



Incorporated October 22, 1956

CITY OF SARATOGA

13777 FRUITVALE AVENUE • SARATOGA, CALIFORNIA 95070 • (408) 868-1200

COUNCIL MEMBERS:

*Manny Cappello
Jill Hunter
Emily Lo
Howard Miller
Chuck Page*

February 25, 2014

Ngoc Bui
Department of Transportation, District 4
PO Box 23660, MS 8B
Oakland, CA 94623-0660
85expresslanes@urs.com

Re: City of Saratoga Comments on the State Route 85 Express Lanes
Project Initial Study

Dear Mr. Bui:

The City of Saratoga appreciates the opportunity to submit comments on the Initial Study with Proposed Negative Declaration/Environmental Assessment (“IS”) for the proposed State Route (“SR”) 85 Express Lanes Project (“Project”) proposed by State of California Department of Transportation (“Caltrans”) in cooperation with the Santa Clara Valley Transportation Authority (“VTA”). The Project would convert the existing High-Occupancy Vehicle (“HOV”) lanes on SR 85 to express lanes, allowing single-occupant vehicles (“SOV”) to pay a toll to use the lanes, while HOVs would continue to use the lanes at no cost. The Project also includes paving the existing 46-foot median to construct a second express lane, which would be added in both directions on SR 85 between I-280 and SR 87 including the entire stretch of SR 85 through Saratoga, adding a new auxiliary lane along a 1.1-mile segment of northbound SR 85 in Cupertino between South De Anza Boulevard and Stevens Creek Boulevard, and widening a number of bridges along SR 85.

These comments focus on information presented in the IS and additional information that is needed for the City, its residents, VTA, and Caltrans to have a full understanding of the Project and its potential effects. We understand that the IS is one part of the process and that Caltrans and VTA will continue to work with Saratoga, other cities, and the public to review the Project and determine whether it is the most effective use of public resources at this time and if so how best to move forward.

The IS concludes that the Project will have no significant adverse effects on the environment. The City agrees that if Caltrans and the VTA decide to move forward with the Project they should do so in a manner that avoids all impacts. The IS, however, does not contain sufficient information to assure the City and concerned members of the public that this will be the case. These comments discuss portions of the IS that require further

information and analysis, and possibly additional project design work, to demonstrate that the Project will not have adverse impacts on our community.

I have attached detailed comments and questions regarding the IS. The City is particularly concerned with potential noise impacts and the Project's possible effects on traffic. In addition, the IS analysis of visual impacts and impacts to air quality do not demonstrate with sufficient certainty that the Project will not have adverse effects in these areas.

Noise from SR 85 already far exceeds that expected at the time it was approved. Widening SR 85 will increase these noise levels throughout the Project area. The Project presents an opportunity to include measures to reduce existing noise levels or, at a minimum, ensure that the Project does not result in any increase beyond existing noise levels. The IS, however, does not properly analyze either existing conditions or the noise impacts associated with either Project operations or construction. It also fails to consider a wide range of mitigation techniques that could be used to avoid the noise impacts altogether. Further analysis is needed to ensure that we have a complete understanding of the full range of potential noise impacts and that the Project includes an aggressive program to reduce noise impacts from SR 85.

The City is also concerned with the potential traffic impacts associated with the Project. It appears that the Project could have the effect of increasing, rather than reducing, traffic delays. For example, the IS does not address the significant traffic congestion at the SR 85/Highway 280 interchange. Without improvements there, the express lane project could serve simply to deliver more traffic to an already unacceptable bottleneck. Before further evaluating the policy merits of the Project, the evaluation of the Project's traffic impacts should be revised to: (a) use correct and clearly established significance thresholds; (b) correct those analyses that are inaccurate, illogical and potentially misleading; (c) add analysis of impacts (and associated mitigation) to the local and regional transportation network including the transit, bicycle and pedestrian systems; and (d) describe how construction of the Project would affect Saratoga's local streets and how those effects would be mitigated.

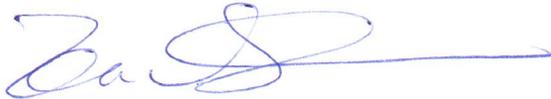
SR 85 cuts through the heart of the Saratoga community. For this reason the design of the proposed Project are critical elements to the quality of life of Saratoga residents. Accordingly, a thorough assessment of the Project's potential visual impacts as described in the attached comments is essential. In addition, Saratoga is concerned that the Project be designed to improve rather than worsen air quality. The region does not attain state standards for ozone, PM_{2.5}, or inhalable particulate matter (PM₁₀) standards. Accordingly it is critical that the public, as well as VTA and Caltrans have sufficient information to fully understand the Project's impacts and design strategies to avoid those impacts.

Finally, there have been conflicting reports regarding various aspects of the Project's design and relationship to other VTA and Caltrans plans. Please clarify the following:

1. Will the Project require or otherwise allow a change to the current ban on heavy trucks using SR 85?
2. Can the Project be revised to allow immediate access from Saratoga Avenue to the express lanes for carpools (as is currently the case) and drivers wishing to pay the express lane use fee?
3. How does VTA plan to move forward with the Project consistent with its 1989 commitment to (i) limit SR 85 to 6 lanes and (ii) reserve the 46 foot median for mass transportation?

Thank you for your attention to these comments. We look forward to your response.

Very Truly Yours,



Emily Lo
Mayor, City of Saratoga

cc: Saratoga City Council
City Manager
City Clerk

Attachment: Detailed Comments and Exhibits