose to move about during pay times. I almost had an accident recently while driving on an East Bay freeway with a pay-to-use lane because I was attempting to keep up with 70MPH traffic and at the same time read the fine print on the signs in an attempt to learn if I was in violation of some rule even though I had three occupants in my car. Confusing, dangerous, and undemocratic!

Ultimately, our California government must address the issue of growth and the long and short-term fiscal implications of growth. More people moving into our state are living off our past investments, while long-time residents like myself are subsidizing the future costs for this growth though dramatically increasing taxes on fuel, on vehicle registration, etc...at the same time paying for those who build in flood plains, in areas historically prone to wildfires, etc.

This supposed traffic management move is an obvious money-grab as one local politician claims. Our mayor here in Mountain View has formally objected to the change. And I believe the elimination of the carpool land, the cost, and the income to cities and the state, are all moves in the wrong direction.

Those of us in the middle are suffering and cannot afford to pay every time we do much of anything. I used to be able to camp in State Parks for free, now I have to pay $10 just for day-use, and $60 to camp overnight. All of this is making life in California more and more unaffordable for those of us who have worked all our lives and should be able to enjoy driving, camping, and living here in what was a wonderful state.

Please do not pursue this lane conversion! It is a move in the wrong direction. Put the money (and good thinking) toward really good transit, extend BART-like systems as we should have done long ago. When I travel, I am impressed by the transit systems in other places. Efficient. Not costly. Clean and well run. We could do the same. But we talk and talk, and put money into expanding our freeways. This is the wrong way to go.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Richard I. Rathbun  
573 View Street  
Mountain View CA 94041  
Rathbun.r@gmail.com

PS: I am trained as an architect and urban planner (Stanford 66) but worked as President, then CEO and Chairman of a 501-c-3 in Palo Alto for most of my 40 years of professional life. I have watched with some alarm, at many of the changes taking place in California (and the world) during most of my 78 years. Our “quality of life” has diminished over that time I am sad to say, and I look to the causes. The consequences of worshipping growth are making life increasingly painful. This attempt to change the status of carpool lanes is one move in a very wrong direction.

Response to Comment Letter R97: Richard Rathbun

R97-1

Priority use of the existing carpool lanes by HOVs south of Whipple Avenue will remain, as the proposed managed lanes prioritize HOVs and restrict SOVs during the most congested periods to maintain minimum average speeds.

According to the TOAR for the proposed project, the current HOV lanes in the southern section of the project area experienced volumes between 1121-1527 HOVs per hour in the peak hour. This data was derived from traffic counts on March 28, 2015 as part of the MTC HOV Occupancy Data. Please see the response to Comment R78-2 for a discussion of SOV and HOV use of the proposed project.

R97-2

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.

R97-3

The commenter’s opposition to the project is noted.
Comment Letter R98: Mark Rau

From: Mark Rau [mailto:mbrau@sbcglobal.net]
Sent: Wednesday, August 08, 2018 11:09 PM
To: 5M 101 DEIR EA Comments@DOT
Cc: tramaccountant@yahoo.com; kylastanuk6@gmail.com; yorey@sbcglobal.net; hunderwood@cityofsanmateo.org; czummich@cityofsanmateo.org; mbrau@sbcglobal.net; mwseinhauser@gmail.com
Subject: Additional comments and pictures for the 101 Managed Lane Project - Recirculated Partial Draft eir/ea Barrier 13 - S Amphlett San Mateo.

Hi - I hope all is well. These are additional comments and photos for the Partial Recirculation of the Draft Environmental Document for the 101 Managed Lane Project. These comments and photos refer to Barrier 13 on S. Amphlett in San Mateo. These pictures show the low and inadequate 8' sound wall along S. Amphlett. This wall does not cover the semi-truck’s smoke stack or wind pushers on top of the truck which you can easily see over the wall. This pushes hazardous dust, pollution, sound and exhaust up above the wall and through our neighborhoods residing all along Barrier 13.

The following picture is 10th looking toward freeway. This is one area where the sound channels freely up through the neighborhood. Yes - that is a big orange truck on the freeway about 6’ over the wall. You can also see how much taller the white truck is then the wall.
The following picture is on the area S-45 receptor was placed. Yes - right behind this building.

