January 21, 2013

Caltrans District 4
Office of Environmental Analysis MS-8B
Via email to: Valerie-Shearer@dot.ca.gov

Re: Comments on Highway 101 Greenbrae/Twin Cities Corridor Improvement Project

Dear Caltrans:

In my opinion the project as proposed will result in a net loss for pedestrians, bicyclists, and transit riders if it eliminates the existing ped/bicycle over crossing between Redwood Highway and Niven. The improvements the project proposes-- bike lanes on Redwood Highway and Tamal Vista--*should* have been in place long ago. Recognizing that the existing over crossing structure is outdated, seismically unsafe, and just plain creepy - it is still important to preserve this ability to cross 101 for pedestrians and bicyclists.

The correction of these long standing deficits should not excuse the removal of an important connective tissue for bicyclists, pedestrians and transit riders. Moreover, this over crossing only increases in value with the addition of the Cal Park Tunnel path and SMARTin the future. The area needs more connectivity for all transit modes, not less.

Logically, the project should also address the inadequate and unsafe pedestrian, transit and bicycle access at the Tamalpais Drive 101 interchange. It does not make sense for a project of this scope not to address the impediments to non-motorized transportation fat the Tamalpias interchange. People take their life in their hands simply trying to catch the bus there.

Here are more specific comments to areas in the study:

1. Relocation of Bus Stops: The relocation of stops on 101 will favor park and ride transit users over local pedestrians. The study points out that the new stops will be to closer each other, but does not mention the numbers of residents who will need to walk an extra .5 mile to reach a southbound 101 bus stop.
2. The new Wornum interchange will require pedestrians and bicycles to cross multiple lanes of traffic. Even with improved signals, this is intersection will be high auto volume, and difficult for pedestrians and bicyclists.
3. I don't see the project will significantly address traffic congestion on Sir Francis Drake Boulevard.
4. The project does not address sea level rise.

In my view the project has missed an opportunity to re-envision the 101 interchange area as the hub that it is—for people using multiple forms of transportation. Instead, the project serves through traffic on 101, appears to marginalize local traffic and disenfranchises pedestrians, bicyclists, and transit riders.

In addition, a project of this size and girth allowed to go forward without a full EIR flouts environmental law and does not serve local residents.

Sincerely,

Martha Jarocki
129 Greenbrae Boardwalk
Greenbrae, CA 94904
Tel: 415 461 3592

COMMENT CARD

Please submit comments today or mail by February 14, 2013 to:

Caltrans District 4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

Email: valerie_shearer@dot.ca.gov

To learn more about the project and to view the Environmental Document, visit www.tam.ca.gov or http://www.dot.ca.gov/dist4/envdocs.htm

Name: _____Liza Wozniak____ Phone: ___415-927-1359____

Address: _52 Piedmont Rd Larkspur E-mail: _lizahr@gmail.com___

Comments:

I commute to SF using the 24 bus from the bus stop at Lucky Drive. I get on the bus on the southbound side and get off on the northbound side. I use the pedestrian overpass to get back home every evening! Without that overpass, there is no way to cross 101 in the vicinity of the bus stop. The bus commuters will be forced to drive to work, or to walk all the way to Drake or Wornum, dangerous, long walks with no sidewalks or visibility, to cross the highway. Removing the overpass will render the Lucky Drive bus stop useless and greatly inconvenience all of us who use it to commute. Please, do not tear down this criticallly useful overpass!

Please use the reverse side or attach any additional pages

TAM
Transportation Authority of Marin

Caltrans

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Name: Melanie Baeuh Mushet
Phone: 415 453-1015
Address: 55 Meernaa Ave, Tiburon, CA 94930
E-mail: melanie.mushet@gmail

Comments:

The major problem at the Strunbrae interchange is traffic flow from Strunbrae, flooding (which will be getting worse) entering and exiting both North bound & South Bound is hazardous. This does not appear to address these issues and moves the crossing for bikes and pedestrians. Also, the size of the fly over would be extremely unsightly in that area.

Please use the reverse side or attach any additional pages

Comments re: TAM/CalTrans Disrict 4 Hwy. 101/Twin Cities Corridor Project

The presentation on Tuesday, Jan. 29th, 2013 at Redwood High School was ill prepared with faulty sound visual aids and speaker clarity. Also, the project was exclusive of Marin County resident values of transportation means –ease and safety of walking, cycling, accessing mass transit, both bus and ferry minimizing adverse environmental impacts of noise, air and soil/water pollution. Comments made by residents and business officials should be seriously included in the project design and a thorough EIR completed with factual, accurate data to accommodate needs of the communities and not just CalTrans input. The cost is also prohibitive for the design which does not minimize the traffic problems.

It seems this structure just changes the traffic for people going up north and nothing for those of us who live within the view and sound of the hideous structure of cement. In fact, to take a GG bus, we who use it on the east side of freeway, would have to walk a ½ mile now instead of just a few blocks. The overcrossing gone would keep us apart from the west side of freeway.

What if we just concentrated on a small bridge over the Corte Madera Creek for in town traffic so there would be no need to use the 101 freeway. Also keep those going to San Rafael Richmond Bridge on 101 to San Rafael not use the Sir Francis Drake road at all. This would alleviate so many non-resident cars and keep them headed out of town.

Keep things as they are, but use better signage and barriers to keep traffic apart. Keeping to the posted, 55 mph or less speed limits might also help and better policing on the freeway, would help immensely. Collection of all these traffic fines should help pay for these modifications.

Thanks,

Donald Brecker and Ann Darling Greenbrae residents since 1983

solodarling@yahoo.com

Caltrans District 4
Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

Jana Haehl
499 Corte Madera Avenue
Corte Madera CA 94925

February 8, 2013

Dear Ms. Shearer:

These comments apply to the **Highway 101 Greenbrae/Twin Cities Corridor Improvements Draft Environmental Document**. Please acknowledge receipt of this comment letter to confirm that it is included in the public comment process.

I am a former Mayor of Corte Madera, a founding director of the Corte Madera Community Foundation, a former Chair of Marin LAFCO, and a retired Special Assistant on the staff of Senator Barbara Boxer, as well as a fifty-year resident of Corte Madera and currently active in several local civic organizations.

The project will result in significant environmental impacts, which cannot be mitigated. The Draft Environmental Document (DED) is not appropriate. A full Environmental Impact Report (EIR) is required by law and must be done. The DED has the following significant deficiencies:

1. The DED is inadequate. The DED lacks any significant analysis of compliance with the Town of Corte Madera General Plan, the City of Larkspur General Plan and the Marin Countywide Plan. For example, the Corte Madera General Plan places a high value on maintaining small-town character, which will be adversely impacted by the massive, highly urban concrete structures in this project. The project will destroy the community cohesiveness that has been achieved by decades of effort to bring the two sides of town together as one community. This adverse impact cannot be mitigated.

2. The Corte Madera General Plan specifically states:
"Corte Madera has some of the most beautiful and captivating views of any Bay Area community. With a backdrop of Mount Tamalpais to the west, with San Francisco Bay in the foreground to the east, and with its rolling hills and natural ecological systems at various points in-between, view preservation is a very important community amenity."
This project is incompatible with view preservation and maintaining the scenic character of the community. The DED ignores the project's adverse impact on scenic vistas from both the motorists' perspective and the residents' perspective, which cannot be mitigated.

3. The proposed flyovers and retaining walls will create substantial visual intrusions on the existing scenic townscape that will be visible from most parts of Corte Madera, Larkspur, and Greenbrae. The massive concrete structures will also become a dominant landscape feature when seen from the many walking and cycling paths and trails on the hillsides and baylands, as well as from homes whose value is related to the sweeping scenic vistas they currently have. Public comment at recent hearings is virtually unanimous in condemning this adverse impact, which cannot be mitigated.

4. The elevated concrete structures proposed will create significant noise that will be detrimental to residents of the area, within surrounding flatlands as well as in hillside neighborhoods. Sound measurements listed in the DED do not represent the effect of noise bounce-back from high retaining walls or reverberating from the flyover, where vehicles will be accelerating.

5. Local traffic will be adversely impacted, which will limit local mobility, especially on northbound Tamal Vista between Wornum and Fifer, as well as when drivers seek alternative routes and spill over onto local streets. Assumptions about reduced traffic on Tamal Vista, as described in the DED, are not based on any locally relevant evidence.

6. Bicycle and pedestrian routes will be more dangerous than the existing routes, as the Wornum Interchange will require crossing many new ramp lanes and four signalized intersections close together on Wornum Drive. Pedestrians and bicyclists who use Wornum Drive now to cross from one side of the freeway to the other are unanimous in their beliefs that making this the only crossing will be excessively dangerous for children going to school, for the elderly and handicapped, and for bicyclists of all ages.

7. There is inadequate analysis of impacts related to eliminating the existing Nellen Avenue, which serves as the street frontage and access to several longtime businesses. By dismissing the significance of this adverse impact on these properties and proposing inadequate and impractical mitigation, the DED is deficient.

8. Additional pavement surfaces being created by this project will exacerbate existing flooding problems, and the Fifer area is already three feet below the current FEMA elevation designated for 100-year-floods, which occur every few years. No mitigation is proposed.

9. Virtually no mention is made of the noise impacts produced by pile-driving 240 piles that are 90 feet long and 18 inches to 24 inches in diameter into Corte Madera Creek. During the earlier rebuilding of the Greenbrae Interchange, thuds from pile-driving were heard all over the Lower Ross Valley. Inadequate mitigation is proposed.

10. There is insufficient analysis of the project's impacts in or near Corte Madera Creek, including impacts on sensitive habitat, wildlife, and water quality. Construction activities during the nesting season for endangered species will have impacts that are inadequately evaluated.

This project does not meet its stated goals and the Draft Environmental Document is inadequate due to the following:

11. The project does not increase traffic capacity on Highway 101. Benefits in LOS during commute hours are insignificant, as estimated SB time saved is just 1 minute and 20 seconds.

12. Traffic congestion in the area during the two-hour commute period each weekday morning and evening will not decrease, as severe congestion will still exist on both East and West Sir Francis Drake Boulevard, neither of which are addressed in this project or in the DED.

13. Presently, there are unused ramp meters on the entrance from SFD to northbound 101. It is unclear whether there are any on the southbound entrance or on the other interchanges in the project area. The sole purpose of metering lights is to reduce freeway congestion by reducing the flow of traffic onto the freeway. The inevitable effect of using metering lights on the SFD on-ramps (both north and south) would be to increase congestion on Sir Francis Drake. If metering lights are to be added (as indicated in the DED), then it must be assumed that they will, at some point, be used, and their effect should be studied now.

14. Vehicular safety improvement is not demonstrated, as the existing project area has a below-average collision rate, as illustrated in Table 13 of the Traffic Operations Report, and supported by other documentation.

15. This project fails to comply with Complete Streets concepts, which require transportation projects to serve all users, including cyclists, pedestrians and transit users.

16. There is no evidence presented in the DED that either Golden Gate Transit or Marin Transit will provide bus routes to serve transit riders at the four new bus stops in the Greenbrae Interchange area.

17. There is inadequate analysis in the DED of parking impacts in areas where street-front

parking is being eliminated, and there is no parking or safe drop-area available at several of the new bus stops.

18. Relocation of bus stops will result in a path of travel that will be difficult for the disabled to use, and will require all transit users to walk unreasonably lengthy distances.

19. There is insufficient information in the DED about impacts to the community during the project construction period, which will include numerous and prolonged detours that are confusing to motorists, bicyclists, and pedestrians, and disruptive to the community.

