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LOMA PRIETA

Sierra Club Loma Prieta Chapter

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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)¹ under AB32 and SB32. The reductions are required under SB375 (page 3)². 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)³. This 1% growth in VMT is the source of California difficulty⁴ in meeting its Greenhouse Gas reduction targets.

The EIR says compared to No Build, the Build Alternative would see a growth of 1.3% in Vehicles Miles Travelled (VMT) expected by 2020 and 1% by 2040 (2-152). This is as bad as Business As Usual (BAU) can get; and is both wrong and illegal. Caltrans' inability to understand that the critical contributors to climate change⁵ where

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https://ncst.ucdavis.edu/wp-content/uploads/2017/03/State-Level-VMT-Strategies-White-Paper_FINAL-03.2017.pdf

² http://www.ppic.org/content/pubs/report/R_211LBR.pdf

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http://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/SanMateoCo_%20Inventory&ReductionTargetMemo-3-5-12.pdf

⁴ <http://beta.latimes.com/opinion/editorials/la-ed-ceqa-vmt-20171216-story.html>

⁵ <https://www.arb.ca.gov/cc/inventory/data/data.htm>

transportation is the largest contributor- 39%, (61% in San Mateo County (page 9)⁶) and the fixes under AB32, need immediate remedy. The remedy needs to be existential - Californians face increased fires, precipitation patterns, and drought from climate change⁷. 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)” 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 101⁸, heavily biased to favor expansion, admits that at certain times the project will make congestion worse⁹! 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 Seattle¹⁰, 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.

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http://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/SanMateoCo_%20Inventory&ReductionTargetMemo-3-5-12.pdf

⁷ <https://oag.ca.gov/environment/impact>

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<http://www.peoplepoweredpress.org/2017/11/22/draft-environmental-review-recommends-widening-highway-101/>

⁹ <http://www.transformca.org/transform-blog-post/proposed-express-lanes-wont-fix-traffic>

¹⁰ <https://usa.streetsblog.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 CTP2040¹¹: “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 Davis¹² 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 rates¹³, despite a similar death rates to rural areas. Cancer is the second leading cause of death¹⁴. The leading cause, heart disease is related to a sedentary lifestyle caused by driving¹⁵. Asthma is growing and linked to the distance from the large road¹⁶. Car crashes are the 12th leading cause of death- but the leading causes for people between 12 and 25 years of age. The lost life years ranked seventh¹⁷. 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

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<http://www.dot.ca.gov/hq/tpp/californiatrnsportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf>

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https://ncst.ucdavis.edu/wp-content/uploads/2017/03/State-Level-VMT-Strategies-White-Paper_FINAL-03.2017.pdf

13 <https://www.medscape.com/viewarticle/882577>

14 <https://www.medicalnewstoday.com/articles/282929.php>

15 <http://www.iosrjournals.org/iosr-jnhs/papers/vol4-issue2/Version-1/E04212025.pdf>

16 <https://www.ncbi.nlm.nih.gov/pubmed/19770354>

17 <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/812203>

Governments (SANDAG) reveals. The Court of Appeal affirmed¹⁸ 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 people¹⁹ and the planet²⁰ with pollution and GHG. These are all reasons not to approve this EIR.

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.

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

¹⁸

https://www.biologicaldiversity.org/news/press_releases/2017/san-diego-transportation-11-16-2017.php

¹⁹

<http://news.mit.edu/2013/study-air-pollution-causes-200000-early-deaths-each-year-in-the-us-0829>

²⁰ <http://nymag.com/daily/intelligencer/2017/07/climate-change-earth-too-hot-for-humans.html>

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 says²¹: "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,



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<https://smartgrowthamerica.org/policy-7-complete-streets-must-designed-serve-current-future-land-use/>