

California Department of Transportation

DISTRICT 4
P.O. BOX 23660, MS-1A | OAKLAND, CA 94623-0660
www.dot.ca.gov



July 20, 2021

SCH #: 2020090519
GTS #: 04-MULT-2020-00256
GTS ID: 20683

Adam Noelting, Principal Planner
Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA, 94105

Re: Draft Environmental Impact Report (DEIR), Draft Plan Bay Area (PBA) 2050 Plan (Plan) and Draft Transportation Project List (List)

Dear Adam Noelting:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the PBA 2050 DEIR, Plan and List. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, equitable, integrated and efficient transportation system. The following comments are based on our review of the June 2021 DEIR, Plan and List.

DEIR Comments

Caltrans commends MTC/ABAG for integrating the Notice of Preparation (NOP) comments and recommendations into the DEIR and Plan, as well as hosting stakeholder and partner workshops as a venue to facilitate early and ongoing coordination. Caltrans continues to encourage MTC/ABAG to attain consistency with the goals and objectives of State Plans listed in the NOP, including the California Transportation Plan (CTP) 2050 ([link](#)). In an effort to recognize consistency with this State plan, Caltrans recommends that the DEIR integrate and acknowledge the following statement:

"CTP 2050 defines performance-based goals, policies, and strategies to achieve our collective vision and recommendations for California's future, statewide, integrated, multimodal transportation system over the next 25 years. This system must reduce greenhouse gas (GHG) emissions 80 percent below the 1990 levels by 2050 as

"Provide a safe and reliable transportation network that serves all people and respects the environment"

described by Assembly Bill (AB) 32 and Executive Order S-03-05. CTP 2050 demonstrates how major metropolitan areas, rural areas, and state agencies can coordinate planning efforts to achieve critical statewide goals, and should be aligned with when developing regional transportation plan goals, policies, and strategies."

Travel Demand Analysis/ Vehicle Miles Traveled (VMT)

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements by supporting local partner agencies to develop VMT-reducing opportunities. Additionally, Caltrans is exploring the feasibility of VMT banks, fees and exchanges to mitigate for transportation impacts under CEQA Guidelines Section 15064.3(b) for capacity-increasing projects on the State Transportation Network (STN) and for land use projects in partnership with other agencies and academic institutions.

Caltrans supports MTC/ABAG's commitment through Mitigation Measure TRA-2a, which states that MTC will collaborate with other agencies to explore the feasibility of programs for reducing VMT such as VMT fees, banks and exchanges. Caltrans welcomes this approach and encourages MTC to continue participation in the regional SB 743 Working Group and other regional partnerships that focus on reducing GHG emissions.

Multimodal Transportation

To reach the Plan's goals, measures focused on increasing multimodal options along the STN, including efforts to convert highway shoulders to devoted bus lanes, should be evaluated on a regional context and with safety as a priority. The cumulative impacts of each of these various efforts should be evaluated to ensure that other priorities, such as highway safety, are not negatively impacted.

Figure 3.15-3: Bicycle Facilities. This figure does not illustrate all bicycle facilities within the Bay Area. Caltrans recommends that this figure be retitled to Regional Bike Network. Additionally, deficiencies and improvements to the regional bike network should be recognized and referred to through partner agency resources, including the Caltrans D4 Bike Plan ([link](#)).

Passenger Rail Operations

Page 3.15-6, first paragraph. To accurately reflect Amtrak's passenger rail services, please consider replacing the existing paragraph with the following:

"Amtrak provides once-daily long distance passenger rail service to the Bay Area via the Coast Starlight and California Zephyr lines, connecting the region to Southern California, the Pacific Northwest and the Midwest. The two State-supported intercity routes in the region, the Capitol Corridor and the San Joaquins, provide more frequent

regional and interregional service, and provide additional connections to the Central Valley."

Freight Operations

As mentioned in Caltrans' NOP response letter, please consider the California Freight Mobility Plan 2020 ([link](#)) as a resource when discussing the long-term vision for California's freight future. This document serves as a comprehensive plan that governs the immediate and long-range planning activities and capital investments by the State with respect to freight movement.

Additionally, please acknowledge and provide a summary of the Bay Conservation and Development Commission's San Francisco Bay Area Seaport Plan ([link](#)), which includes long-range forecasts for various cargo types including containerized cargo, roll-on/roll-off cargo (formerly classified as "neo-bulk"), dry bulk cargo, break-bulk cargo (not currently handled), and non-petroleum liquid bulk cargo.

Page 3.15-8, Goods Movement. Caltrans appreciates the inclusion of a discussion regarding the importance of goods movement to and from the Bay Area. To further illustrate this point, the DEIR should include a map that shows the numerous seaports, airports, Class I railroads, National Highway Freight System routes, and intermodal rail hubs.

Aesthetics and Visual Resources

Page 3.2-14, Impact AES-2. While this section discusses planting along State scenic highways, it does not discuss guidance for highway planting on other State non-scenic routes. If highway screening is a required element of a development, please include a minimization measure in the Plan that requires highway planting and replacement planting on all routes.