The following shows how big the buildings are. If you stood behind this building and then walked to 10th you would hear a tremendous difference in freeway noise.
The following picture is the grass area between the freeway and Arbor Rose. What you can’t see here is that the back end of this grass (toward Arbor Rose) is about 6’ higher than the street. When they built Arbor Rose - they raised the entire area 6’ to avoid the old flood zone. So really the foundation of the homes are about 2’ above that wall. The M46 receptor was added around here on the grass but was stationed lower than the wall height. Yes - that is another smoke stack blowing exhaust over the wall.
The human below is 6’2” in flip flops - hands reach almost to the top of the wall. Yes - that is a truck and another smoke stack. Clearly above the wall.

Cont.
The following picture shows what you see about half block up from freeway. You can really see the height difference between the tracks and the wall. This track is almost double the wall - smoke stack and all of that wind pushing exhaust, pollution, noise and hazardous dust through our neighborhood...all the way up along Burner 13.

The next picture is of two trucks. One going north and one going south. Little protection from the sound wall - either side of freeway.
Response to Comment Letter R98: Mark Rau

R98-1

As indicated by the commenter, this letter contains additional comments and pictures regarding sound walls on South Amphlett Boulevard. Please note that the responses to Comments R82 through R84 provide additional details regarding sound walls this area.

R98-2

This sound wall should be raised to 16'.

Thanks for your time.

Sincerely,

Mark Rau
Sunnybrae Neighborhood
San Mateo, California

Sent from iPhone
Section 2.2.6 describes the existing air quality in the proposed project area and evaluates the projected air quality with and without the Build Alternative. The proposed project would not result in a substantial increase in MSAT pollution or in an air quality violation for criteria pollutants.

R98-2

Please see the response to Comment R82-1 regarding the evaluation of increasing the height from the existing sound walls as part of noise abatement.

Please see the response to Comment R82-3 regarding Receptor ID M46 at the Arbor Rose development.
Appendix I Comments on the Draft EIR/EA and the Recirculated Partial Draft EIR/EA

Comment Letter R99: Marleta Roth

From: Marleta Roth <vanmartyr@sbcglobal.net>
Sent: Wednesday, August 08, 2018 8:16 PM
To: SM 101 DEIR EA Comments@DOT
Subject: Opposing toll roads in San Mateo County

Please consider other traffic solutions instead of the development of toll roads in San Mateo County. Toll roads will not solve the problem.

Development of a suitable alternate roads, the repair and replacement of infrastructure in the county and the correction of out-of-control rents as encouragement and incentive for drivers to carpool or take buses will only solve the problem. Pocketing millions of our dollars in an already strapped economy only hurts the citizens.

High rents and lack of affordable housing are causing people to work too far away from home. Bring us closer to our jobs and stop forcing us to pay more. Privilege of the rich should not be expanded to our highways.

Sincerely,
Marleta Roth
Daly City, CA 94014

Response to Comment Letter R99: Marleta Roth

As described in Section 1.3.1, one of the purposes of the proposed project is to increase person throughput (the number of people moved rather than the number of vehicles moved) in the US 101 corridor in San Mateo County. Construction of express lanes in the corridor would provide an incentive for travelers to carpool or take buses by reducing travel time for those travel modes. As further described in Section 2.1.5.3, implementation of the proposed project would result in a time savings for users of the express lanes. By 2040, the proposed project would also increase the total person throughput by 15 percent in both the northbound and southbound direction in the AM peak period. In the 2040 PM peak period, there would be increases in total person throughput of 18 percent and 5 percent for the northbound and southbound directions, respectively over the No Build Alternative.

Changes to housing policy and land use in San Mateo County are beyond the scope of the proposed project.
Comment Letter R100: Katie Talbot

From: Katie Talbot <katiea.talbot@hotmail.com>
Sent: Sunday, August 05, 2018 1:31 PM
To: SM 101 DEIR EA Comments@DOT
Subject: It is not ok to charge tolls for expedited travel along 101

Dear Cal Trans,

Here are three thoughts about managed lanes on highway 101.

