

South Bay Cities Council of Governments

June 25, 2020

TO: SBCCOG Board of Directors
FROM: SBCCOG Transportation Committee
RE: SBCCOG Comments on I-105 ExpressLane DEIR

Adherence to Strategic Plan:

Goal B: Regional Advocacy. Advocate for the interests of the South Bay.

Background

California Department of Transportation (Caltrans), as assigned by FHWA, is the lead agency under NEPA and is the lead agency under California Environmental Quality Act (CEQA) for the proposed I-105 ExpressLane project. Caltrans has released a draft Environmental Impact Report and Environmental Assessment for continuous managed lanes in the eastbound and westbound directions of Interstate 105 (I-105) in Los Angeles County between the termini of the existing high-occupancy vehicle (HOV) lanes west of Interstate 405 (I-405) in the City of Los Angeles and east of Interstate 605 (I-605) to Studebaker Road in the City of Norwalk.

The I-105 corridor general purpose lanes currently experience recurring congestion and heavy demand during peak commute hours that exceeds the freeway's maximum operational capacity. In addition, sections of the eastbound and westbound I-105 HOV lanes are classified as degraded as defined by federal standards because speeds on the HOV lanes operate at less than 45 miles per hour (mph) during peak periods for more than 10% of the time. The HOV analysis identified multiple locations with HOV lanes operating at LOS F. This is caused by congestion in the mainline traffic and by the HOV lane bottlenecks.

The project is needed to help address the deficiencies on I-105 within the project limits. The deficiencies are summarized below:

- Current daily traffic demand on some sections of I-105 exceeds capacity due to heavy traffic on both weekdays and weekends
- The existing traffic of the mixed flow and HOV lanes of the I-105 exceeds the capacity of the interstate, thus, future operating conditions will be further deteriorated
- According to the 2016 California High-Occupancy Vehicle Lane Degradation Determination Report (Caltrans, 2017) and the 2016 California High-Occupancy Vehicle Lane Degradation Action Plan (Caltrans, 2017) the existing I-105 HOV facilities are degraded and the travel speed is below 45 miles per hour during peak periods

Project Description

The project traverses the cities of El Segundo, Inglewood, Hawthorne, Los Angeles, Lynwood, South Gate, Paramount, Downey, Norwalk, and unincorporated areas of Los Angeles County. The project limits include allowance for the installation of a new overhead tolling system and signage.

The project seeks to convert the existing HOV lanes to ExpressLanes by deploying dynamic pricing as a means to optimize existing capacity thereby offering greater travel time reliability and enhanced mobility choice to travelers. Dynamic pricing allows for the adjustment of toll rates in real-time based on actual traffic conditions in which HOV lane speed is below 45 miles per hour during peak periods.

The EIR/EA includes three alternatives, as follows:

Alternative 1 – No-Build Alternative: Existing Conditions - The No-Build alternative does not include improvements to the existing lanes within I-105.

Alternative 2 – Build Alternative: Convert the existing HOV Lane to One ExpressLane (Standard Lane and Shoulder Widths) This build alternative would convert the existing bi-directional HOV lanes, from Imperial Highway/Sepulveda Boulevard Intersection to Studebaker Road, to an ExpressLane in each direction. The freeway would be restriped within the existing footprint to accommodate one 12-foot wide ExpressLane with a 4-foot wide buffer separating the ExpressLane from the 12-foot general purpose lanes. Dynamic pricing would be deployed to address existing degradation of the HOV lane.

This alternative also proposes improvements to the I-110 corridor to place associated signage approaching the connecting ramps. Roadway widening up to 8 feet (within the current ROW) would be required in some locations to accommodate three new merge lane locations, an additional 12-foot weave lane at ingress/egress locations, and to improve stopping sight distances at curves. The bridge at Central Avenue would need to be reprofiled to maintain vertical clearance for vehicles, while the sidewalk would be upgraded to ADA compliance. Eleven existing ramps, seven interchanges, eleven bridge structures, forty-two retaining walls, and eight sound walls would need to be realigned/widened/converted to accommodate outside widening proposed in this build alternative. The escalated cost estimate for this build alternative is \$473,644,408.21.

