

May 15, 2011

Sheryl M. Garcia  
California Department of Transportation  
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Oakland, CA 94612

re: “Revised and Re-Circulated” Draft EIR on I-280/880/17/Stevens Creek Interchange

Dear Ms. Garcia,

Thank you for sending me the CD with the “Revised and Re-Circulated” Draft EIR on the “Improvements at SR-17/I-280/I-880 Interchange and I-880/Stevens Creek Boulevard Interchange”. I have updated my comments of Dec. 29, 2010, to reflect the change in scope – the removal of the consideration of a Winchester off-ramp, and to include some additional concerns and recommendations.

Speaking as an individual who has lived with the 280/880 mess for several decades now, I say “thank you!” and also “it’s about time!”

The 280/880/17/Stevens Creek interchange in central San José has long been in need of improvement. North-bound (NB) I-280 is *seven*(!) lanes wide at that point: the leftmost one is a carpool lane, lanes 2 and 3 are through-traffic northbound, lane 4 basically dead-ends shortly, lane 5 now goes to both NB I-880 and Stevens Creek Blvd., and lanes 6 and 7 connect to SB-17 (the continuation of SB I-880). As your traffic analysis has shown, the main problem is that traffic to the Westfield Valley Fair and Santana Row shopping centers backs up Stevens Creek, which backs up onto the exit ramp, which in turn backs up lane 5 of NB I-280, sometimes for a mile or more. This creates a very hazardous situation: traffic on the freeway is at a standstill while traffic is whizzing by at 60+ mph on either side. Additionally, drivers entering NB 280 from Bascom/Leigh have to cross through the stopped traffic to enter the main roadway, and also some drivers wishing to go to NB 880 or Stevens Creek are unaware that they need to be in lane 5 and end up stopping lane 4 while trying to squeeze in.

The proposal to create a new off-ramp to NB 880 from the SB-17 flyover, basically making lane 7 go directly to NB 880, will separate the freeway-to-freeway traffic from the local shopping center traffic.

The proposal to replace the 50-year-old cloverleaf at Stevens Creek with a modified diamond with a generous amount of stacking room should help with the backup on NB-280.

And I like the proposal to have a direct connection from SB 880 to NB Monroe: this will allow some drivers to Valley Fair to avoid the congested intersection at Stevens Creek.

My main concern is that the study area did not extend far enough eastward, and that the on-ramp from Bascom/Leland to NB-280 wasn’t considered in this draft EIR. As can be seen in Fig. 1, the Bascom/Leland on-ramp doesn’t really “merge” with the main NB-280 traffic, but

rather exists as the 7th lane of the freeway for only about an eighth of a mile before peeling off to become SB-17. This has always been a “challenging” on-ramp to use, since if one didn’t want to go to SB-17, one had to get up to freeway speeds and cross lane 6 (also going to SB-17), lane-5 (to Stevens Creek and NB-880), and get into lane-4 (which then finally merges into the main NB-280 traffic). While tricky, this has been doable since the traffic exiting NB-280 didn’t really care if they were in lane-6 or lane-7 (they both went the same way), and the on-ramp users had “only” to cross one lane of exiting traffic at a time.

If the proposed direct-connection ramp from NB-280 to NB-880 is built as planned, then the NB-280 lane-7 becomes the exit-only lane to NB-880 and lane-6 becomes the exit-only lane to SB-17. Travelers on NB-280 wanting to go to NB-880 will have to cross over to lane-7 in that short 1/8 mile section where it exists: they can’t preposition themselves well in advance in the proper lane as they can now. And travelers from Bascom/Leland will now have cross exiting traffic for both SB-17 *and* NB-880 at once, effectively weaving across twice as much traffic.

The Bascom/Leland on-ramp to NB-280 is important and serves a large area (the Burbank and Buena Vista neighborhoods) as well as a large traffic generator (San José City College) and a major arterial (Bascom Avenue) – see Fig. 2. The ramp is quite close to the next ramp upstream at Menker, which also is quite well-used, serving Willow Glen (Lincoln Ave.) and Mid-Town (SB Meridian). However, it is not practical to simply close the Bascom/Leland on-ramp and use the nearby Menker on-ramp since there is no access across I-280 to get to it. (For example, NB traffic from City College would have to get onto SB-280, loop off onto NB Meridian and then immediately loop again to go NB on 280.)