In Chapter 1, you included this language: *The project limits include allowance for the installation of a new overhead tolling system and signage beginning approximately one mile in advance of the start of the managed lanes in each direction of US 101.*

This sentence is the reason that I took the time to comment on your report. Tolling for access to faster traffic is wrong, particularly in the SF Bay Area. The wealth disparity is so great around here that you are not choosing the people who have the greatest need to move quickly, you are choosing the people who can most afford it. That is wrong and anti-democratic.

Because you can program EZ pass however you want, you can allow access to "toll" lanes based on whatever criterion you ask EZ pass to require documentation for. Some options: hourly workers, delivery vehicles, handicapped, senior citizens, students, women only. The criterion of "most willing to pay" is the worst of these options.

101 is so busy in both directions it's clear that reversible lanes don't work. However, on highway 85 at certain hours of the morning, it would work beautifully. I used to enter 85S from 280 and it would be EMPTY down to Hwy 17 at 7 a.m. 85 North was already fully jammed up. Everyone would appreciate some traffic relief in the South Bay.

Thank you for your work on this issue. I have made employment choices, including leaving a good teaching job, because of highway 101.

Good luck and best regards,

Katie Talbot

Response to Comment Letter R100: Katie Talbot

R100-1

Several comments have been raised regarding fairness and equity. Please see the responses to Comments 11-5, 11-7, 37-1, 38-1, and 44-2 for this discussion.

R100-2

As described in Section 1.3, the purpose of the proposed project is to provide continuous traffic management in each direction on US 101 from the terminus of the VTA proposed express lanes in Santa Clara County to I-380 in northern San Mateo County. Improvements to Interstate 85 (I-85) in Santa Clara county are beyond the scope of the US 101 Managed Lanes Project.
Hi There,

In reading through the revised Chapter 1 there are several purposes listed for the project:
- continuous traffic management of the US 101 corridor in San Mateo & Santa Clara counties
- reduce congestion in the corridor
- encourage carpooling and transit use
- provide managed lanes for travel time reliability
- minimize operational degradation of the general purpose lanes
- increase person throughput
- apply technology and/or design features to help manage traffic

Later in the RPDEIREA there are many discussions on GHG/CO2 levels/emissions.

In section 1.4.5, the RPDEIREA references the change made in 2017 around a key assumption: the construction of the project can now be largely done within the existing right-of-way. This is an important change in a core assumption of this project. With this change, other "sub-alternatives" should have been added to account for the changed geometric assumptions because they enable other options/alternatives that would align with the purposes/goals of the project.

Specifically, areas south of Whipple Ave should have been furthered analyzed to see if adding an additional 4th general purpose through lane would meet the goals of the project. Having this 4th general purpose lane is in keeping with the basic geometry of US 101 north of Whipple Ave. This is not about adding a 4th lane in the entire length from Whipple Ave to the south end of the project and a corresponding lane in the northbound direction. Though a case can be made that that analysis should have been done.

Let's look at the location between Whipple Ave and Woodside Rd. Based on the analysis and data provided in Appendix H from AECOM in Figure 22, one can see there is a backup on southbound US 101 in the morning peak at Woodside Rd that extends upstream to Ralston Ave, approximately 4 miles. After Woodside Rd, US 101 freely flows again. Since there is right-of-way and the bridges (both the street overcrossings and the waterway overcrossing) are wide enough, why is the section between Whipple Ave and Woodside Rd not continuing the 4th general purpose lane that ends at Whipple Ave?

This "sub-alternative" aligns with the purposes listed for the project, and it would significantly reduce GHG/CO2 emissions in this location given the speeds of travel. On page 3-25, it is stated that the greatest GHG/CO2 levels are in the 0-25mph range. Per the analysis, vehicles will be traveling much of the time at this speed in the congestion.

Thus, for roughly a mile extension of the 4th lane, major benefits can be achieved over a 4 mile segment of the project. Also, this 4th lane would just be a continuation of the existing planned geometry/lanes before Whipple Ave traveling southbound. It provides a data driven location to end the 4th lane versus some arbitrary location from decades past.