20. The DED contains outdated and exaggerated population and traffic projections that are inconsistent with growth forecasts recently issued by the State Department of Finance.

21. The DED also contains outdated and inaccurate descriptions of current and future development projects in the adjacent communities.

Caltrans needs to change this project.

22. The high level of public opposition to the project expressed at public hearings and in the local media confirms that it would have significant impacts and that it would not meet the needs of expectations of the public. The $143 million cost is often referred to as killing a gnat with sledgehammer.

23. The "No Build" alternative has fewer adverse impacts than the “Build” project.

24. Additional project alternatives that are less massive, less expensive, and less drastic should be considered. Several such alternatives have been suggested by members of the public but have not been acknowledged by the project sponsor (TAM) or the lead agency (Caltrans).

25. Existing safety issues are not serious enough to justify spending $143,000,000 to improve them, and multiple new safety issues will be created by this project.

26. The proposed bicycle routes in the project will diminish the chance to complete the North-South Greenway on the former railroad right-of-way east of Industrial Drive.

The project does not address flooding and future sea level rise, notwithstanding the fact that under current conditions the area already experiences flooding several times a year.

28. Although the Transportation Authority of Marin has publicly indicated that it has $49,000,000 in funding from Regional Measure 2, it appears that Caltrans does not have any funds currently available for this project and will have to either borrow against anticipated gas tax funding or stop work on the project periodically until additional funding is generated. The scope of the project should be reduced to fit currently available funding. Otherwise, adverse impacts on the community will be prolonged and disruptive.

29. The proposed Wornum Interchange will create potentially dangerous conditions for bicyclists and pedestrians, as well as for disabled persons who must use it as the only place to cross from one side of the freeway to the other when the existing pedestrian-bicycle overpass is removed at the beginning of project construction.

30. Congestion on East and West Sir Francis Drake Boulevard must be addressed, particularly as three eastbound lanes leading to Highway 580 and the Richmond-San Rafael Bridge shrink down to one lane, which is what actually causes the backup each weekday afternoon on Highway 101. This problem has been completely ignored in the Build project.

TAM
Transportation Authority of Marin

Caltrans

COMMENT CARD

Please submit comments today or mail by February 14, 2013 to:
Caltrans District 4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

Email: valerie_shearer@dot.ca.gov

To learn more about the project and to view the Environmental Document, visit www.tam.ca.gov or http://www.dot.ca.gov/dist4/envdocs.htm

LAW OFFICES OF
DAVID C. MACPHERSON
145 CORTE MADERA TOWN CENTER, #656
CORTE MADERA, CALIFORNIA 94925-1215

TELEPHONE (415) 924-1235 / FACSIMILE (415) 927-0678 / E-MAIL DCMLAW@PACBELL.NET

My name is David Macpherson. I have lived in Corte Madera for twenty years. I serve on the Bicycle Pedestrian Advisory Committee (BPAC) to the Town of Corte Madera. I am married and have a 6-year old daughter.

My comments are limited to the negative impact on bicycle and pedestrian facilities, *viz.*, those connecting the west side of Highway 101 to the bays side.

My family and all the bicyclists and pedestrians that I know are extremely pleased with the improved facilities on the north and south of Highway 101 in the project scope. Our concerns are:

1. **Wornum Drive.** Pedestrians and bicyclists, particularly children, face too many conflicts with speeding motor vehicles that cross Tamal Vista and the two new proposed intersections at Redwood Highway. No amount of striping or flashing crosswalk lights will properly mitigate the danger inherent in the current design. I would prefer a design that has a path drop under Tama Vista and then drop under Redwood Highway. I envision relatively short ped/bike tunnels with the transit path under the freeway portion being at ground level.

2. **Demolition of Pedestrian Walkway.** This facility needs to be replaced if demolishment cannot be avoided.

3. **Tamalpais Drive / Paradise Freeway Overpass.** Pedestrian and bicycle east/west transit of this facility is *within* the project scope but no improvements appear to be considered. My suggestion that we include wider the bicycle paths as they cross over the freeway; improve the crosswalk where pedestrians are crossing in front of cars entering the freeway heading south; improve the crosswalk where pedestrians are crossing in front of cars exiting the freeway northbound and then turning towards Tamalpais west or Paradise going east; pave the walkway on the south side of the Tamalpais overcrossing that leads to the pedestrian circular ramp; and, improve the lighting and signage for pedestrians using this facility.

Caltrans District 4

Valerie Shearer, Senior Environmental Planner

Office of Environmental Analysis, MS-8B

Dear Ms. Shearer,

I want to start by saying that went to Jan. 29th's public hearing at Redwood High School with an open mind.

I listened intently to the project presentation and the safety issues as they were described and how the proposed changes would improve the situation. It was an impressive presentation and the proposed solutions seemed to address the choke points and merging problems.

I then listened to all of the public comments and realized how the proposal translated to the space in our community. Not well was my conclusion! This is not the right answer for how we want to live.

I was raised in Marin and remember how easy it was to get around by bus with frequent, reliable service and useful routes; I rarely needed a car.

I then lived in Santa Clara County for 20 years with the "glory" of freeways and expressways all around. I sat in horrible traffic for years of my life. I watched towns grow and develop to be more and more car-centric. I watched people move farther and farther away to where they could regain some quality of life. The towns where property values rose were the towns that had said "no" to more freeway access." The town where I lived, Los Gatos, consistently had the highest property values being the properties that could claim "walk to town."

The population has huge obesity problems and people spend most of their free time travelling to other places outside of the county that have retained their "sense of place."

Freeways are not an answer to congestion! Getting people farther and faster is not a desirable goal. Whenever a freeway is improved, it's only a matter of time (usually pretty short) before the road is more congested that was ever anticipated.

This project has all of the problems mentioned in the meeting as well as not being what we as a region need as we face the problems of today and the future.

The pylons on northbound 101 recently installed near Industrial prevent people from making the most dangerous illegal maneuver across multiple lanes onto northbound 101 before Sir Francis Drake Blvd. We should allow people to adapt to this change long enough to get an accurate measure of its effectiveness.

We should also implement many of the multi-modal improvements outlined in the project for pedestrians, cyclists and public transit. (They should not be tied to a massive overpass/flyover project but independent of them.) Clearly the money and will is there for these improvements.

I strongly agree with the gentleman that made the point that when San Francisco removed freeways they saw a return to vitality in areas that had become dead zones in the city.

I realize that a committee will be reviewing alternatives. I urge them to consider an alternative that improves only non-car traffic.

Sincerely,

Jill Templeton

275 E. Strawberry Drive

Mill Valley, CA 94941

Cheryl Longinotti, PhD
8 Tamal Vista Blvd
Corte Madera, CA 94925

Caltrans District 4
Valerie Shearer, senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660
valerie_shearer@dot.ca.gov

February 12, 2013

Dear Ms. Shearer:

These comments apply to the **Highway 101 Greenbrae Corridor Improvement Draft Environmental Document.** Please acknowledge receipt via cslonginotti@comcast.net to confirm that it is included in the public record.

I am certified by the League of American Bicyclists to teach bicycle handling and road safety skills (LCI #2334). The League, founded in 1880, offers the only nationwide bicycling instructor certification program. I confine my comments to bicycle and pedestrian issues.

Based on assumptions without documentation or evidence, the Draft Environmental Document (DED) makes multiple assertions as to the absence of environmental effects.

1. The DED asserts that community cohesion will be improved through the installation of bicycle and ADA-complaint pedestrian improvements.

2. The DED asserts that proposed pedestrian and bicycle facilities will enhance the connectivity of the bicycle and pedestrian network in the area.

3. The DED asserts that removal of the existing pedestrian over-crossing at Nellen Avenue in combination with the proposed pedestrian and bicycle facilities will provide improved access to transit and recreational areas and regional trails.

4. The DED declares the realignment of the Bay Trail minimal or de minimis.

5. The DED considers the Build Alternative's pedestrian facilities a benefit to disadvantaged residents and communities.

All of the above assertions are based on the presumption that the reconfigured Wornum-101-Redwood Hwy junction will provide objectively and subjectively safe and convenient passage for those on foot and on bikes and that such persons will utilize this route. No data are given to support this presumption although multi-modal level of

service instruments are available. Moreover, numerous members of the community, including the Marin County Bicycle Coalition, have stated that the reconfigured Wornum junction would be unacceptably dangerous, and the design includes features which are known to decrease level of service and increase risk for those on foot or on a bicycle.

The DED does not adequately address other specific environmental impacts.
6. The DED does not adequately address the project's impact on local traffic. The 2014 opening of a new elementary school in bayside Corte Madera and the addition of school students living at the 195-205 Tamal Vista development will increase crossings of 101 to get to and from school.

7. The DED does not address the impact of trees and shrubs not in the CalTrans right-of-way but causing damage and maintenance issues for project facilities. Specifically, roots on the south-side of Wornum have damaged the existing path surface and made it unridable. How will the project minimize future maintenance costs while maintaining the integrity of the site?

8. The DED asserts consistency with local Plans but selectively refers to their provisions. Principle themes articulated in Corte Madera's 2008 General Plan are:
"*Identity* Corte Madera is committed to maintaining and enhancing its identity as a small community in a cosmopolitan setting" and "*Community-Building* The General Plan provides an opportunity to enhance the 'livability' of the community and to improve physical connectivity between the east and west sides of Town." Circulation goals and policies are even more explicit:
"GOAL CIR-2: A circulation system that safely and effectively links the east and west sides of Corte Madera."
"POLICY CIR-2.1: Prioritize options for improving bicycle and pedestrian access across Highway 101."

The elevated concrete structures and massive retaining walls will create adverse impacts on community character, and the redesign of Wornum-101-Redwood Hwy will directly impair connectivity between east and west sides of Corte Madera.

9. Relative to existing conditions, this project degrades bicycle and pedestrian travel through the Wornum, and as such, it does does not meet FHWA regulations for "full consideration to the safe accommodation of pedestrians and bicyclists during the development of federal-aid highway projects" (23 CFR 652).

10. This project should not be built unless and until it includes a safe and separated bicycle and pedestrian crossing of 101, preferably at Wornum, where Marin County Bicycle Routes 5, 16 and 17 meet.

Cheryl Longinotti, PhD

COMMENT CARD

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Caltrans District 4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
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To learn more about the project and to view the Environmental Document, visit www.tam.ca.gov or http://www.dot.ca.gov/dist4/envdocs.htm

Name: Holly Henry Makar

Phone: (415) 305-4326

Address: 6221 Buena Ventura
Oakland CA 94605

E-mail: hollyaurora@gmail.com

Comments:

I am not a resident of Marin County, but I drive into Mill Valley for work every weekeday. I heard about the Greebrae Interchange Project and was excited at the prospect of a solution to the traffic congestion I deal with daily trying to get on & off Sir Francis Drake Blvd. Looking at the material online about the project & the draft environ-mental document, I don't really see the named goal being achieved. Two lanes are definitely needed from Sir Francis onto Hwy 101 SB & 2 lanes are needed to get back on to Sir Francis from 101 NB - the proposed flyovers are huge single

Please use the reverse side or attach any additional pages

lanes dumping onto & off of the freeway. It is clear they allow traffic to accelerate to the speed of current highway traffic upon entry, but this alone won't address the volume. Also, the re-entry onto Sir Francis by NB 101 traffic doesn't a address widening Sir Francis itself btw 101 & 580. The back-up here can take 30-45 mins to get through at rush hour. What I see in this plan appears to modernize traffic flow without really allowing for greater volume to pass thru.