The ExpressLane (12 feet), general purpose lanes (12 feet), Auxiliary lanes (12 feet), and Buffers (4 feet) would all be constructed with standard conditions. Non-standard 4-foot inside shoulders and 10-foot outside shoulders, would be implemented where site constraints exist. Where necessary, outside shoulders would be removed to provide full structural sections.

Alternative 3 – Build Alternative: Convert Existing HOV Lane to Two ExpressLanes (Nonstandard Lane and Shoulder Widths) This build alternative would convert the existing bi-directional HOV lane, from Imperial Highway/Sepulveda Boulevard Intersection to Studebaker Road, to an 11-foot ExpressLane in each direction. A second 11-foot ExpressLane in each direction would be added by utilizing non-standard lane and shoulder widths. The ExpressLanes, general purpose lanes, and auxiliary lanes would also be non-standard 11 feet wide, with exception of the outside general-purpose lane that would remain at 12 feet. The buffers would be non-standard 2 feet, the inside shoulder 2-4 feet, but the outside shoulder would be a standard 10 feet design.

Alternative 3 proposes 10 new sound walls to be constructed. The freeway would be restriped within the existing footprint to accommodate the two ExpressLanes with a 1-foot wide buffer separating the ExpressLane from the adjacent general-purpose lane. Dynamic pricing would be

deployed to address existing degradation of the HOV lane. This alternative also proposed improvements to the I-110 corridor to place associated signage.

New Auxiliary Lanes, approximately 1,000 feet in length, are proposed at: Westbound I-105/Northbound I-110 ExpressLanes Connector, Southbound I-110/Eastbound I-105 ExpressLanes Connector, and Southbound I-110/Eastbound I-105 Connector.

Roadway widening up to 25 feet would be needed to accommodate the Alternative 3 ExpressLane configuration, five new merge lane locations, five new/extended auxiliary lanes, an additional 12-foot weave lane at ingress/egress locations, avoid existing maintenance gates to Metro Green Line LRT, and improve stopping sight distances at curves.

Twenty-two existing ramps, seven interchanges, twenty-two bridge structures, seventy-eight retaining walls, and fifteen sound walls would need to be realigned/widened/converted to accommodate outside widening by this build alternative. Central Avenue, Fir Street, Bullis Road, and Harris Avenue would need to be reprofiled to maintain vertical clearance and the sidewalks would be upgraded to ADA compliance. In addition, Imperial Highway would need to be reconstructed between Mona Boulevard and Fernwood Avenue to accommodate the roadway widening. The escalated cost estimate for this build alternative is \$763,430,753.

There are 29 existing California Highway Patrol (CHP) Observation Areas along I-105 within the project limits. Eight additional observation areas have been incorporated into both of the build alternatives to help ensure traffic laws are enforced. A weaving lane between the first general purpose lane and the closest ExpressLane is proposed in each direction at most ingress/egress locations to provide a dedicated lane for speed adjustments between the high speed through traffic in the ExpressLanes and the slower speed of the general purpose lanes during heavily congested peak periods.

The DEIR does not clearly compare the number and locations of the ingress/ egress lanes for the existing HOV lanes or Alternative 2 and Alternative 3. The SBCCOG should request this information be added to the document.

Local Improvements: In both build alternatives, some local streets adjacent and parallel to the I-105 will need to be reconfigured or re-profiled to accommodate relocation of ramps. Local jurisdictions should review the EIR/EA to determine the potential effects and improvements needed as a result of the reconfiguration of lanes.

Because the project is entirely within the limits of the I-105 freeway right of way, the EIR / EA concludes that there is either no impact or less than significant impact in all categories that are required to be evaluated. This project does not change any of the current land uses in the project area with the exception of several construction sites that require Temporary Construction Easements (TCE) or partial acquisition for Alternative 3.