Thank you,
Drew

Response to Comment Letter R101: (Unknown last name), Drew (1 of 9)

A supplemental Preliminary Study Report-Project Development Support (PSR-PDS) study was completed for the project in 2016, which identified conversion of the lanes as the alternatives to carry forward for further evaluation. The proposed project does add a fourth general purpose lane in this segment (Whipple Avenue and Woodside Road) by converting the auxiliary lane into a through lane in both directions.
Hi There,

In reading through the revised Chapter 1 there are several purposes listed for the project:
- continuous traffic management of the US 101 corridor in San Mateo & Santa Clara counties
- reduce congestion in the corridor
- encourage carpooling and transit use
- provide managed lanes for travel time reliability
- minimize operational degradation of the general purpose lanes
- increase person throughput
- apply technology and/or design features to help manage traffic

Later in the RPDEIREA there are many discussions on GHG/CO2 levels/emissions.

In section 1.4.5, the RPDEIREA reference the change made in 2017 around a key assumption: the construction of the project can now be largely done within the existing right-of-way. This is an important change in a core assumption of this project. With this change, other "sub-alternatives" should have been added to account for the changed geometric assumptions because they enable other options/alternatives that would align with the purposes/goals of the project.

Specifically, areas south of Whipple Ave should have been furthered analyzed to see if adding an additional 4th general purpose through lane would meet the goals of the project. Having this 4th general purpose lane is in keeping with the basic geometry of US 101 north of Whipple Ave. This is not about adding a 4th lane in the entire length from Whipple Ave to the south end of the project and a corresponding lane in the northbound direction. Though a case can be made that that analysis should have been done.

Let's look at the location between Woodside Rd and Marsh Rd. Based on the analysis and data provided in Appendix H from AECOM in Figure 23, one can see there is a backup on southbound US 101 in the afternoon peak at Marsh Rd that extends upstream to Holly St, approximately 5 miles. After Marsh Rd, US 101 freely flows again. Since there is right-of-way and no bridges, why is the section between Woodside Rd and Marsh not continuing a 4th general purpose lane (if extended from Whipple Ave already) or a 2nd Auxiliary Lane between the two?

The 4th lane (or 2nd Auxiliary Lane) would greatly reduce the backup from the Marsh Rd exit. This backup extends upstream to Holly Street, approximately 5 miles. The geometric constraints are similar to those in San Mateo. In the San Mateo location an additional lane was fit within the R/W. Here there is no pedestrian/bicycle overcrossing that would need to be reconstructed. Thus, a less expensive and less involved construction effort with significant benefits.

This aligns with the purposes listed for the project, and they would significantly reduce GHG/CO2 emissions in both locations given the speeds of travel. On page 3-26, it is stated that the greatest GHG/CO2 levels are in the 0-25mph range. Per the analysis, vehicles will be traveling much of the time at this speed in the congestion.

The extension of the 4th general purpose lane from Woodside Rd to Marsh Rd along with the extension of the 4th lane from Whipple Ave to Woodside Rd (discussed in a separate Public Comment) would provide significant improvements to the corridor and provide a much better location for the 4th lane to drop. This drop would be based on the data versus some arbitrary location from decades ago (i.e., Whipple Ave.). There is right-of-way, no bridge impacts, and reductions in GHG/CO2 emissions from significant congestion reduction. This is a win-win in keeping with the purposes of this project as outlined in the RPDEIREA.

Thank you,
Drew
Response to Comment Letter R102: (Unknown last name), Drew (2 of 9)

R102-1

The proposed project includes a fourth general purpose lane south of Whipple Avenue where feasible and beneficial by converting the auxiliary lane to a through lane. However, in this location, another lane would not address the bottleneck at the off-ramp intersection with Marsh Road. The congestion would extend beyond Woodside Road where the lane is suggested to start. A fourth general purpose lane would only provide storage for vehicles exiting at Marsh Road in the PM peak period. The extra lane would not address the bottleneck on Marsh Road, which is outside the scope of this project.

A second auxiliary lane was not included because it would make it more difficult for traffic using the Woodside Road on-ramp, as they would need to weave across two auxiliary lanes.