A solution is needed, but this doesn't really seem to be it. Also, environmental impact doesn't seem to be adequately addressed, considering there would be concrete pylons going into sensitive marshland here, why isn't there more of a plan in place as to how care would be taken not to disturb nesting places of the many species of birds or deal with the runoff from construction materials while work is in progress? I can't believe local residents won't demand more care be taken in this regard.

While I am hopeful that a good plan will be on slate sooner rather than later, I would rather wait for a better plan. This one looks like it costs a lot of money & misses the point entirely.

Commuter from Oakland to Mill Valley for 7 years, with likely many more years to come. Thank you for your time.

Holly

Victoria Newton
8 Tamal Vista Blvd.
Corte Madera, CA 94925

Caltrans District 4
Attn: Valerie Shearer
Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

February 10, 2013

Dear Ms Shearer:

Please acknowledge receipt of this comment letter to confirm that it is included in the public comment process.

I am writing because Caltrans needs to change the Highway 101 Greenbrae/Twin Cities Improvements Project or not do it at all. There are MANY reasons for this, and I will name several important ones below.

First, the project will result in significant environmental impacts which cannot be mitigated. The current Negative Declaration is incomplete and a FULL environmental impact report (EIR) must be done as REQUIRED by law because the current one:

1. Does not adequately address projected sea level rise or how much the additional pavement will exacerbate existing flooding problems.

2. Does not address the increase in the significant amount of noise that the flyovers and extra concrete will generate which will be detrimental to residents and wildlife living in the marshlands.

3. Does not adequately comply with Complete Streets concepts, which require transportation projects TO SERVE ALL USERS, including bicycle riders, pedestrians, the disabled, and transit users.

4. Does not adequately analyze the impacts in or near Corte Madera Creek, including impacts on sensitive habitat, wildlife, and water quality.

5. Does not analyze adequately the visual impacts on the adjacent communities.

6. Does not adequately analyze the impacts to the community during the project construction period such as loud pile driving through some 75 to 90 feet of bay mud or numerous and prolonged traffic detours.

7. Does not adequately analyze the future growth of the adjacent area. There is inadequate analysis of population and traffic projections which are outdated and inconsistent, especially in regard to recent forecasts issued by the State Department of Finance.

In addition, I have attended every meeting where public comments were entertained by TAM, and I have heard NONE in favor or support of the current plan. I am one of those who do not support the plan in its current form. This is a very costly venture and definitely needs to be carefully planned and rethought taking into better account the impact on the nearby communities .

Sincerely,

Victoria Newton

Victoria Newton

ATTORNEYS AT LAW
Stafford W. Keegin
Robert L. Harrison
Jeffrey S. Schoppert
Paul C. Smith
Jessica Karner
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Deborah Miller Black
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Damon M. Connolly
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Derek A. Weller

February 12, 2013

Sent via email: valerie_shearer@dot.ca.gov
and U.S. Mail

Caltrans District 4
Office of Environmental Analysis, MS-8B
PO Box 23660
Oakland, CA 94623-0660

Attention: Valerie Shearer
Senior Environmental Planner

Re: Highway 101 Greenbrae/Twin Cities Corridor Improvements
Draft Environmental Document

Dear Ms. Shearer:

We represent Jackovics Enterprises Inc. and the Jackovics' family (collectively "Jackovics"), with regard to the above-referenced project. Attached is a letter from land use consultant Scott Hochstrasser of IPA, Inc. providing, on behalf of Jackovics, formal written comments on the Draft Environmental Document ("DED").

We have carefully reviewed the DED and, on behalf of Jackovics, conclude that the current draft mitigated negative declaration fails to comply with the most basic and fundamental provisions and purposes of the California Environmental Quality Act ("CEQA") in that: (1) it fails to recognize and understates the significant environmental impacts of the project, including but not limited to those related to traffic circulation on local surface streets; and, (2) it incorporates and relies upon significantly flawed technical analysis. The catastrophically flawed traffic safety analysis alone effectively precludes the public from meaningfully commenting on the true impacts of the project, thereby rendering the DED non-

compliant with CEQA. Further, given the inability to properly disclose and analyze the obvious significant potential impacts of the project in the current draft mitigated negative declaration, CEQA requires preparation and circulation of a full environmental impact report ("EIR:).

More specifically regarding the traffic safety analysis:

1. The traffic analysis references 10 years of data in order to overstate adverse traffic conditions relative to those reflected in the three-year, 2007-2009, data, as the three year data does not appear to support a conclusion of increasing traffic safety hazard.

2. It appears that the project study area was inexplicably increased to mile marker 7 to 9 in order to again overstate the traffic congestion and accident data, as compared with the mile marker 7.2 to 8.9 project area referenced in the DED. Interestingly, the only two fatal accidents occurred outside the true DED project area but within the expanded area analyzed and, even though both accidents were caused by matters unrelated to traffic conditions, they were incorporated into the study to improperly overstate traffic safety conditions.

3. It appears that the traffic accident analysis also included a substantial number of accidents that occurred outside of the true project study area and, in fact, outside of Marin County, again overstating the actual traffic safety conditions in the project area.

The above are but a few examples of the flawed traffic analysis which reflects either consultant and staff negligence in performance and inclusion of the studies, or an intentional effort to distort the traffic data to support a "need" for a large, unpopular and expensive project otherwise unsupported by the actual facts. The DED clearly and improperly overstates project traffic conditions while failing to properly analyze other significant potential impacts, such as local surface street traffic circulation, thereby rendering the entire current process non-compliant with CEQA. The current DED and review process fails to comply with the most fundamental notice provisions and purposes of CEQA and precludes the public from providing meaningful comment.

We respectfully request that the DED be returned to the drawing board for further study and analysis to allow the public to meaningfully comment on an environmental document that meets the requirements of CEQA. A draft mitigated

negative declaration is insufficient to properly analyze and disclose the project's significant potential impacts and to allow for consideration of potentially environmentally superior alternatives. Simply put, the project warrants a full EIR, including an analysis of project alternatives to give the public the meaningful opportunity to have input consistent with the fundamental purposes of CEQA. Failure to perform a full project EIR will undoubtedly result in protracted CEQA litigation.

Respectfully,

Paul C. Smith

PCS/slm
Enclosure

Cc: Jackovics Enterprises Inc.
IPA, Inc.

Scott L. Hochstrasser

IPA, Inc

E-Mail slh1ipa@aol.com
42 Glen Drive, Suite B * Fairfax, CA 94930 USA * Tele (415)459-6224 * Fax 459-5810

VIA EMAIL and U.S. POSTAL SERVICE February 11, 2013

c/o Paul C. Smith, Legal Counsel for Jackovics Family
Keegin Harrison | Schoppert Smith & Karner LLP
1000 Fourth Street, Suite 600
San Rafael, CA 94901
www.keeginharrison.com

For Delivery To:

Caltrans District #4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660
VIA EMAIL: Valerie_Shearer@dot.ca.gov

RE: JACKOVICS FAMILY COMMENTS
NOTICE OF INTENT TO ADOPT A DRAFT INITIAL STUDY WITH PROPOSED MITIGATED NEGATIVE DECLARATION AND DRAFT ENVIRONMENTAL ASSESSMEMNT FOR THE HIGHWAY 101 GREENBRAE/TWIN CITIES CORRIDOR IMPROVEMENT PROJECT (MARIN COUNTY, TOWN OF CORTE MADERA AND CITY OF LARKSPUR)

Dear Ms. Shearer;

Thank you for the opportunity to review and comment on the above noted environmental documents. The Jackovics' Family, clients of mine, haves spent over 15 years assembling private properties adjacent to and in the immediate vicinity of the Caltrans 101 Greenbrae freeway right of way including the following:

A. #101 Nellen Avenue – APN 024-042-01 – Site Area 30,000 sq ft
B. #110 Nellen Avenue – APN 024-041-12 – Site Area 35,680 sq ft
C. #150 Nellen Avenue – APN 024-041-16 – Site Area 22,500 sq ft
D. #10 Fifer Avenue – APN 024-042-02 – Site Area 44,866 sq ft
E. #200 Nellen Avenue – APN 024-011-57 – Site Area 26,500 sq ft
F. #2 Fifer Avenue – APN o24-041-15 – Site Area 48, 210 sq ft

PLEASE SEE ATTACHED - EXHIBIT A "PROPERTY INFORMATION"

In total the family owns and controls six (6) major properties with a total of over 4.77acres of

developed land. The client's properties include a mix of land uses including offices, commercial gym and retail. Over the past several years various members of the family have participated in several workshops and meetings wherein the Greenbrae 101 interchange project has been discussed. They have provided both oral and written comments on several alternative plans and have continued to have major concerns about alternative designs.

In short summary, the project would include roadway modifications, realignment, additions and removals of on-off ramps, existing pedestrian overcrossing and construction of auxiliary lanes, transit and bicycle lanes that would have potentially significant adverse environmental impacts on existing and future land use of the client's property. Additionally, the need for the improvements and the benefits claimed seem dubious at best, given factual inconsistencies and inaccuracies presented in the traffic impact analysis prepared by the consultants at Circlepoint.

Therefore, based on the following reasons, we contend that the project environmental document is completely inadequate because it misleads the public about the traffic safety issues and circulation needs for the project and the benefits of the project development. Secondly, we contend that the environmental documents are legally inadequate to properly address the potential significant adverse environmental impacts that will result from the development to the selected project alternative and no analysis of a less environmentally damaging project has been provided. Finally, the proposed mitigations are not consistent with standards specified in the California Environmental Quality Act Guidelines Section 15307 Mitigation, some impacts cannot be reduced to "less than significant "and a project Environmental Impact Report is required under CEQA law.

I. HUMAN ENVIRONMENT

Section (2.2.1.1) Issues with No Adverse Impact

Comment: Adverse Impacts will result on existing and future land uses that were not studied.

On Page 2.1-2 "Community Impacts" section notes that the project will involve private properties. Figures, maps and plans in the document show that significant temporary and potentially permanent additional easements and/or new right of way will be required to construct the project. The right of way easements and takes will occur on Jackovics' Family properties. *See Attached Exhibit B "Development Potential"*. Currently the existing Jackovics' Family properties are zoned with a .34 Floor Area Ratio (FAR). Recently the Town of Corte Madera has approved development with FAR up to 1.56 to allow for market rate and affordable housing needed to meet Bay Area regional "fair share" requirements. The Jackovic's Family properties combined could support as much as 200,000 sq ft of housing and retail.

With the proposed project roadway "fly over" and other project elements the site development potential would be reduced to approximately 155,000 sq ft because building area would be reduced and parking on grade would be lost forcing structured parking. The project Initial Study is inadequate because it failed to study potential significant adverse environmental impacts on the Jackovics' Family property including the loss of private land, the loss of the value and potential uses of the remaining Jackovics' Family property. The potential loss of future affordable and market rate housing

development was not studied.

Section 2.2.1.2 Regional Plans

Comment: The proposed project alternative is inconsistent with regional and state plans.

The proposed project could potentially result in a loss of 45,000 sq ft of mixed used development including market rate and affordable housing on the Jackovics' Family property. This loss is inconsistent with California goals and ABAG goals for regional housing growth in Southern Marin County.

Section 2.2.3.1 Relocations and Real Property Acquisitions

Comment: The project will result in relocations and real property acquisitions and there is no mitigation pursuant to CEQA Section 15370.