While this section discusses planting as a minimization measure along rural officially-designated scenic routes, please consider including urban scenic routes as well. Caltrans requires replacement planting for roadway projects adjacent to the STN, regardless of scenic designation. Please consider clarifying this section to include similar language.

Page 3.2-18, Mitigation Measure (MM) AES-3. Please include and acknowledge the importance of potential changes to the visual character for urban areas. Scenic vistas in the Plan study area include urban areas with views to San Francisco Bay and other natural and built visual resources. These vistas are equally as important as vistas along rural routes. As well, mitigation measures for urban areas should include highway planting and incorporate aesthetic treatment of structures.

Page 5-12, Aesthetics and Visual Resources. The statement that the impact to scenic resources occurs “at the interface between development and the scenic resources and tend to be localized” does not consider the cumulative loss in scenic vistas from public spaces. Please note that development over time can lead to degradation of scenic vistas and public views, which are scenic resources.

Biological Resources

The STN overlaps numerous protected and sensitive natural resources, as well as threatened and endangered species habitat. Please note in the DEIR that Caltrans continues to seek opportunities to collaborate with partner agencies and jurisdictions to evaluate the effects of transportation projects on wildlife connectivity/sensitive habitats through a more regional context as well as to develop effective mitigation strategies that address any adverse impacts of projects.

Page ES-12, MM AES-4 and page ES-23, BIO-1(a). Please include design solutions that explore alternatives to roadway lighting which also encompass the need for roadway safety. The statement, “Direct luminaries away from habitat and open space areas” as it is currently described is not measurable. Please define measurable impacts. Projects on previously unlit roadways with adjacent sensitive habitat and open space (including sensitive coastal locations) should explore design options that address safety needs without the use of luminaries.

Page ES-31, MM Bio-3(a). Please provide additional information on the statement, “Limit wildland conversions in identified wildlife corridors”, and clarify how the limit will be measured and/or enforced.

Sea Level Rise

Page 3.6-15, State Regulations. Consider including reference to AB 1482, which requires the Strategic Growth Council to update the State’s climate adaptation strategy every three years and requires all State agencies and departments to prepare for climate change impacts.

Page 3.6-31, County Sea Level Rise Programs. Consider including the San Mateo County Sea Level Rise Vulnerability Assessment ([link](#)) and the Marin Bay Waterfront Adaptation and Vulnerability Evaluation ([link](#)) in the list of County Sea Level Rise Programs.

Page 3.9-20, Airport Land Use Commissions and Airport Land Use Compatibility Plans. In a separate section, consider incorporating county-level Local Coastal Program (LCP) Land Use Plans (LUPs) to help State, regional and local agencies improve coordination

to reach multi-benefit adaptation solutions in matters related to, but not limited to, sea level rise, coastal erosion, tidal, and storm surge hazards and concerns.

Cultural Resources

Page 3.7-13, Tribal Cultural Resources and Native American Coordination. Please include comments as to why further outreach was not included after no replies were received. Sending project notification letters and/or holding in-person/virtual Tribal Summits at the National Indian Justice Center may not be sufficient for outreach efforts. Caltrans encourages MTC/ABAG to make multiple attempts through various channels of communication for outreach to Native American Tribes.

In addition to mitigation measures employed to reduce the impact to historical resources (CUL/TCR-1), unique archaeological resources (CUL/TCR-2), disturbance of any human remains (CUL/TCR-3), and Tribal cultural resources (CUL/TCR-4), Caltrans encourages MTC/ABAG to consider the budgeting and hiring of Native American Tribal representative by region.

Hydrology and Water Quality

Section 3.10, Hydrology and Water Quality. Please clearly state the difference between Mitigation Measures and Best Management Practices (BMPs) to ensure that all impacts are fully mitigated. Each hydrological impact states that no mitigation measures are required, while the conclusion of each section mentions that location-specific BMPs will be implemented to ensure impacts are less than significant.

Section 3.10-18: California Department of Transportation National Pollutant Discharge Elimination System (NPDES) Permit. Please remove the reference to the 1999 Permit and instead refer to the current Caltrans NPDES Permit, Order No. 2012-0011-DWQ, including its amendment and effective dates. As well, please note that all Caltrans projects will need to meet the requirements in the Caltrans San Francisco Bay Trash Work Plan to meet San Francisco Bay Regional Water Quality Control Board Cease and Desist (CDO) Order No. R2-2019-0007.

Of special note, any construction projects within Caltrans' Right of Way (ROW) with less than one acre of disturbed soil as defined in Caltrans' Construction General Permit ([link](#)) will need to comply with Caltrans' Project Planning and Design Guide (PPDG, [link](#)) requirement to implement a Water Pollution Control Plan (WPCP). Please see Caltrans' PPDG for more details.

Draft Plan Bay Area 2050 Comments

Caltrans commends MTC/ABAG for the depth of the Plan, which goes beyond the 20-year horizon requirement, as well as for providing detailed illustrations that show how each area of the region is impacted by demographic, equity, and climate trends. Caltrans also commends the investments in rail and transit projects identified in the Plan, which demonstrate a strong vision for connecting the region to the broader megaregion and plans for tying transformative transit and housing development together. The following comments pertain to the Plan:

Page 57, Autonomous Vehicles (AVs). Caltrans appreciates MTC/ABAG's recognition that AVs could fundamentally change the way transportation networks are designed and operated. For Caltrans' perspective on the impacts of AVs toward our climate, air quality land use and equity, please refer to the California Multi-Agency Workgroup on Autonomous Vehicles ([link](#)) as well as the strategies outlined in the CTP 2050 ([link](#)).