In addition, in the southern portion of the project area, sufficient width is not available to add a lane without substantial impacts to frontage roads including East Bayshore Road, West Bayshore Road, Pierce Road, Van Buren Road, and Rolison Road.
Comment Letter R103: (Unknown last name), Drew (3 of 9)

From: Drew <ocean1618@zoho.com>
Sent: Thursday, August 09, 2018 3:37 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP RPDEIREA comments - Chptr 1 - Alts (SB Willow to University)

Hi There,

In reading through the revised Chapter 1 there are several purposes listed for the project:
- continuous traffic management of the US 101 corridor in San Mateo & Santa Clara counties
- reduce congestion in the corridor
- encourage carpooling and transit use
- provide managed lanes for travel time reliability
- minimize operational degradation of the general purpose lanes
- increase person throughput
- apply technology and/or design features to help manage traffic

Later in the RPDEIREA there are many discussions on GHG/CO2 levels/emissions.

In section 1.4.5, the RPDEIREA reference the change made in 2017 around a key assumption: the construction of the project can now be largely done within the existing right-of-way. This is an important change in a core assumption of this project. With this change, other "sub-alternatives" should have been added to account for the changed geometric assumptions because they enable other options/alternatives that would align with the purposes/goals of the project.

Specifically, areas south of Whipple Ave should have been furthered analyzed to see if adding an additional 4th general purpose through lane would meet the goals of the project. Having this 4th general purpose lane is in keeping with the basic geometry of US 101 north of Whipple Ave. This is not about adding a 4th lane in the entire length from Whipple Ave to the south end of the project and a corresponding lane in the northbound direction. Though a case can be made that that analysis should have been done.

Looking at the analysis and data provided in Appendix H from AECOM in Figure 22, in the morning SB direction between Willow Rd and University Ave, it appears an additional lane could make a significant improvement. The geometric constraints are similar to those in San Mateo. In the San Mateo location an additional lane was fit within the right-of-way. Here there is no pedestrian/bicycle overcrossing that would need to be reconstructed. Thus, a less expensive and less involved construction effort with possible significant benefits. More analysis needs to be done that would include studying the NB direction "requirements" to see what geometric options are available.

This location's potential improvement is in alignment with the purposes listed for the project, and it would significantly reduce GHG/CO2 emissions in both locations given the speeds of travel. On page 3-26, it is stated that the greatest GHG/CO2 levels are in the 0-25mph range. Per the analysis, a fair number of vehicles will be traveling much of the time at this speed in the congestion.

Thank you,
Drew

Response to Comment Letter R103: (Unknown last name), Drew (3 of 9)

R103-1

This comment asks about adding an additional lane in the southbound direction on US 101 between Willow Road and University Avenue, in Palo Alto.

There is an existing auxiliary lane within this segment. The freeway shoulder is bordered by a sound wall in the southbound direction towards the University Avenue exit. Outside of that wall is West Bayshore Boulevard. With the proposed project, this segment of the freeway is proposed for a conversion of the existing HOV lane to express lane use. No widening of pavement is proposed. With the US 101/Willow Avenue Interchange project, Caltrans could not extend the auxiliary lane underneath the Willow Avenue overcrossing on northbound or southbound US
101. In addition, for a fourth general purpose lane to be effective it would need to be carried through the PM peak period bottleneck between the Rengstorff Avenue on-ramp and the SR 85 off-ramp on southbound US 101. This type of improvement is outside the limits of the proposed project.
Hi There,

In reading through the revised Chapter 1 there are several purposes listed for the project:
- continuous traffic management of the US 101 corridor in San Mateo & Santa Clara counties
- reduce congestion in the corridor
- encourage carpooling and transit use
- provide managed lanes for travel time reliability
- minimize operational degradation of the general purpose lanes
- increase person throughput
- apply technology and/or design features to help manage traffic

Later in the RPDEIREA there are many discussions on GHG/CO2 levels/emissions.

In section 1.4.5, the RPDEIREA reference the change made in 2017 around a key assumption: the construction of the project can now be largely done within the existing right-of-way. This is an important change in a core assumption of this project. With this change, other "sub-alternatives" should have been added to account for the changed geometric assumptions because they enable other options/alternatives that would align with the purposes/goals of the project.