Section 2.2.3.1 lists property acquisitions for building the alternative including four (4) of the Jackovics Family properties for a total of approximately 14,160 sq ft. (properties 13, 14, 15 and 16 on Table 2.2-6). The study indicates that no significant adverse impacts to the established commercial uses on the subject properties will ultimately result because the final construction will restore access driveways and ingress and egress to existing on-site parking. The study goes on to say parking will be restored in the area yet the plans include removal of existing on-street parking now available on Nellen Avenue (See Document Figure 2.8). The avoidance, minimization and/or mitigation measures provided in the environmental document are non-specific, lack detail and put off details required by CEQA Section 15370 Mitigation. There is no detailed explanation of how the temporary and permanent property "Takes" will be limited and/or what action would specifically be taken to limit the degree or magnitude of the action and its implementation. There is no detailed plan for rectifying the impact, repairing, rehabilitating, or restoring the impacted environment, namely the Jackovics' Family properties. The study lacks details for eliminating the impact over time by preservation or maintenance operations during the life of the action. Finally, there is no discussion of compensation for the impact by replacing or providing substitute land resources. The study fails to address the "take" impacts and the proposed mitigations do not meet the basic standards of CEQA.

Section 2.2.5 Traffic and Transportation

Comment: The project has a potential to result in significant adverse environmental impacts on regional and local traffic that were not studied.

Regional Traffic Issues: This section of the project Initial Study along with the technical traffic studies referenced makes a detailed analysis of the roadway circulation and safety issues that exist now. However, the mile post designations for study areas are internally inconsistent in the CEQA document. What is the study area? The document uses ten years of traffic collision data, San Francisco collision records and the study area is in Marin County, Greenbrae at the HWY 101 interchange. Why is San Francisco collision data used for a Marin County Greenbrae HWY 101 interchange project analysis? The record shows vehicle fatalities information resulting from medical conditions, not vehicle traffic safety, but the CEQA analysts make claims for roadway safety improvements because

inadequate roadways result in fatal collisions. How roadway safety improvements can propose lower fatal vehicle collision rates where the collisions primarily result from medical conditions of drivers?

Finally, the record is replete with evidence that is not relevant to the study area and raises more questions than it answers. The report does not support the conclusions for the project need. Moreover, there is no clear evidence to show that the planned improvements in fact will improve traffic circulation and safety in the area. The data errors, skewing of data, use of data totally irrelevant to the study area results in misleading the public, not informing the public as CEQA guidelines require. The data errors and inconsistencies cloud the "project description" in the CEQA document and distort the reasons presented for why the project alternative was selected and what in fact the purpose, intent, goals and objectives for the project are. The "project description", purpose, goals, intent and objectives need to be re-written. The study area needs to be redefined. The traffic data must be refined to the study area and the errors corrected. At the very least with these changes an entirely new environmental document is needed and a complete re-circulation of the corrected document is required by the CEQA guidelines. Technically a project Environmental Impact is required under CEQA guidelines.

Local Roadway Impacts Ignored: Secondly, the project alternative plan view is "101 highway centric". The environmental document ignores the potential adverse environmental impacts of the interchange improvements on the local roadway, safety, circulation and parking. The study fails to study impacts on local businesses in the area especially the Jackovics' property. Please See Attached Exhibit C "Highway 101 Access Diagrams" and Exhibit D "Sir Francis Drake Blvd Access Diagrams". Exhibit C shows that the existing site conditions allows for 7 driveway access points to Jackovics' Family properties allowing visitors to local businesses convenient access to each of the individual properties. With the proposed "fly-over" two way vehicle access to existing parking would be eliminated at two existing developed properties fronting on Nellen Avenue. In addition to adding inconvenience for local visitors to access on-site parking for existing business, emergency service access and circulation would be adversely impacted. Limiting site access to 3 driveways for 7 businesses has a potential adverse environmental impact that has not been studied. The driveway closures could potentially block emergency service vehicle access and circulation resulting in longer response times for emergency services and inadequate access to buildings for fire protection.

By eliminating the existing Fifer Ave exit south bound HWY 101 travel distance will increase approximately .5 miles. Page 2.2-3.1 of the Initial Study notes that 14,000 vehicles a day enter the Fifer Avenue intersection. Clearly some significant portion of these vehicle trips will be adding .5 mile to their travel distance and the Initial Study failed to account for the additional vehicle miles traveled (VMT) and the potential impacts associated with additional VMT including vehicle circulation, parking congestion and air pollution. Exhibit D shows that the existing site conditions allow for 6 driveway entrances from Sir Francis Drake Blvd, Southbound. With the proposed "fly-over" access from Sir Francis Drake Blvd, Southbound is reduced to three driveway entrances.

The plan would eliminate two way ingress and egress to existing parking at two developed properties on Nellen Ave. There are 58 parking spots that would be lost because 23 are deficient based on a total of 180 existing parking spaces and a need of 145 parking spaces.

The loss of parking will result in public commuter use of private on-site parking restricted for local businesses. There is no impact analysis or mitigation for this impact.

Finally, there is no analysis of impacts that will result on emergency service vehicle access with reduced driveways for private properties. Reduced access points and parking congestion resulting from the loss of 23 on-street parking spaces will result in reduced emergency service vehicle access to existing buildings and established business. No mitigation for this impact has been identified.

In summary the plan to reduce driveways to existing on-site parking on the Jackovics' Family property could potentially adversely impact local traffic circulation and result in parking congestion in the business community. Additionally, the driveway changes will have adverse impacts on emergency service vehicle access to existing established businesses. The planned driveway closures will result in local drivers increasing vehicle miles traveled resulting in additional vehicle circulation, parking congestion and air pollution. Finally, the project Initial Study and proposed Mitigated Negative Declaration are inadequate because none of these potential impacts have been studied.

Section 2.2.6 Visual/Aesthetics

Comment: The project plans are inconsistent with County of Marin, City of Larkspur and Town of Corte Madera General Plans and regulations because the project will have significant adverse environmental impacts on views and aesthetics that will not and cannot be mitigated to "less than significant".

The environmental consultants on page 2.2-61 claim that the study area is a "highly urbanized area". Although it is true that the west side of HWY 101 is build up with back office and retail buildings serving a well developed suburban area; the Town of Corte Madera and City of Larkspur, it is not exactly a highly urbanized area. Moreover, the east side of HWY 101 includes a significant "Park and Open Space" shown on Fig 2-1 of the document. On page 2.2-64 the consultants claim that the View #LF Lucky Drive and Fifer Avenue, overall visual quality is low. The Jackovics' Family properties view today is slightly affected by the existing HWY 101 structure. *(Please See Attached Exhibit F – View Diagram)* This diagram illustrates that the view areas now enjoyed by the existing buildings over the HWY structure are moderate because the structure is 0-5 feet in height. However, with the proposed project "fly-over", depending on the overall height of the structure, the views are potentially adversely affected. The current proposal includes areas of the "fly-over" with an overall height of 48 ft from the existing road grade. As Exhibit F shows the proposed "fly-over" will have an extremely negative effect on the Jackovics' Family properties located on Nellen Avenue. The proposed project will adversely impact views that exist and will constrain views with future development in the future.

Table 2.2-24 lists the Jackovics' properties with an overall visual rating of "low" in three areas: Vividness, Intactness and Unity. The analysis fails to include a cumulative impact analysis of the proposed "fly-over" at various heights. Moreover, there is no evidence to support the consultant's conclusions that overall visual quality is low. The analysis fails to show that the "fly-over" at 48 ft in height will result in a significant adverse environmental impact obstructing views and constraining future development opportunities for views of the park and open space lands on the east side of HWY 101. The visual impact analysis is flawed because it makes false assumptions and conclusions about the baseline environment being "highly urbanized area". It fails to demonstrate openly and inform the public and the property owners about what changes in views can be expected on a cumulative basis. If

the "fly-over" is 48 ft high it has the potential to result in a significant adverse visual impact on the Jackovics' Family properties that has not been disclosed. The project environmental document fails to include any project alternatives that could lower the "fly-over" height and thereby minimize the potential adverse visual impacts.

II. PHYSICAL ENVIRONMENT

Section 2.3.6 Air Quality

Comment: The project will have significant cumulative adverse environmental impacts on air quality that have not been studied and there is no mitigation proposed.

Page 2.3-41 bottom paragraph claims that the proposed project would alleviate traffic congestion, increase overall efficiency and lower vehicle miles traveled. However, there is no evidence to support this claim. In fact, it is anticipated that driveway closures planned for local streets would actually increase VMT by local visitors trying to access existing established businesses. *(See Attached Exhibit C)*. The driveway reductions planned for local surface streets will increase traffic congestion and parking congestion because local business visitors will circulate around the neighborhood looking for access to existing on-site parking. The fact is the project could potentially increase vehicle miles traveled on local streets (Fifer Avenue where 14,000 vehicles a day enter the intersection) thereby increasing daily emissions. The project Initial Study focuses on the Highway 101 (HWY 101) improvements to circulation but ignores the potential impact of the HWY 101 improvements on local street circulation and parking at existing local businesses. The project plan is designed to serve the HWY 101 users at the cost of the users of local streets and the established local businesses. The analysis fails to take in to consideration the potential adverse air quality impacts potentially resulting from additional VMT by locals trying to access existing established businesses and their on-site parking.

Section 2.3.7 Noise

Comment: The project will have significant cumulative adverse environmental impacts on noise that have not been studied and there is no mitigation proposed.

Table 2.3-10 located on page 2.3-50 of the project study fails to list the six (6) Jackovics Family properties as "Noise Sensitive Receivers in the Study Area". The subject properties are clearly noise sensitive receivers. Three of the properties are located directly adjacent to the west side of HWY 101 right of way. *Please See Attached Exhibit E "Traffic Noise Diagrams"*. This diagram illustrates the existing site noise conditions establishing the CEQA baseline. The drawing on the left shows the extent to which the existing traffic noise impacts the existing established land uses. The drawing on the right shows the potential noise impacts on the Jackovics' Family properties with the proposed "fly-over". Clearly by elevating the roadway as planned the noise source is much more efficient at projecting sound into the distance similar to an elevated air raid siren. The drawing shows conclusively that the elevated roadway is significantly louder, at least twice the noise energy or 50% louder than the existing ground level roadway. The project Initial Study is inadequate and fails to address the potential significant adverse noise impacts the "fly-over" design will have on the Jackovics' Family properties.

III. CUMULATIVE

Section 2.5 Cumulative Impacts

Comment: Potential significant cumulative adverse environmental impacts cannot be mitigated and pursuant to CEQA Guidelines a project Environmental Impact Report (EIR) is required.

Page 2.5-1 of the document lists potential planned land use developments. The list completely ignores the potential for redevelopment of the Jackovics' Family properties. The analysis fails to look at the potential changes in land use and future development potential and possible build out of the Jackovics' properties. The planned roadway improvements result in property take, driveway reconfigurations, impact to emergency service access and likely adverse impacts to existing established business on the Jackovics' properties. The roadway improvement plans have the potential to accelerate growth and redevelopment of the properties as the owners struggle to maintain their properties vital to existing and future business interests. The subject properties are sensitive noise receptors yet no study has been conducted to include them. The properties will experience potential significant adverse visual impacts that cannot be mitigated to a level of "less than significant" with the proposed project. The properties will be adversely affected by traffic congestion on local streets resulting from the HWY 101 improvement project. Existing on-site parking facilities and driveways will need to be reconfigured and the Initial Study does not include adequate mitigations pursuant to CEQA guidelines. The cumulative analysis fails to take into consideration the potential additional VMT on local streets and the additional resulting emissions.

IV. SUMMARY AND CONCLUSIONS

Comment: The project Initial Study is inadequate, the project will result in potential significant adverse environmental impacts that have not been studied. Impacts that have been studied have significant adverse impacts that lack mitigation measures that meet CEQA standards and will not mitigate project impacts to "less than significant". A project EIR is required to review alternative projects to further minimize impacts to "less than significant".

