

# Transportation Solutions Defense and Education Fund

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July 18, 2015  
By E-Mail

Ashley Nguyen  
Metropolitan Transportation Commission  
101 Eighth Street  
Oakland, CA 94607

Re: Comments on Plan Bay Area Amendments Documents

Dear Ms. Nguyen:

The Transportation Solutions Defense and Education Fund is an environmental non-profit advocating the regional planning of transportation, land use and air quality. Due to our base of operations being in Marin, our organization has been especially focused on the upward trend of traffic congestion at the western approach to the Richmond-San Rafael Bridge (Bridge). It is clear that Caltrans and MTC either entirely missed this trend, or ignored it for years, leading to the current crash program to open the third EB lane to traffic.

We have reviewed the documents posted on MTC's website pertaining to the Draft Amendment to Plan Bay Area (2013) to bring the Richmond-San Rafael Bridge Third Lane project into the TIP. We offer these comments:

- MTC Deputy Executive Director Fremier's June 25th presentation to TAM included a reference to a categorical exemption for this project. Given that a CE has been discussed for months, please explain what triggered environmental review, and state whether a CE is being pursued.
- The project description in the Draft Amendment ("Construction of a new third travel lane by converting the existing shoulder of the eastbound direction of I-580 across the lower deck of the Richmond-San Rafael Bridge to a travel lane") is inconsistent with the Project Fact Sheet, which describes a "Peak-Period Use Lane on I-580 Freeway." Please decide whether this is to be a full-time lane or a peak-period lane, and be consistent.
- The Report for TIP Revision 2015-18 asserts a 50%-50% mode share between autos and bike-ped users. This unfairly gives the appearance that the benefits and costs are shared equally between the modes. Please use a consistent methodology to allocate an appropriate share to each mode. Allocated cost or projected person-trips are two methodologies that come to mind.

### Draft Conformity Analysis

- Page 3 offers the one-sentence conclusion that "the project results in negligible changes in the air quality conformity analysis..." Because it is so difficult--or impossible--to actually find the substantiation for that conclusion within this document, please quantify those changes.
- Figure 3 of Appendix C has no content.
- Figure 17 of Appendix C suggests that future RTP alternatives should be constructed using completely different strategies, to enable their comparison and evaluation. The results from these alternatives are so similar that they offer no useful information on how to optimize the RTP's strategy for achieving its goals.

### Draft Addendum

- On page 4, Andersen Drive is misspelled.
- We believe that the congestion described on page 4 is the result not of growth, but of a change in traffic patterns resulting from the opening of the Richmond Parkway, which shifted traffic from the Bay Bridge to the Golden Gate. To competently fulfill their assigned responsibilities, MTC and Caltrans need to have a detailed quantitative handle on these changing traffic patterns.
- Project Element 1 on page 5 should refer to the Main Street on-ramp, not off-ramp. This description entirely misses the proposed conversion of the I-580 road shoulder from the Sir Francis Drake on-ramp to the Bridge approach. We believe this to fully be part of the project.
- Contrary to prior MTC information, the discussion of the pilot project on page 5 states that the peak-period use of the third lane will be permanent ("After 4 years, the third lane on the RSR Bridge may be made permanent, or will return to function as a shoulder during the off-peak hours.") What exactly is being piloted?
- Table 1, the impact table, is unnecessarily confusing and difficult to interpret. Adding a separate column for Yes or No to the right of "Conclusion in DEIR/ FEIR" would be very helpful. It could be labeled "Significant Project Impacts."
- It is misleading to group Impacts 2.2-3(a)&(b) together. 2.2-3(b) needs to be separated so as to avoid the misleading impression that the "No" is meant to cover it.
- The Transportation discussion on page 45 is misleading where it says "Where helpful, 2013 FEIR findings are included in the tables for comparative purposes."<sup>3</sup> FN3: In many instances the findings in the 2013 FEIR are identical to the updated modeling results. 2013 FEIR data is shown in parenthesis where it differs from the revised data." In fact, 2013 FEIR findings are only displayed for percentage calculations. We could find no other instance of a parenthesis in these tables. The reader should be the judge of what is helpful. Comparative data would be helpful for each data point that differs from 2013 findings.
- The non-availability of data makes it impossible to determine whether the project results in induced demand. That was TRANSDEF's only substantive question.

- The discussion of the significant increase in PM<sub>10</sub> emissions was handled so awkwardly that on the first two readings, it appeared that the Project caused the 12% increase. Please change the language to say "The 2013 FEIR found a 12% increase in PM<sub>10</sub>. The addition of the Project does not change that."
- We can find no basis for the 2040 Transportation Emissions Subtotal, 19,912,202, in Table 17. It does not correspond to Table 16. What is the justification for using a different number? The text on page 58 is very vague.
- Figure 2 appears to have been a poster board presentation shrunk down to fit on a page. Its scale makes the lettering and details so small as to be completely illegible. Please provide a figure that is intended to be displayed at a letter-sized scale.

Given the unacceptable level of service conditions in Marin County that are described on page 4 of the Addendum, TAM requested a proposal from MTC/Caltrans for the interim opening of the third lane on the Bridge during the two-year construction period. The thinking was "Why subject our residents to these traffic conditions for that period if traffic can be ameliorated on a temporary basis?" The June 25 presentation by MTC Deputy Executive Director Fremier offered no compelling explanation for why thousands of people need to be inconvenienced for two more years.

It appears that there is a significant misunderstanding as to how an appropriate opportunity cost for not implementing an interim solution is to be calculated. The potential benefit to many thousands of people was ignored, to avoid inconveniencing the painting contractor working on the Bridge, who is occupying its third lane. MTC needs to do a thorough evaluation of the cost of a change order for the staging of the painting contract, and compare it to the travel time savings of large numbers of people.

Issues involving access to I-580 from Western Drive need to be evaluated by determining how to provide the greatest good for the greatest number, along with some form of mitigation for impaired access.

Thank you for this opportunity to comment on the Draft Amendment to Plan Bay Area (2013).

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,  
President

CC: Dianne Steinhauser, TAM  
Randy Iwasaki, CCTA