SBCCOG Concerns

When the I-110 ExpressLanes were constructed, Metro committed to comply with state law by allocating surplus net revenue generated by those ExpressLanes towards local improvements in a defined corridor surrounding the I-110 Freeway. As a result, the net project revenues are funding expanded transit and a host of related capital projects on adjacent streets throughout the corridor.

The SBCCOG had expected a similar approach would be used to link the I-105 ExpressLanes to adjacent arterials. In October 2019, following the California Transportation Commission (CTC) September 25, 2019 public hearing on the I-105 ExpressLane Project, SBCCOG sent a letter expressing our concerns with the proposed scope of the I-105 project. During the Metro Staff presentation at the hearing, we learned that the project will require issuance of a significant amount of revenue bonds to be repaid from toll revenues to cover Metro's debt service for the capital costs of the project and that the debt service may equal the entirety of the anticipated net toll revenues.

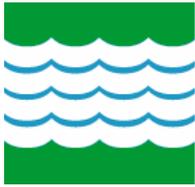
Metro staff, Caltrans, local jurisdictions and the SBCCOG are developing a set of capital projects, known as the Integrated Corridor Management Program, aimed at better integrating the I-105 freeway (including its ExpressLanes) with the adjacent arterials. However, the draft EIR/EA limits the scope of the project to the ExpressLanes and re-configuration of the general-purpose lanes on the freeway deck, with no funding being made available for related roadway and transit projects in adjacent communities,

Limiting the scope allows the EIR/EA to conclude that all of the project evaluation categories result in no impact or less than significant impacts because the project is limited to the current I-105 right of way. The off-freeway elements of the I-105 ExpressLane project have not been integrated into the EIR/EA and no state funding has been committed to ensure that the freeway corridor is properly served by an integrated corridor improvement program that includes the ExpressLanes and related improvements on adjacent streets. In addition, by using all of the bond revenues for on-freeway improvements, there will probably not be any net revenues for off-freeway improvements for thirty years.

Combining these two projects would ensure that adjacent communities receive tangible benefits as soon as the I-105 ExpressLane opens rather than being forced to wait until Metro has paid off the bonds and begins to generate net revenues sufficient to fund related projects.

RECOMMENDATION

That the SBCCOG Board send a comment letter to Caltrans on the I-105 ExpressLane Draft EIR/EA before July 6, 2020 that recommends including appropriate capital improvements on parallel roadways and at ramp intersections in Alternatives 2 and 3 EIR/EA and clearly identifies the existing and new ingress/access points. Additionally, send our letter to the Gateway Cities Council of Governments requesting their support of these concerns.



SOUTH BAY CITIES
COUNCIL OF GOVERNMENTS

2355 Crenshaw Blvd., #125
Torrance, CA 90501
(310) 371-7222
sbccog@southbaycities.org
www.southbaycities.org

June 26, 2020

Ronald Kosinski, Deputy Director
Dawn Kukla, Office Chief
Caltrans District 7
100 S. Main Street, MS – 16A
Los Angeles, CA 90012

SUBJECT: I-105 ExpressLanes Draft EIR/EA Comments

Dear Mr. Kosinski and Ms. Kukla:

The South Bay Cities Council of Governments (SBCCOG) has reviewed the draft EIR for the proposed I-105 ExpressLanes Project and is raising the following concerns that should be addressed in the Final Draft and Response to Comments:

1. When the I-110 ExpressLanes were constructed, Metro committed to comply with state law by allocating surplus net revenue generated by those ExpressLanes towards local improvements in a defined corridor surrounding the I-110 Freeway. As a result, the net project revenues are funding expanded transit and a host of related capital projects on adjacent streets throughout the corridor.

The SBCCOG had expected a similar approach would be used to link the I-105 ExpressLanes to adjacent arterials. During the Metro Staff presentation at the California Transportation Commission hearing on September 25, 2019, we learned that the project will require issuance of a significant amount of revenue bonds to be repaid from toll revenues to cover Metro's debt service for the capital costs of the project and that the debt service may equal the entirety of the anticipated net toll revenues.