The project Initial Study failed to provide a complete and open disclosure of the potential significant adverse environmental impacts that will result if the proposed project is constructed. The study "project description" is inadequate and presents erroneous information that miss informs the public about the need for the project. The study lacks a comprehensive analysis of "land use" impacts resulting on immediately adjacent properties, over 4.77 acres of land, owned by the Jackovics' Family.

The consultants approach is narrow, focused on a "HWY Centric" analysis that has internal inconsistencies even in the traffic study area defined. The study ignores the potential significant secondary impacts of the HWY 101 improvements on adjacent local streets. The study lacks a comprehensive review of property right of way takes, driveway closures and adverse impacts on traffic circulation on local streets. The study lacks impact analysis of the loss of 23 on-street parking used mostly by commuters. The study lacks any analysis potential impacts of local driveway closures on emergency service vehicle access to existing mixed commercial and retail uses.

mostly by commuters. The study lacks any analysis potential impacts of local driveway closures on emergency service vehicle access to existing mixed commercial and retail uses.

The analysis makes gross assumptions and conclusions of the project impacts that lack supporting evidence or that rely on evidence that is not relevant to the study area. The document avoidance, minimization and/or mitigation measures that are non-specific, lack detail and put off details required by CEQA Section 15370 Mitigation. For example, there is no detailed explanation of how the temporary and permanent property "takes" will be limited and/or what action would specifically be taken to limit the degree or magnitude of the action and its implementation.

There is no detailed plan for rectifying the impact, repairing, rehabilitating, or restoring the impacted environment, namely the Jackovics' Family properties. There are not details for eliminating the impacts of the project resulting over time by preservation or maintenance operations during the life of the action. Finally, there is no discussion of compensation for the impact by replacing or providing substitute land resources. The study fails to address the "take" impacts and the proposed mitigations do not meet the basic standards of CEQA.

The study proposes visual impact mitigations that do not mitigate the visual effects of the project because the visual impacts cannot be mitigated to a level of insignificance. However, this is not fully disclosed to the public in the document because the consultant's baseline assumptions are in error. The document shows that the visual impacts are significant and unavoidable given the proposed project.

Finally, and most importantly a project EIR is required to provide full, complete and accurate disclosure of the need for the project, the purpose, intent, goals and objectives of the project. Additional impact analysis is needed and a comprehensive presentation of "alternatives" that reduce impacts to "less than significant" is required to comply with the purpose and intent of the CEQA rules and guidelines. Proposed mitigations that meet CEQA Section 15370 are required to comply with CEQA rules. Any new environmental review document that is created to respond to the critical issues raised above will require re-circulation and it is requested that the re-circulation period be a minimum of 60 days.

Thank you for the opportunity to comment on this document. Please do not hesitate to contact me if there are questions.

Sincerely,

Scott L. Hochstrasser, President

CC: TAM Board
Town of Corte Madera Council
City of Larkspur

Attachments
Exhibit A "Property Information"
Exhibit B "Development Potential"
Exhibit C "Highway 101 Access Diagrams"
Exhibit D "Sir Francis Drake Blvd Access Diagrams"
Exhibit E "Traffic Noise Diagram"
Exhibit F "View Diagrams"

GREENBRAE / TWIN CITIES CORRIDOR PROJECT

DESIGN ANALYSIS: ADVERSE IMPACTS TO ADJACENT PROPERTIES

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JACKOVICS FAMILY PROPERTIES

CORTE MADERA, CA
JULY 23, 2012

INTRODUCTION

This analysis illustrates the impacts of the proposed Transportation Authority of Marin (TAM) and Cal Trans proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement Project on nearby properties on the West side of Highway 101. The study focuses on five properties held by the Jackovics family on the Western side of Highway 101 adjacent to, abutting, and lying between Nellen and Fifer Avenues. The properties are referenced here as property A, B, C, D, and E. The report graphically illustrates the impacts to the site's access, future development potential, and future value of the Jackovics' holdings in the study area caused by the proposed Improvement Project if it were completed.

The components of the Greenbrae/Twin Cities Corridor Improvement Project affecting the five properties are a proposed off-ramp fly-over, elimination of the Highway exit at Nellen Avenue, and elimination of automotive access off the Nellen Avenue frontage.

The impacts of the proposed changes include reduced access from Sir Francis Drake Blvd., increased length of travel distance, increased travel time, increased congestion on Lucky Drive, diminished view sheds, and significant noise intrusion to the study area. Other negative impacts not specifically illustrated in this analysis include: landlocked properties, relocated utility easements on private property, shading of properties adjacent to the fly-over, setbacks and right-of-way encumbrances dramatically reducing the buildable area.

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BAY AREA SITE PLAN

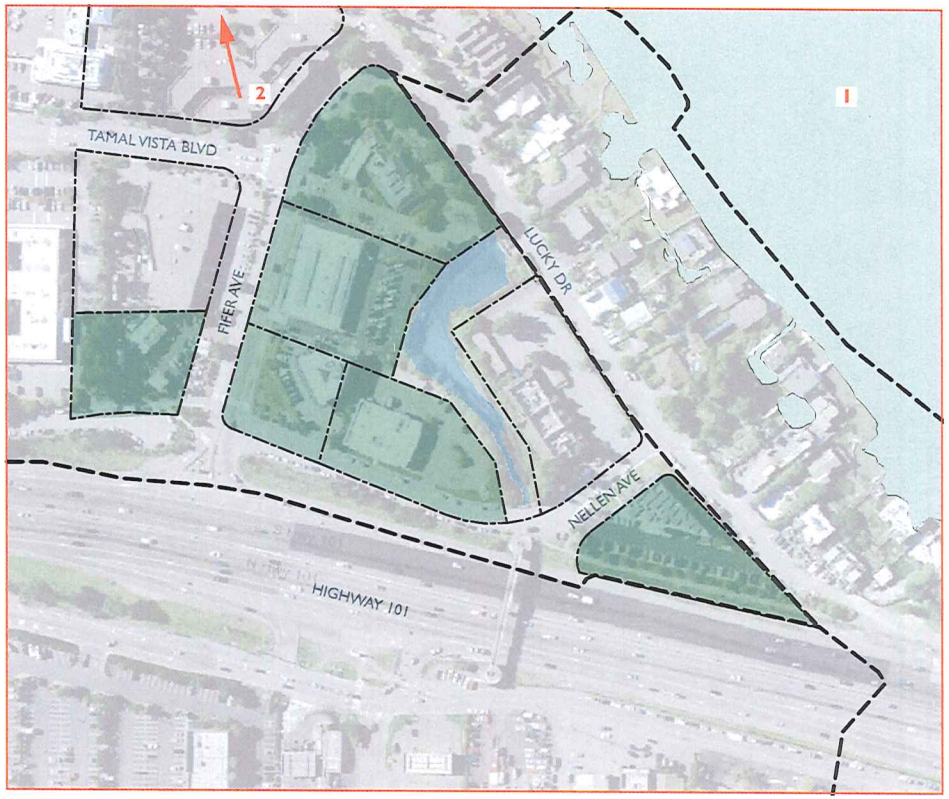
1 SITE VICINITY

2 MOUNT TAMALPAIS

3 RICHMOND - SAN RAFAEL BRIDGE

4 SAN FRANCISCO BAY

5 ANGEL ISLAND



VICINITY SITE PLAN

1 CORTE MADERA CREEK

2 VIEW TO MOUNT TAMALPAIS

SITE INFORMATION

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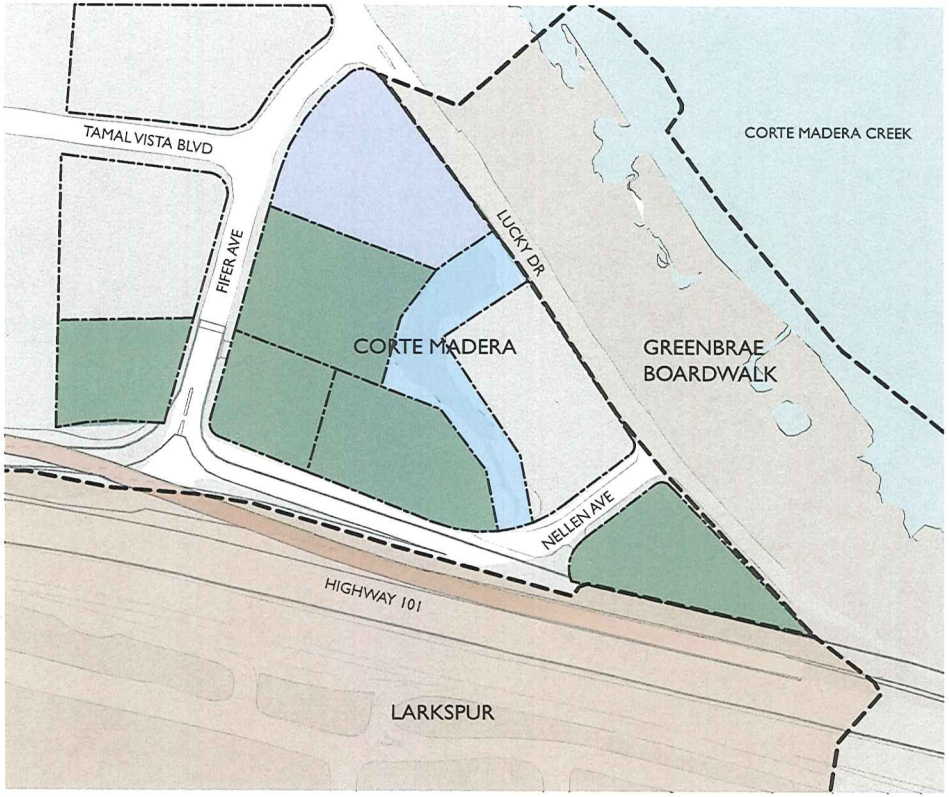
JACKOVICS FAMILY PROPERTIES

NOT TO SCALE N

CORTE MADERA, CA
JULY 23, 2012



JURISDICTION / ZONING PLAN

- ZONE BRNH - BAYLANDS RISK ZONE AND NATURAL HABITAT
- ZONE FC - FLOOD CONTROL & DRAINAGE FACILITIES DISTRICT
- ZONE C3 - HIGHWAY COMMERCIAL DISTRICT / MUC GENERAL PLAN
- DISTRICT BOUNDARY
- PARCEL BOUNDARY

PARCEL PLAN

A		C		E	
SITE AREA	30000 sq ft	SITE AREA	22500 sq ft	SITE AREA	26500 sq ft
APN	024-042-01	APN	024-041-16	APN	024-011-57
ADDRESS	101 NELLEN AVE	ADDRESS	150 NELLEN AVE	ADDRESS	200 NELLEN AVE
B		D		F	
SITE AREA	35680 sq ft	SITE AREA	44866 sq ft	SITE AREA	48210 sq ft
APN	024-041-12	APN	024-041-02	APN	024-041-15
ADDRESS	110 NELLEN AVE	ADDRESS	10 FIFER AVE	ADDRESS	2 FIFER AVE

TOTAL ACREAGE OF ENTIRE PARCEL COLLECTION: 4.77 ACRES

EXHIBIT A "PROPERTY INFORMATION"