Specifically, areas south of Whipple Ave should have been furthered analyzed to see if adding an additional 4th general purpose through lane would meet the goals of the project. Having this 4th general purpose lane is in keeping with the basic geometry of US 101 north of Whipple Ave. This is not about adding a 4th lane in the entire length from Whipple Ave to the south end of the project and a corresponding lane in the northbound direction. Though a case can be made that that analysis should have been done.

While the analysis and data shown in Appendix H from AECOM in the southbound direction provides relatively clear locations where a 4th lane would be beneficial, in the northbound direction these locations are not as straight forward. In Figure 20, in the morning NB direction there is congestion caused by the drop of the second HOT lane that extends upstream and downstream until University Ave. Further analysis should be done to determine if extending the 2nd HOT lane until University Ave is warranted or a possible 4th general purpose lane addition in this location. Then reviewed with the available right-of-way constraints. Based on the success of adding an additional lane back in San Mateo in a similar geometric layout, something maybe possible here.

In Figure 21, in the afternoon NB direction, the congestion based the data and analysis in Appendix H appears to indicated multiple overlapping causes. Working in reverse direction, 3rd Ave, CA-92, Hillsdale Blvd, Ralston Ave, Whipple Ave, and Sessport Blvd all appear to cause upstream backups to some extent. Though, Hillsdale Blvd and 3rd Ave along with CA-92 seem to be key congestion generating sources. It is unclear if a 4th general purpose lane in any locations south of Whipple Ave (from the project starting point) would be a significant benefit.

If any of the above congestion can be reduced, then reduced GHG/CO2 emissions could be achieved given the speeds of travel over much of this part of the corridor. On page 3-25, it is stated that the greatest GHG/CO2 levels are in the 0-25mph range. Per the analysis, vehicles will be traveling much of the time at this speed in the congestion.

Thank you,
Drew
Response to Comment Letter R104: (Unknown last name), Drew (4 of 9)

R104-1

The proposed project includes a fourth general purpose lane south of Whipple Avenue where feasible and beneficial by converting the auxiliary lane to a through lane, including in the areas described in this comment.
Comment Letter R105: (Unknown last name), Drew (5 of 9)

From: Drew <ocean1618@zoho.com>
Sent: Thursday, August 09, 2018 4:12 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP-RPDEIREA comments - Ralston on-ramps to NB 101

Hi There,

In reviewing the analysis and data provided in Appendix H from AECOM in Figure 21, there is an area where very minor adjustments to the current/proposed geometry of US 101 would reduce congestion and improve the flow of the mainline which would then lead to reduced GHG/CO2 emissions.

The on-ramp from EB Ralston Ave to NB US 101 should be the start of the Auxiliary Lane vs. the current situation of it starting with WB Ralston on-ramp. Why? The force merging of vehicles from the EB Ralston Ave on-ramp into the mainline lanes is causing the congestion to be worst upstream. The congestion is already there and made worse by the merging in traffic. The data supports this by the speed drop upstream of the merging. There is right of way and no bridge adjustments required to make this change. As to one potential argument about the heavy on-ramp traffic from WB Ralston Ave, this can be dealt with in two ways. First, the flow of traffic from EB Ralston Ave on-ramp is not so heavy to prevent the WB on-ramp traffic from merging. Second, the merging area can be extended to allow for a better merge experience. The irony here is the pavement was placed to do just this back during the earlier Auxiliary Lane project.

This addition aligns to the project purposes by reducing congestion in the corridor. This area will be under construction as part of the project so the additional cost will be minimal for the improvements achieved especially reduced GHG/CO2 emissions/levels with some less congestion.