Page 70, second paragraph, and Page 73, Map 4.2. Please clarify if the Dumbarton Rail Service and Group Rapid Transit refer to the same proposed project.

Page 98, EN1 Adapt to Sea Level Rise. Caltrans commends the Plan for noting that an estimated \$19 billion for sea-level rise adaptation projects will be needed. However, additional funding will be required to protect the Bay Area's communities and critical infrastructure from the impacts of two feet of sea-level rise. Please note that the Fiscal Year 2021-22 California State Budget is being finalized which could potentially contain approximately \$1.3 billion to \$3.7 billion that will be divided among California's cities, counties, and tribes for climate change adaptation planning and implementation. Caltrans encourages MTC/ABAG to make the necessary adjustments to the financial assumptions in the Plan, should additional funding become available for adaptation projects accordingly.

Draft Transportation Project List Comments

T01 21-T01-003 and T01 21-T01-006: Operate & Maintain the Existing System. Please include pedestrian and bicycle striping improvements, such as bicycle lanes, high visibility crossings and sidewalk/curb improvements for resurfacing included in the State Highway Operations and Protection Program (SHOPP).

T02 21-T02-008: Community-Led Transportation Enhancements in Equity Priority Communities. While the project description includes transit and shared mobility, consider including the potential for other pedestrian and bicycle improvements put forth by the underserved communities themselves, including improved sidewalks, safer pedestrian crossings and bike paths.

T04 21-T04-010: Regional Transit Fare Policy. Please ensure future compatibility with the Statewide California Integrated Travel Program ([link](#)) efforts to integrate a tap-to-pay payment system across the state that includes guidelines and minimum requirements for eligibility verification and General Transit Feed Specification (GTFS) data as well.

T06 21-T06-035: Corridor Improvements & Interchange Improvements for State Route (SR)-37. Caltrans recommends augmenting this strategy to specifically include express bus service along the High-occupancy vehicle (HOV) lanes. For more information, refer to the SR-37 Travel Behavior and Transit Feasibility Study ([link](#)) by North Bay County Transportation Authorities (CTAs) regarding express service along this route as a long term step.

T05 21-T05-012: Per-Mile Tolling. While the PBA 2050 proposes to implement “per-mile tolling on select congested freeways where parallel transit options exist”, Caltrans recommends that MTC/ABAG develop and implement a feasibility study prior to implementation. This study should examine the per-mile tolling strategy for any tolling proposal, including pilot locations/corridors, and specifically assess potential impacts to Native American Tribes. Please note that according to the PBA 2050 Engagement with Native Tribes document, the Native American tribes who participated in the December 2019 Tribal Summit expressed concerns that such a proposal would hinder their ability to improve their economic well-being.

T08 21-T08-060: Complete Streets Network. Please consider including the portions of the California Coastal Trail alongside SR-1. As well, the Napa Vine Trail (SR-29) is another example of a regional car-free project in the process of development.

T09 21-T09-061: Regional Vision Zero Policy through Street Design and Reduced Speeds. Please include pedestrian and bicycle safety improvements as part of the Vision Zero policy strategy. Additionally, this strategy should include considerations for bicycle highways/ superhighways ([link](#)). Regarding highway speed reductions, they may be considered on a case-by-case basis and with the support of studies to understand its impacts on safety, the environment, and other considerations.

T11 21-T11-113: Rail Service Expansion for SMART. This strategy does not include the Sonoma-Marín Area Rail Transit District (SMART) as described in the California State Rail Plan ([link](#)). On the current alignment, the plan and the draft SR-37 Comprehensive Multimodal Corridor Plan (CMCP) recommended to include the SMART Healdsburg and Cloverdale extensions as part of the plan. On the future alignment, it is recommended to include SMART east/west between Novato and Suisun City as well.

T12 21-T12-116: Express Lanes. In addition to the planned express lanes on I-80 in Solano County, this program should include extending the express lane system to connect to the I-80 Corridor Improvement Project in Yolo County. Map 4.1 in the Draft Plan shows that a gap exists north of I-505.

EN08 21-EN08-131: Clean Vehicle Initiatives. Please consider income-based rebate incentives for e-bikes as well.

In addition to the above existing strategies, Caltrans recommends that the following strategy be considered:

Sea Level Rise Adaptation Infrastructure for SR-1. Sea Level Rise Adaptation Infrastructure should include SR-1 in Marin, Sonoma, and San Mateo Counties.

Thank you again for including Caltrans in the review process for PBA 2050. Should you have any questions regarding this letter, please contact Erik Alm of my staff at (510) 715-8654 or erik.alm@dot.ca.gov.

Sincerely,



JEAN C. R. FINNEY
Deputy District Director

c: State Clearinghouse