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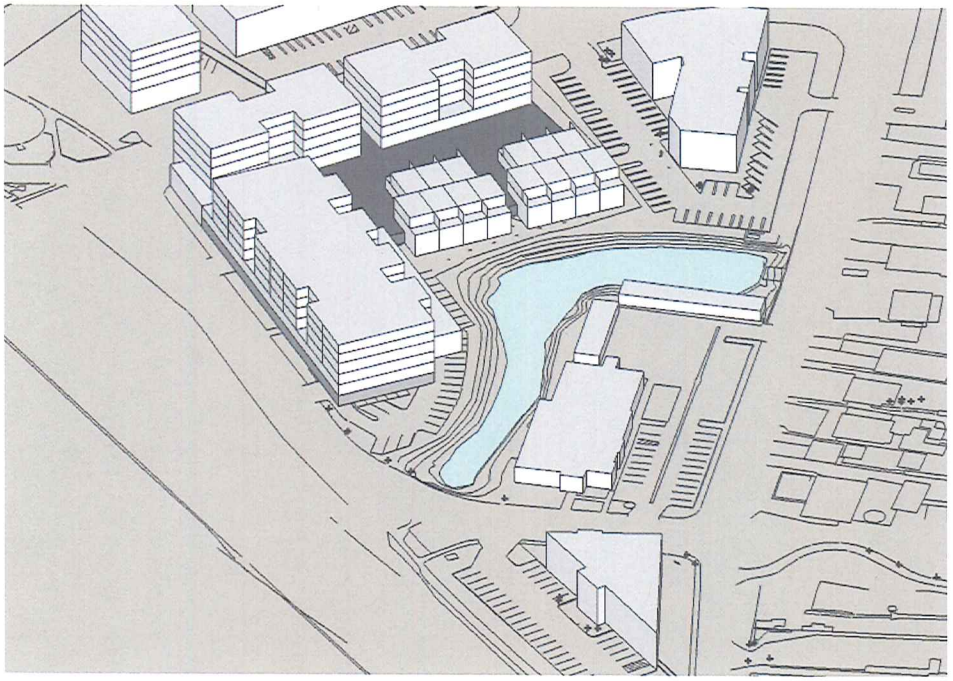
JACKOVICS FAMILY PROPERTIES

SCALE: 1"= 160'-0"

N

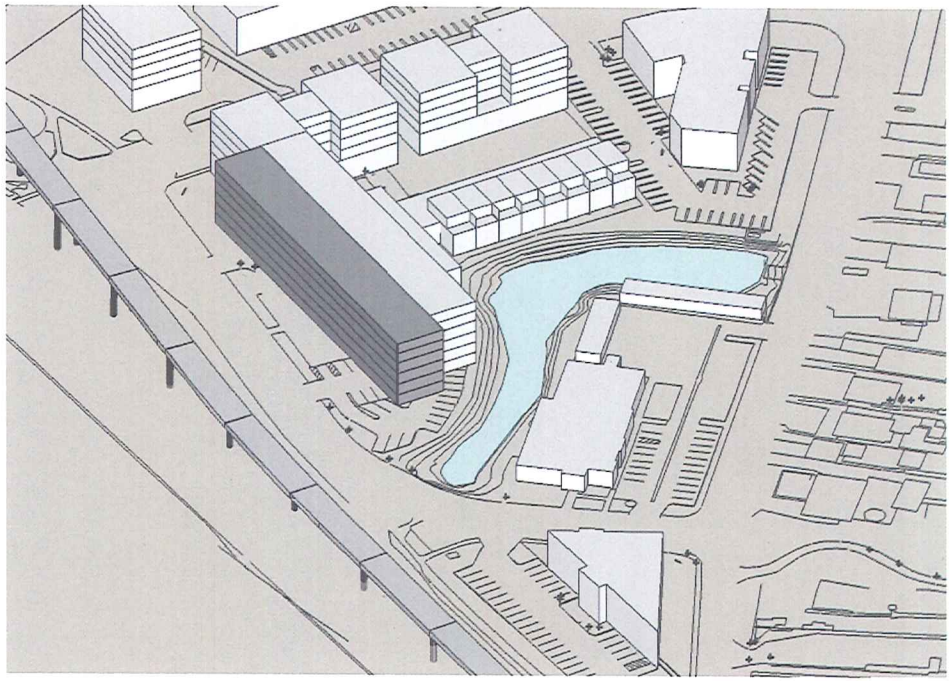
CORTE MADERA, CA
JULY 23, 2012



EXISTING SITE

PARKING STRUCTURE

SITE CONDITIONS ALLOW 195,000 SQ FT OF DEVELOPMENT.



SITE WITH PROPOSED FLY-OVER

PARKING STRUCTURE

SITE CONDITIONS ALLOW 155,000 SQ FT OF DEVELOPMENT.

Currently the existing site(s) are zoned with a .34 floor area ratio (FAR). Nearby properties have recently been approved with a FAR of 1.56. We have used test floor area ratios (FAR) of 2.0 and 1.5 as well as a building program that includes retail, health & fitness services, and housing. These parcels as they exist currently could support as much as 200,000 square feet (sq. ft.) of housing and retail. Using a 1.5 FAR sites (A,B,C, and D) could support approximately 150,000 sq. ft. of retail and housing development. As tested the existing sites could support approximately 195,000 sqft. of development. With the addition of the fly-over, the site would support a reduced 155,000 sq. ft. development.

The massing studies do not reflect actual proposed designs but were developed to illustrate the program on site and test the impacts to the potential development on the properties as they currently exist as compared to the impacts of proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement Project. The housing component assumes a mix of townhouse type units and one and two bedroom units. The retail component is non-specific but is assumed to be neighborhood serving businesses such as market, drycleaner, fitness center, and other retail.

The Existing Site massing study uses a podium approach. A podium approach uses parking at grade with building and green space above as a sensible and economic approach to parking and flood control. It results in a highly efficient and cost effective solution allowing greater density due to vehicle access, light, and views at the properties.

On the Site with Fly-over similar massing is applied, but with structured parking. Although structured parking is significantly more expensive, it is employed in this study as the views to the East are severely compromised and therefore not suitable for housing. Additionally, it is used to shield the properties from the inherent noise intrusion of the fly-over. This approach results in less building area because the structured parking replaces what would have been housing and eliminates the opportunity for parking on grade.

EXHIBIT B "DEVELOPMENT POTENTIAL"

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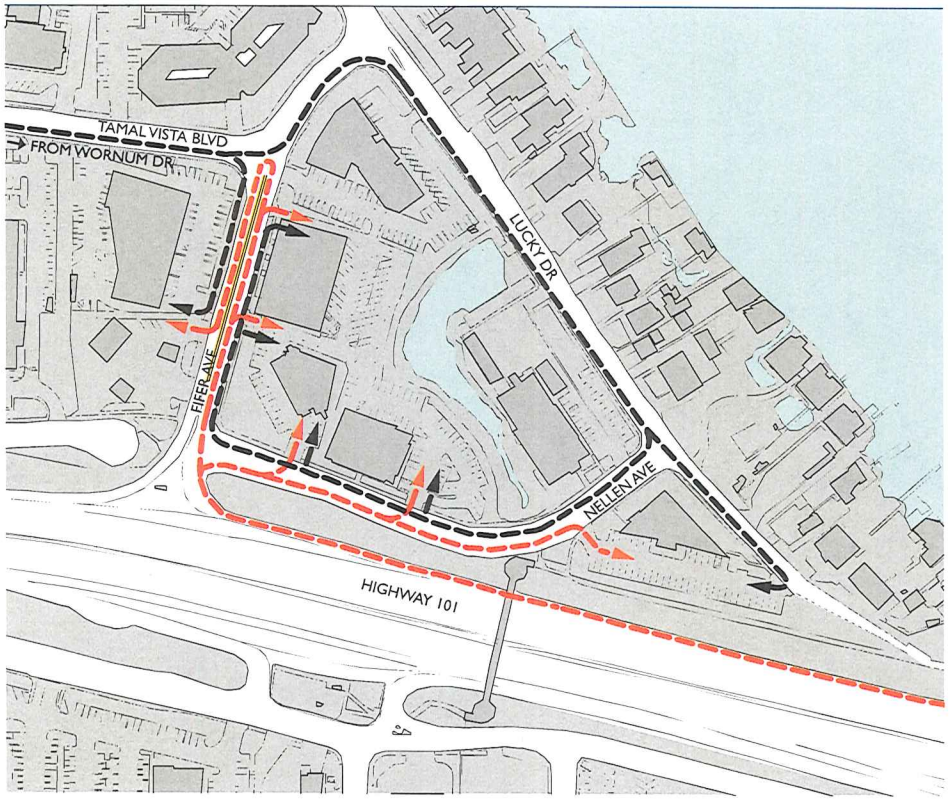
JACKOVICS FAMILY PROPERTIES

NOT TO SCALE

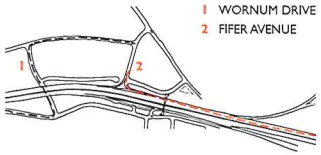
CORTE MADERA, CA
JULY 23, 2012



EXISTING SITE

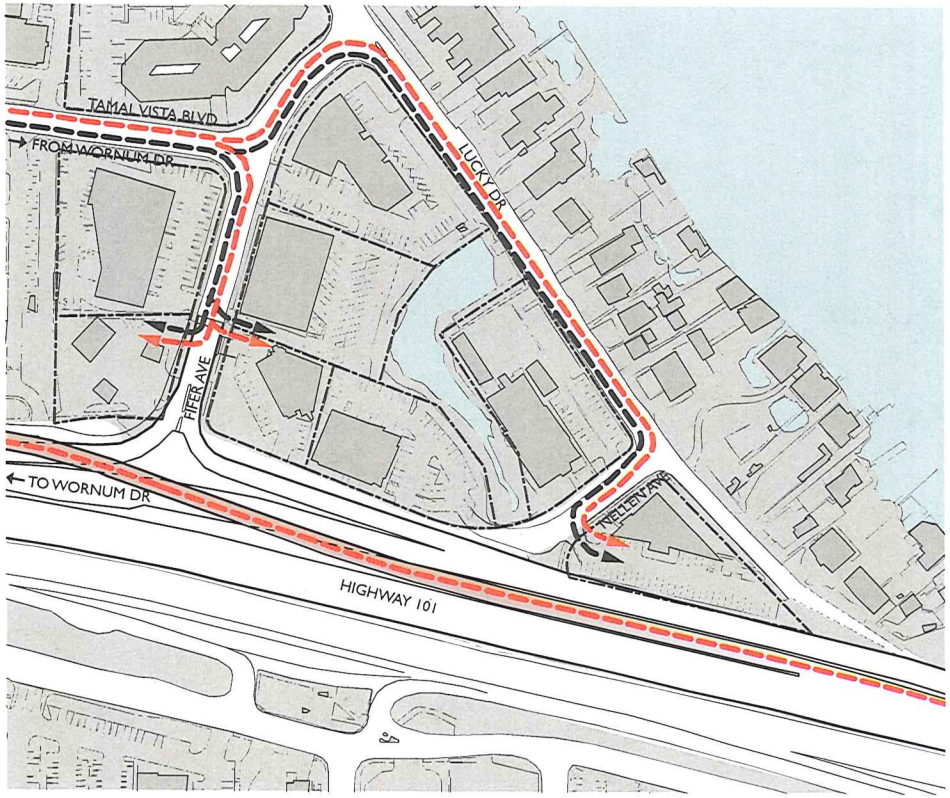
ACCESS FROM SOUTHBOUND HIGHWAY 101

ACCESS FROM NORTHBOUND HIGHWAY 101



1 WORNUM DRIVE
2 FIFER AVENUE

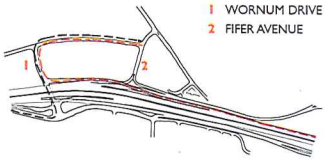
SITE IS ACCESSIBLE FROM 7 DRIVE ENTRANCES.