Metro staff, Caltrans, local jurisdictions and the SBCCOG are developing a set of capital projects, known as the Integrated Corridor Management Program, aimed at better integrating the I-105 freeway (including its ExpressLanes) with the adjacent arterials. However, the draft EIR/EA limits the scope of the project to the ExpressLanes and re-configuration of the general-purpose lanes on the freeway deck, with no funding being made available for related roadway and transit projects in adjacent communities.

The off-freeway elements of the I-105 ExpressLane project have not been integrated into the EIR/EA and no state funding has been committed to ensure that the freeway corridor is properly served by an integrated corridor improvement program that includes the ExpressLanes and related improvements on adjacent streets. In addition, by using all of the bond revenues for on-freeway improvements, there will probably not be any net

LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

revenues for off-freeway improvements until the bonds are paid off, some thirty years in the future.

We oppose the segmentation of the two project elements and believe that it will result in cumulative impacts that should be explicitly addressed in the DEIR/EA. Limiting the scope allows Caltrans to conclude that all EIR/EA project evaluation categories result in no impact or less than significant impacts because the project is limited to the current I-105 right of way. This could lead to significant unintended consequences if not addressed now. Combining these two projects would ensure that adjacent communities receive tangible benefits as soon as the I-105 ExpressLane opens rather than being forced to wait until Metro has paid off the bonds and begins to generate net revenues sufficient to fund related projects.

In a letter sent October, 2019, the SBCCOG expressed our concern that the off freeway elements defined in the Integrated Corridor Management Program be part of the project. Once again, SBCCOG requests that the EIR/EA address the cumulative impacts of limiting the project scope to the freeway and not addressing the adjacent roadways. SBCCOG also requests that the EIR/EA include suitable mitigations within the project for off freeway impacts and that there be consideration to scoping the project and size of the bond issuance to include those elements.

2. The DEIR/EA needs to provide additional clarity on the tolling and operating rules/assumptions that were used for the ridership and revenue analyses and for the concept of operations. For example, what vehicle occupancy requirements will be used to determine waiver of a toll? Will 2+ occupancy exempt the vehicle from tolls or will the minimum threshold for exemption be 2+ during off-peak and 3+ (or more) during peak periods? Or something else? Will dynamic tolling be activated 24 hours, 7 days per week and on holidays? Will zero emission vehicles be allowed to use the ExpressLane without tolls or at a discounted toll? If there are tolls for single occupant zero emission vehicles, will they be collected at any time or will single occupant zero emission vehicles be limited to off-peak hours?
3. SBCCOG wants to ensure that there are sufficient access/egress locations for the ExpressLanes on the I-105 freeway. We cannot determine the number and location of the proposed lane access/egress locations and weaving lane distances for each location in the draft EIR/EA. Although the DEIR/EA states that there would be three more access/egress locations in Alternative 2 and 5 more locations in Alternative 3, we could not find a map or drawing of the conceptual locations and weaving lane lengths for each of the ExpressLane locations in Alternative 2 and Alternative 3.

The DEIR/EA needs to clearly describe the current HOV access/egress locations in both eastbound and westbound directions and the proposed ExpressLane locations in Alternative 2 and Alternative 3.

4. The DEIR notes that there would be 37 CHP observation areas within the project but the location of the areas is not mapped for either Alternative 2 or 3. The DEIR should include a map of the proposed locations.

Thank you for providing an opportunity to comment on this DEIR/EA. We look forward to working with Caltrans and Metro as the project is developed in conjunction with the related streets that are described in the Integrated Corridor Management Plan.

With gratitude,

Christian Horvath, Chair
South Bay Cities Council of Governments

c.c.: Shahrzad Amiri, L. A. Metro
Jacki Bacharach, SBCCOG
Nancy Pfeffer, Gateway COG
Corridor Cities (list them)