Thank you,
Drew

Response to Comment Letter R105: (Unknown last name), Drew (5 of 9)

R105-1

This comment suggests that the existing auxiliary lane should start where eastbound Ralston Avenue merges onto northbound US 101. The auxiliary lane starts just north of this point, where the westbound Ralston Avenue ramp merges onto the northbound freeway. The eastbound Ralston Avenue on-ramp is a low volume ramp that isn’t causing a bottleneck. The bottleneck is the result of heavy volume from the westbound Ralston Avenue on-ramp. Starting the auxiliary lane at the eastbound Ralston Avenue on-ramp could cause additional queuing on local streets at the westbound Ralston Avenue on-ramp, as this traffic would need to merge with the eastbound Ralston Avenue on-ramp traffic.
Comment Letter R106: (Unknown last name), Drew (6 of 9)

From: Drew <ocean1618@zoho.com>
Sent: Thursday, August 09, 2018 4:27 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP-RPDEIREA comments - Chapter 6 - Distribution Listings

Hi There,

Please update the distribution listing to bring it current. There are at least two updates, specifically the Mayor of the City of San Mateo and the Director of Public Works of the City of San Carlos. There may be other updates as well.

Thank you,
Drew

Response to Comment Letter R106: (Unknown last name), Drew (6 of 9)

R106-1

Chapter 6 of the Final EIR/EA has been updated. Specifically, the Mayor of San Mateo and the San Carlos Director of Public Works have both been updated.
Comment Letter R107: (Unknown last name), Drew (7 of 9)

From: Drew <ocean1618@zoho.com>
Sent: Thursday, August 09, 2018 4:41 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP-RPDEIREA comments - NB US 101 & Hillsdale off-ramp

Hi There,

In reviewing the analysis and data provided in Appendix H from AECOM in Figure 21, one location that is causing part of the backup/congestion on US 101 could and should be improved as part of this project since it aligns to the project's purposes/goals:
- continuous traffic management of the US 101 corridor in San Mateo & Santa Clara counties
- reduce congestion in the corridor
- encourage carpooling and transit use
- provide managed lanes for travel time reliability
- minimize operational degradation of the general purpose lanes
- increase person throughput
- apply technology and/or design features to help manage traffic

The adjustment to the current/proposed geometry would reduce congestion and improve the flow of the mainline which would then lead to reduced GHG/CO2 emissions. This was another purpose/goal discussed later in the RPDEIREA.

The Hillsdale Blvd off-ramp volumes of traffic are so heavy they are impacting the mainline throughput. It is somewhat hidden by the congestion from CA-92 and 3rd Ave working upstream from both locations. Looking at the data, the speed of the traffic starts to improve with the on-ramps from Hillsdale Blvd to US 101. This is counter intuitive especially considering the significant weaving that is happening between the on-ramps from Hillsdale Blvd and the off-ramps for CA-92. What is happening after the Hillsdale Blvd off-ramp backup is passed, traffic on US 101 starts to adjust and gains speed in spite of the Hillsdale Blvd on-ramps onto NB US 101.

A 2nd off-ramp lane is needed to pull all the exiting traffic for Hillsdale Blvd out of the right through lane. There is no new right-of-way and no changes to existing bridges needed. The exit volumes of traffic will only increase given the new developments being built and proposed for both Foster City and San Mateo. To the argument that this isn't part of the 101 Managed lanes project, that is a red-hearing because making this change improves the mainline flow on US 101 (see the purposes/goals above for the rest). There are few other locations within the project corridor that have this same impact and "easy fix" (e.g., no soundwall reconstruction, no need to remove the shoulder to squeeze it in, etc.). Yes, this is a different solution (i.e., not splitting the through/exit traffic in the right through lane), but the congestion caused here can be fixed with this type of solution. There is 1 mile between the Ralston on-ramps and the Hillsdale Blvd off-ramp to allow for traffic to move to the appropriate lanes, be it the through lanes or the off-ramp.

Lastly, making this change is is not related to the CA-92/US 101 interchange project since it is impacting the mainline 101 lanes and has nothing to do with the CA-92/US 101 interchange. The on-ramps from Hillsdale Blvd to NB US 101 would be part of the interchange project since they are part of the "cross-weave" that needs to be solved.

The cheapest design and construction cost to do this effort is as part of this project and should have been part of the project to begin with. It aligns with the purposes/goals of the project (versus a stand alone project to achieve what goal).

Thank you,
Drew
Response to Comment Letter R107: (Unknown last name), Drew (7 of 9)

Both the northbound and southbound off-ramps at E. Hillsdale Boulevard are already two lane ramps. The right-hand lane of each ramp connects to an auxiliary lane (traffic in the right-most lane must exit).