SITE WITH PROPOSED FLY-OVER

ACCESS FROM SOUTHBOUND HIGHWAY 101

ACCESS FROM NORTHBOUND HIGHWAY 101



1 WORNUM DRIVE
2 FIFER AVENUE

SITE IS ACCESSIBLE FROM 3 DRIVE ENTRANCES.

TRAVEL DISTANCE TO SITE FROM SOUTHBOUND HWY 101 INCREASED APPROXIMATELY .5 MILES DUE TO ELIMINATION OF FIFER AVE EXIT.

EXHIBIT C "HIGHWAY 101 ACCESS DIAGRAMS"

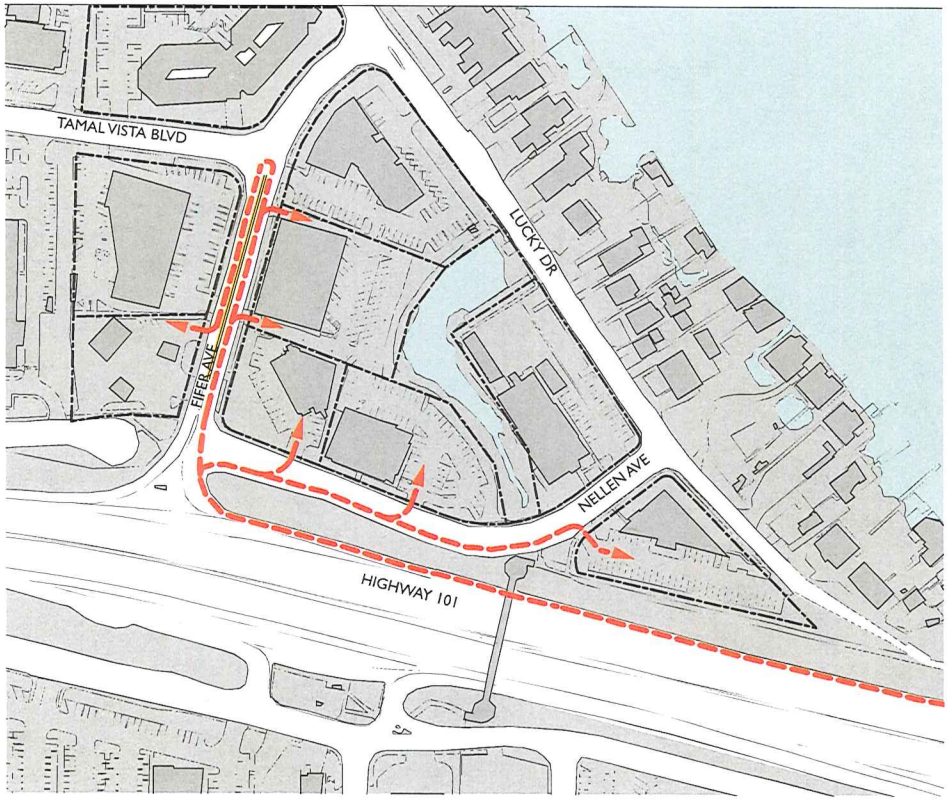
kda
phone: 510.841.3555 fax: 510.841.1225
1810 sixth street, berkeley, ca 94710
kahndesignassociates.com

JACKOVICS FAMILY PROPERTIES

SCALE: 1"= 160'-0"

N

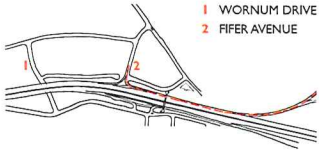
CORTE MADERA, CA
JULY 23, 2012



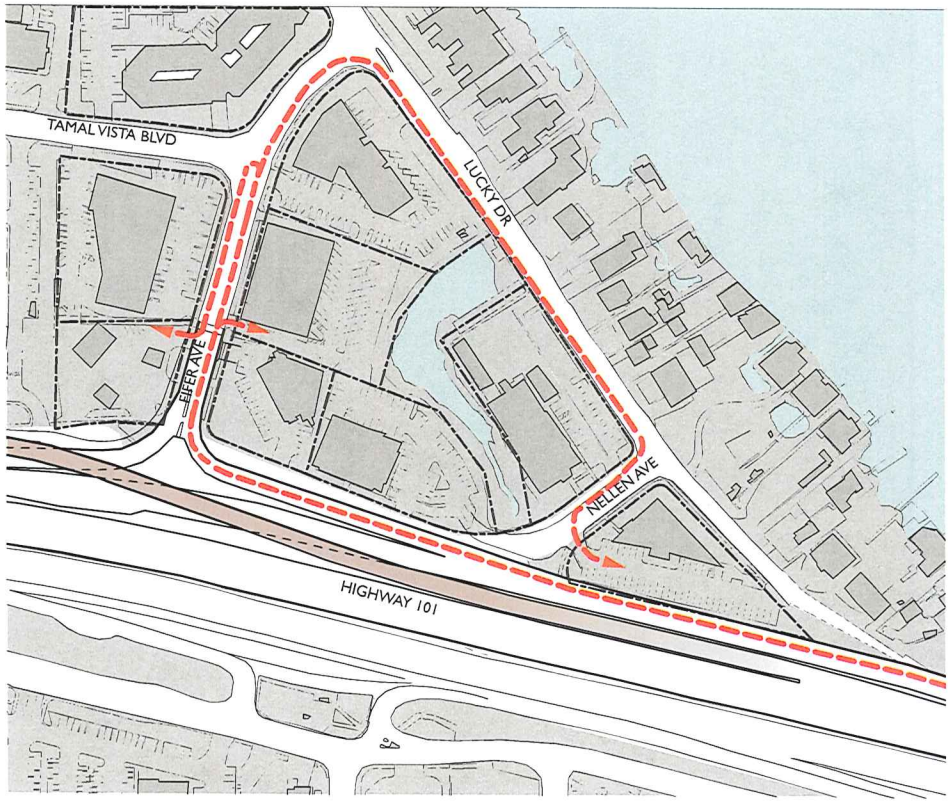
EXISTING SITE

ACCESS FROM SIR FRANCIS DRAKE BLVD, SOUTHBOUND

SITE IS ACCESSIBLE FROM 6 DRIVE ENTRANCES.



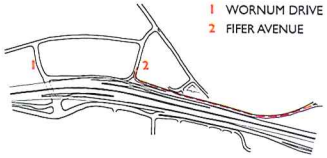
1 WORNUM DRIVE
2 FIFER AVENUE



SITE WITH PROPOSED FLY-OVER

ACCESS FROM SIR FRANCIS DRAKE BLVD, SOUTHBOUND

SITE IS ACCESSIBLE FROM 3 DRIVE ENTRANCES.



1 WORNUM DRIVE
2 FIFER AVENUE

EXHIBIT D "SIR FRANCIS DRAKE BLVD ACCESS DIAGRAMS"

kda
phone: 510.841.3555 fax: 510.841.1225
1810 sixth street, berkeley, ca 94710
kahndesignassociates.com

JACKOVICS FAMILY PROPERTIES

SCALE: 1"= 160'-0"

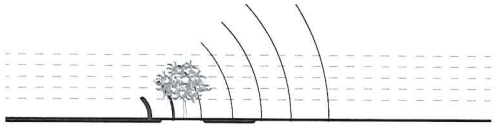
N

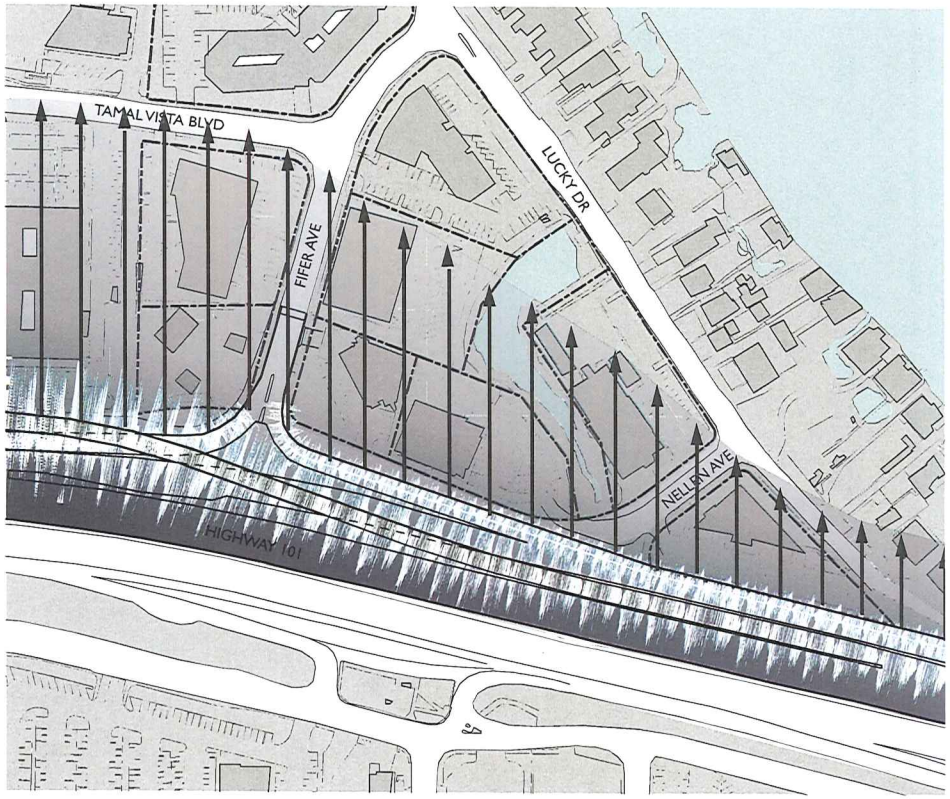
CORTE MADERA, CA
JULY 23, 2012

EXISTING SITE

TRAFFIC NOISE

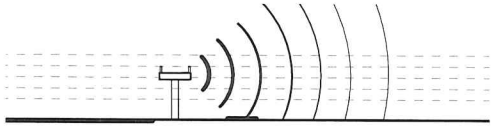
LANDSCAPE SOUND BARRIER





SITE WITH PROPOSED FLY-OVER

TRAFFIC NOISE



"By elevating the roadway, the noise source is much more efficient at projecting sound into the distance - like an air raid siren... The results show conclusively that an elevated roadway is 3db louder than a ground level roadway. This is twice the noise energy and 50 percent louder than the ground level roadway.... [Gound level] impacts are both less evere, and easier to mitigate..."