Perhaps a solution might be to close both the Leland and Menker on-ramps and to construct a single on-ramp midway between them from Leigh. The advantage would be that it would provide an additional three blocks of merge/weave space; the disadvantages include the cost of reconstruction, the added travel distance for the Bascom users, and the heavier traffic on the combined on-ramp.

#### Other comments:

(1) As I said at the Dec. 8th meeting, I recommend widening the SB-880→280 exit ramp to two lanes (in red on Fig. 3). There is adequate clearance under the existing bridges: it just needs a little pavement and some striping. This exit ramp serves both NB 280 and SB 280. Sometimes one or the other directions on 280 will back up, and then the single-lane SB 880 exit ramp also backs up, preventing drivers going in the other direction from reaching the uncongested side of 280. If the exit ramp were widened, then drivers could access the uncongested direction on the freeway, even while traffic is backed up in the other lane trying to access the backed-up direction.

(2) At the Dec. 8th hearing, others asked about Stevens Creek to NB-280 access: I think that would be a great idea! As shown in blue on Fig. 3, this might be accomplished in a couple different ways:

(A) from the left side of the on-ramp, with a short diagonal over to the SB exit ramp (before the NB/SB split), or

(B) from the right side of the on-ramp: a short diagonal to the NB-280 ramp after the split.

In reading the “Revised and Re-Circulated Draft Environmental Impact Report / Environmental Assessment” on the CD I was sent, it appears that you may have considered the latter (Option 30 in Table 5) and determined that it would be necessary to acquire properties and to shift Daniel Way. However, would this be needed if the ramp to NB-280 were to take off from the left lane of the Stevens Creek on-ramp? And, regarding the extra traffic on the on-ramp: the traffic will be getting onto NB 280 somewhere anyhow: if not here, then it will go on Stevens Creek (in front of Valley Fair and Santa Row), turn left (south) on Winchester, and then get on NB-280. It would seem better to get the traffic off local streets as early as practical.

(3) I would like to ask about the possibility of a direct SB-280-to-Stevens Creek ramp. Presently, traffic from SB-280 to Valley Fair has to exit at Winchester with a left turn on Moorpark, another left on Winchester, go past the side of Santana Row and the movie theaters on Winchester, and then finally turn right on Stevens Creek. I wonder if it might be possible to have a direct SB-280 exit, as shown in hot-pink in Fig. 3: split off just past the SB-280→NB-880 flyover and then ramp down the embankment to the new Stevens Creek stacking lanes, while the new NB-280→NB-880 ramp passes overhead. It may be tricky to get adequate overhead clearance, but, if such a connection could be constructed, it would really help to get traffic around the congested Winchester/Stevens Creek intersection.

(4) Finally, while it may now be outside the scope of the “revised and re-circulated” EIR, I would like to address improving bicycle access in the vicinity. My family and I routinely bike to Valley Fair, in large part because of traffic congestion on I-280 (!) and also because it is so challenging to find parking at the centers – and we do come back with purchases: bungeed to the racks or carried in sacks. (We even bought a sofa by bike: it had to be retrieved from the warehouse the next day anyway, and so our being on bike didn’t impact the purchasing.) At the Dec. 8th hearing, after expressing my appreciation, I also suggested that CalTrans work on the design with the bicycling community. I’m afraid that CalTrans has in the past shown that it doesn’t always understand bicycling issues, as illustrated by the multiple hazards in the existing bike access route (see Fig. 4). Some of the hazards could easily be remedied, and I hope they might be included as part of this project.

I would welcome the opportunity to discuss these thoughts in more detail: please email me at [Larry@L-Ames.com](mailto:Larry@L-Ames.com) or call 480/742-1798.

Thank you,

// signed //

Lawrence Lowell Ames

cc: Councilmember Pierluigi Oliverio, San José Dist. 6  
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