

January 14, 2015

Board of Directors
Santa Clara Valley Transportation Authority
3331 North 1st Street
San Jose, CA 95134

Re: El Camino Real Bus Rapid Transit Project Draft Environmental Impact Report

Dear Chair Woodward and Board of Directors:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed El Camino Real Bus Rapid Transit (BRT) project. SPUR is a non-profit, member-supported organization that promotes good planning and good government. Over the past two years, we undertook a major research project focused on South Bay transportation. This research resulted in the SPUR report *Freedom to Move, how the Santa Clara Valley Transportation Authority can create better transportation choices in the South Bay*.

SPUR supports fully-featured Bus Rapid Transit on high ridership corridors as a way to provide transit backbones for compact neighborhoods. Research and experience show certain bus service elements drive improved operations and ridership. These include transit priority on streets and at intersections, median-of-street boarding, off-board fare payment and high-amenity stations.

SPUR recommends that the El Camino BRT project alternative, which includes continuous dedicated lanes throughout the corridor from Santa Clara to Palo Alto, move forward for approval (Alternative 4c). Based on information disclosed in the DEIR, SPUR believes this project will produce important, much-needed benefits for cities along this corridor and throughout the region. Specifically, the project would:

- 1. Noticeably improve the character of streets and neighborhoods:** The proposed project includes street reconstruction, safer crosswalks, cyclist improvements and landscaping in station areas. With the loss of redevelopment funding, these kinds of broad improvements would be difficult to fund without this project. Cities through this corridor have General Plan and Specific Plan visions for compact, sustainable communities. Rapid bus service is a necessary

transportation foundation to achieve these neighborhood objectives. Compact growth can be achieved when neighborhoods are designed for walking and transit – instead of autos movement and parking.

- 2. Substantially improve transit with minimal impacts on autos:** Traffic conditions along the El Camino Real corridor are projected to worsen in coming years. For those who don't drive, transit is currently an unreliable and slow choice, as buses are stuck in traffic. The DEIR states that dedicated lanes reduce bus travel time through this corridor from 85 to 48 minutes, and allow VTA to offer 10-minute service. It also concludes that dedicated lanes would have few impacts on autos, and that these effects would be spread over a large area. Rapid bus service solves a geometry problem on streets: it can move far more people in a smaller amount of space than autos. It is important to note that since the passage of SB 743 in 2013, auto delay is not considered environmental impacts under CEQA.
- 3. Use transit funding effectively:** High transit speeds also improve cost-efficiency. The DEIR states that a dedicated lane option costs \$13 million annually to serve over 18,000 daily riders, compared with today's cost of \$19 million to serve 12,000 daily riders. These improvements free up transit operating funds for other transit services. Dedicated-lane alternatives will be competitive for up to \$75 million in Federal Small Starts funding, while the mixed-flow alternatives will not be. The multi-billion dollar BART extension to Silicon Valley will require quality feeder transit to achieve ridership and farebox recovery goals.
- 4. Grow the South Bay's interconnected, high-speed transit network:** Where VTA has increased transit speed and express services, ridership has grown. Rapid bus transit routes are key elements of the regional transit network, and are needed for quick connections with Caltrain, ACE, Capitol Corridor and the anticipated BART Silicon Valley Extension. BRT on El Camino Real provides a necessary, more affordable transit complement to Caltrain.

The El Camino Real BRT corridor was carefully chosen for study by the VTA board in 2009 when the Bus Rapid Transit Strategic Plan identified it has a market for great transit. VTA's 522/22 line has one of the highest ridership rates in the region today. Fully featured BRT, with dedicated lanes and frequent service, is the appropriate transit technology to serve this market today and in the future. We may not get this investment opportunity again.

Thank you for your consideration. Please contact us with any questions.

Sincerely,



Ratna Amin
SPUR Transportation Policy Director