High traffic volumes use the northbound US 101 to eastbound SR 92 off-ramp in the PM period as it provides access to the San Mateo Bridge. Because of congestion at this location, travelers also use the northbound US 101 to eastbound E. Hillsdale Boulevard ramp to bypass the SR 92 interchange. This comment suggests adding an additional exit ramp lane at or near E. Hillsdale Boulevard that would allow traffic to exit and head towards local community destinations in the Foster City area, southeast of the US 101/SR 92 and US 101/E. Hillsdale Boulevard interchanges. However, this would not address the bottleneck at the off-ramp intersection with Hillsdale Boulevard as the demand is greater than the capacity of this off-ramp intersection. In addition it would be more difficult for westbound Ralston Avenue on-ramp traffic, as they would need to weave across two auxiliary lanes.

The San Mateo County Transportation Authority is currently proceeding with preliminary studies to evaluate solutions to the US 101/SR 92 interchange, considering such options as new direct connectors, overpass ramps, and frontage roads. These improvements would proceed as a separate project from the US 101 Managed Lanes Project, if programmed by Caltrans and local transportation authorities.
Comment Letter R108: (Unknown last name), Drew (8 of 9)

From: Drew <ocean1618@zoho.com>
Sent: Thursday, August 09, 2018 4:51 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP RPDEIREA comments - Chptr 3 - CEQA Checklist, p 3-9

Hi There,

Referencing the Table "HAZARDS AND HAZARDOUS MATERIALS" on page 3-9, specifically item g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? It is checked with "Less Than Significant Impact". I believe this is wrong. One can debate is the correct check box "Significant and Unavoidable Impact" or "Less Than Significant with Mitigation Incorporated".

I believe this is wrong because in many locations on this project the shoulders are being reduced to basically having no shoulder at all. If there is a Hazardous Waste accident during much of the day and, depending on where the accident happens, the emergency vehicles will not be able to reach the location as timely as they currently can. To say this is "less than significant impact" when there have been some significant Hazardous Material accidents in the past recent years that have closed major highways in their aftermath I believe is wrong.

This item in-of-itself is not a reason not to do the project. It just needs to be checked correctly and any appropriate actions made accordingly.

Thank you,
Drew

Response to Comment Letter R108: (Unknown last name), Drew (8 of 9)

R108-1

The proposed project has been designed according to the Caltrans Highway Design Manual. In some locations, shoulders would be narrower than what is specified in Chapter 300 of the Highway Design Manual. Design exceptions were sought and granted to document these design deviations. Areas of narrower shoulders would be similar to other areas of the freeway that are narrow due to physical constraints such as bridges or waterways. Emergency vehicle response times are not expected to be reduced due to the proposed project.
Comment Letter R109: (Unknown last name), Drew (9 of 9)

From: Drew <ocean1618@zoho.com>
Sent: Thursday, August 09, 2018 4:38 PM
To: SM 101 DEIR EA Comments@DOT
Subject: 101 MLP-REDEIREA comments - Chptr 3 - CEQA Checklist, pgs. 3-15, 3-16, & 3-18

Hi There,

Referencing the Table "TRANSPORTATION/TRAFFIC" on pages 3-15 & 3-16, specifically item e) Result in inadequate emergency access? It is checked with "Less Than Significant Impact". I believe this is wrong. One can debate is the correct check box "Significant and Unavoidable Impact" or "Less Than Significant with Mitigation Incorporated".

I believe this is wrong because in many locations on this project the shoulders are being reduced to nearly having no shoulder at all. This will most definitely impact "emergency access". Is it "inadequate"? Depends on the nature of the emergency and when it happens. Is there a mitigation? That should be the analysis done. There will be situations the emergency crews will be delayed in reaching the site of the emergency given there will be less access in the build out conditions especially under some road overcrossings and over some waterway bridges. This is not discussed in the write-up on page 3-18.

This item in-of-itself is not a reason not to do the project. It just needs to be checked correctly and any appropriate actions made accordingly.

Thank you,
Drew

Response to Comment Letter R109: (Unknown last name), Drew (9 of 9)

R109-1

Please see the response to Comment R108-1.
This page intentionally left blank