



**SPUR**

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Yolanda Rivas  
California Department of Transportation, District 4  
111 Grand Avenue, MS 8B  
Oakland, CA 94612  
Email: [sm101scoping@dot.ca.gov](mailto:sm101scoping@dot.ca.gov)

RE: US 101 Managed Lanes Project, SCH# 2016102045

Dear Yolanda Rivas,

SPUR is a member-supported nonprofit organization that promotes good planning and good government in the San Francisco Bay Area through research, education and advocacy. We appreciate the opportunity to comment on Draft Environmental Impact Report (DEIR) for the Highway 101 Managed Lanes Project.

Highway 101 should become a part of the region's managed lane network and should support transit, not just private cars. Many cities in the county are planning growth near transit; Highway 101 needs to support how cities intend to grow. Doing otherwise undermines the region's economy and threatens its ability to meet sustainability goals. The least expensive and fastest way to add a managed lane to Highway 101 is to convert an existing lane; new construction is costly and likely counterproductive.

This study provides the opportunity to develop a comprehensive project that can move many more people by maximizing the efficiency of the existing lanes, and modeling the benefits of expanded transportation choices and incentives that promote car sharing, vanpooling, transit use and other alternatives to driving alone. SPUR thinks there is much untapped potential with Caltrain, walking and biking and transportation innovation.

The preferred alternative for the managed lanes project should be the options that move more people and expand transportation choices rather than focusing on moving more cars, resulting in less congestion, a reduction in Vehicle Miles of Travel (VMT), Greenhouse Gas Emissions (GHG), and particulate pollution to help meet public health, climate and social equity goals. Precious transportation dollars should be used on projects with many co-benefits—not just those that help peak hour commuters.

While the focus of this DEIR are managed lanes for San Mateo County, to maximize the benefits of a managed lane and solve congestion more systematically, we recommend using one policy framework for lane management across county lines and that the three counties work together on

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their managed lane efforts. This way, the highway can operate with one set of goals. The DEIR should study the impact of continuing the managed lane into the other counties.

As part of the Draft EIR, we recommend the following items be studied for opportunities to reduce and mitigate the environmental impacts of the project:

- Fully analyze the implications of project alternatives on VMT, mode share, and GHG emissions, including the effects of induced demand, to the greatest degree possible for each scenario.
- Study managed lane alternatives that include the continuation of Managed Lanes North of I-380, and then continuing onto 280 North after the 101/280 split. San Francisco is now studying this alternative, and we believe it would be likely to happen if San Mateo also develops managed lanes.
- Analyze different influencing factors, such as congestion pricing, transit service level, and TDM measures on the performance of the managed lanes project alternatives.
- Study the impact of project timing with respect to other regional transportation projects such as Caltrain electrification on vehicle delay and person throughput.
- Study the equity impacts of each alternative and consider the local context; identify strategies to ensure that the managed lanes are a net benefit to low-income travelers.
- Consider multiple mitigations for VMT and GHG impacts including shuttles, additional public bus service, Caltrain capacity with electrification and blended service with High Speed Rail.

We look forward to a continued dialogue to ensure that the focus for Highway 101 is converting existing lanes to managed lanes and moving more people rather than adding cars, pollution and parking in communities.

Sincerely,



Ratna Amin  
SPUR Transportation Policy Director