Fix290 Noise Report prepared by Mesa Engineering; analysis of Hwy 290/71 Interchange in Oak Hill, TX

EXHIBIT E "TRAFFIC NOISE DIAGRAMS"

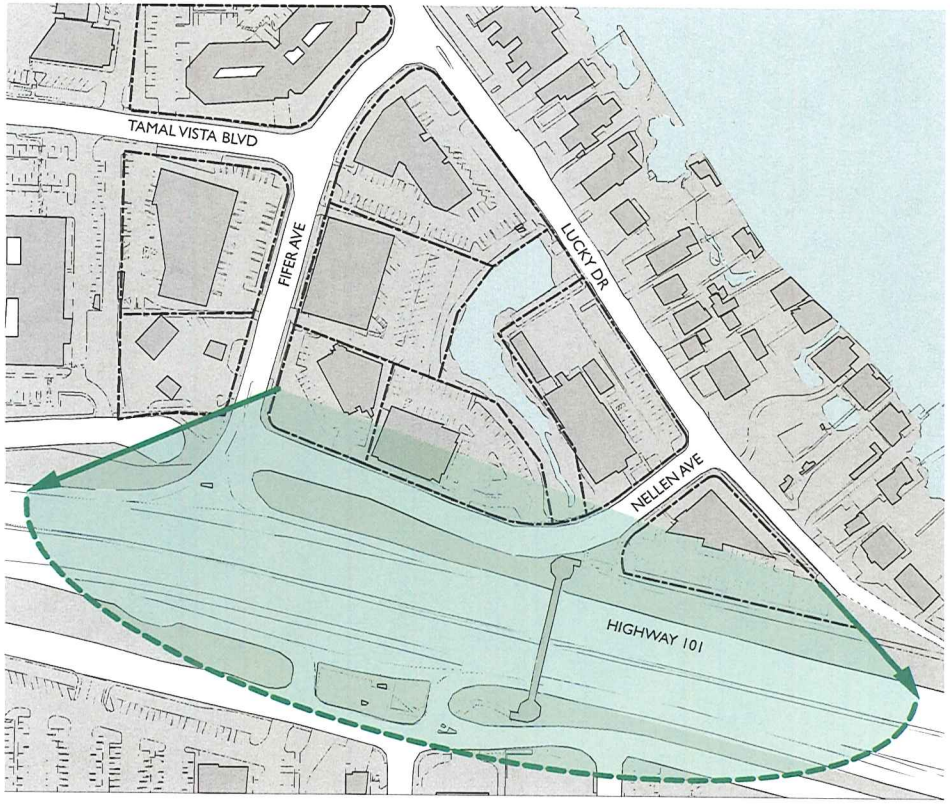
kda
phone: 510.841.3555 fax: 510.841.1225
1810 sixth street, berkeley, ca 94710
kahndesignassociates.com

JACKOVICS FAMILY PROPERTIES

SCALE: 1"= 160'-0"

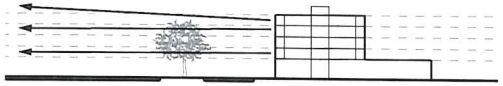
N

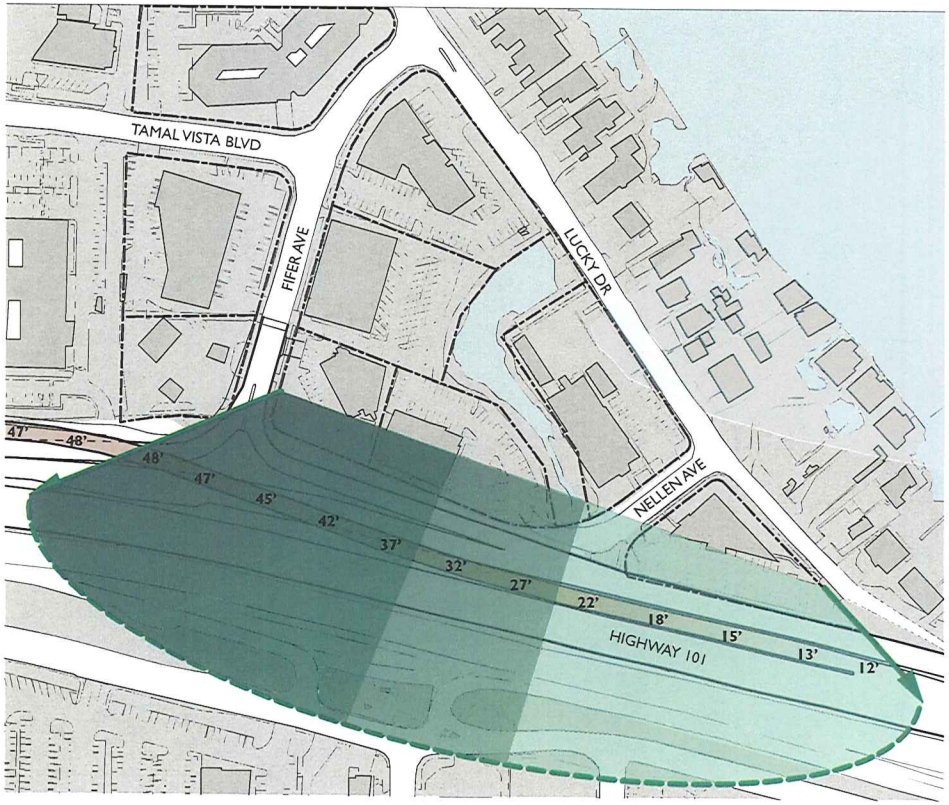
CORTE MADERA, CA
JULY 23, 2012



EXISTING SITE

VIEW SLIGHTLY AFFECTED
(HWY STRUCTURE 0 - 5' IN HEIGHT)





SITE WITH PROPOSED FLY-OVER

VIEW MODERATELY AFFECTED
(FLY-OVER STRUCTURE 10' - 25' IN HEIGHT)

VIEW SEVERELY AFFECTED
(FLY-OVER STRUCTURE 25' - 35' IN HEIGHT)

VIEW EXTREMELY AFFECTED
(FLY-OVER STRUCTURE 35' - 48' IN HEIGHT)

XX' HEIGHT OF PROPOSED FLY-OVER
HEIGHTS TAKEN FROM TOP OF CONCRETE BARRIER

EXHIBIT F "VIEW DIAGRAMS"

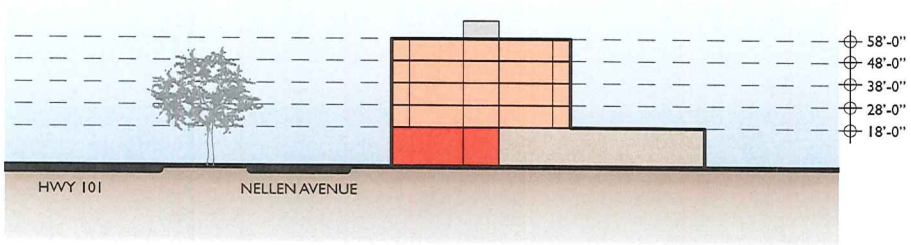
kda
phone: 510.841.3555 fax: 510.841.1225
1810 sixth street, berkeley, ca 94710
kahndesignassociates.com

JACKOVICS FAMILY PROPERTIES

SCALE: 1"= 160'-0"

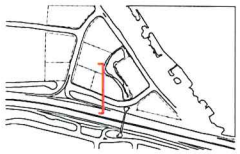
N

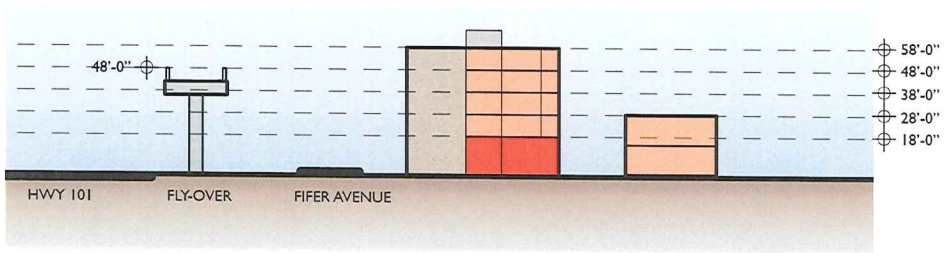
CORTE MADERA, CA
JULY 23, 2012



EXISTING SITE

PARKING
RESIDENCES
RETAIL





SITE WITH PROPOSED FLY-OVER

PARKING
RESIDENCES
RETAIL

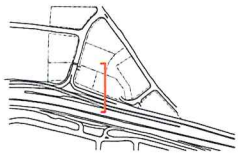


EXHIBIT G "DEVELOPMENT POTENTIAL SECTION DIAGRAMS"

kda
phone: 510.841.3555 fax: 510.841.1225
1810 sixth street, berkeley, ca 94710
kahndesignassociates.com

JACKOVICS FAMILY PROPERTIES

SCALE: 1"= 50'-0"

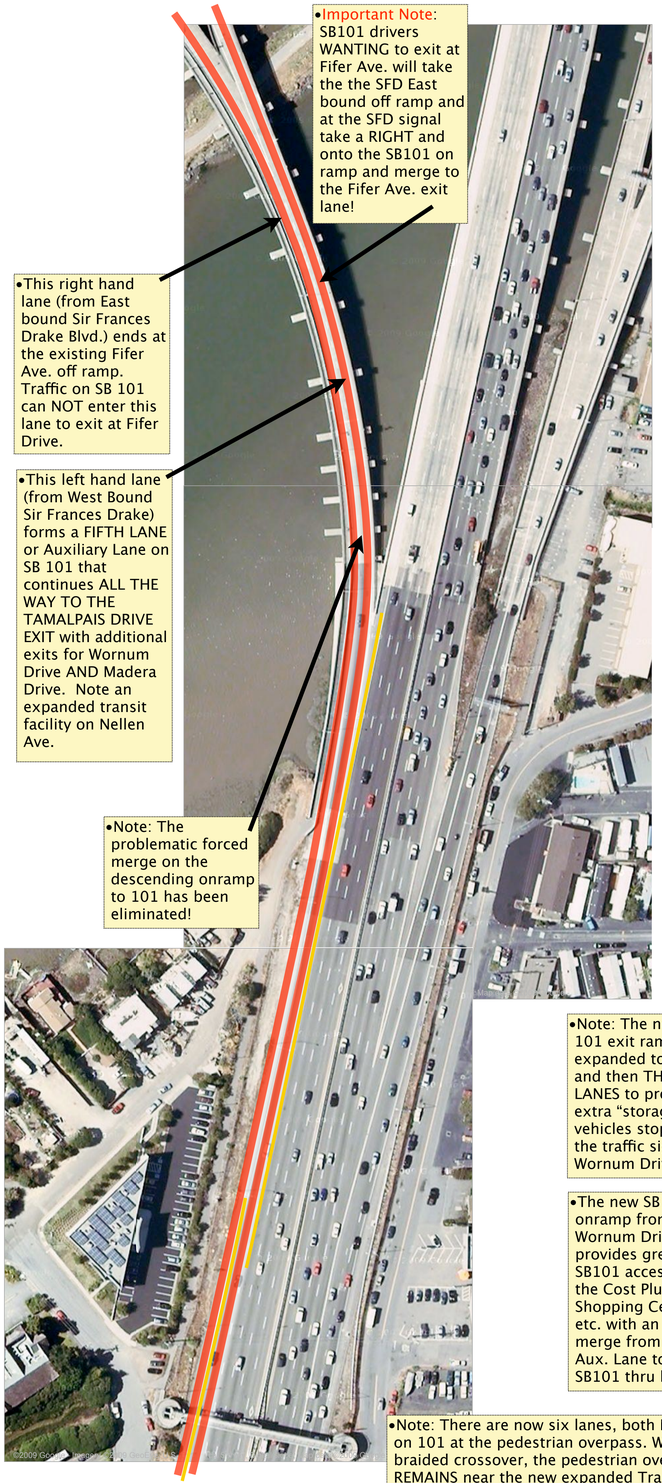
CORTE MADERA, CA
JULY 23, 2012

A "Simple" and clearly detailed Plan for the Highway 101 Greenbrae/Twin Cities Corridor Improvements Project, or PLAN "S" for short.

Connecting Arial views, left to right - North to South

All lane configurations/changes are in red (including related connecting lanes)

Emphasis is on the South Bound direction eliminating the Proposed Braided Crossover!

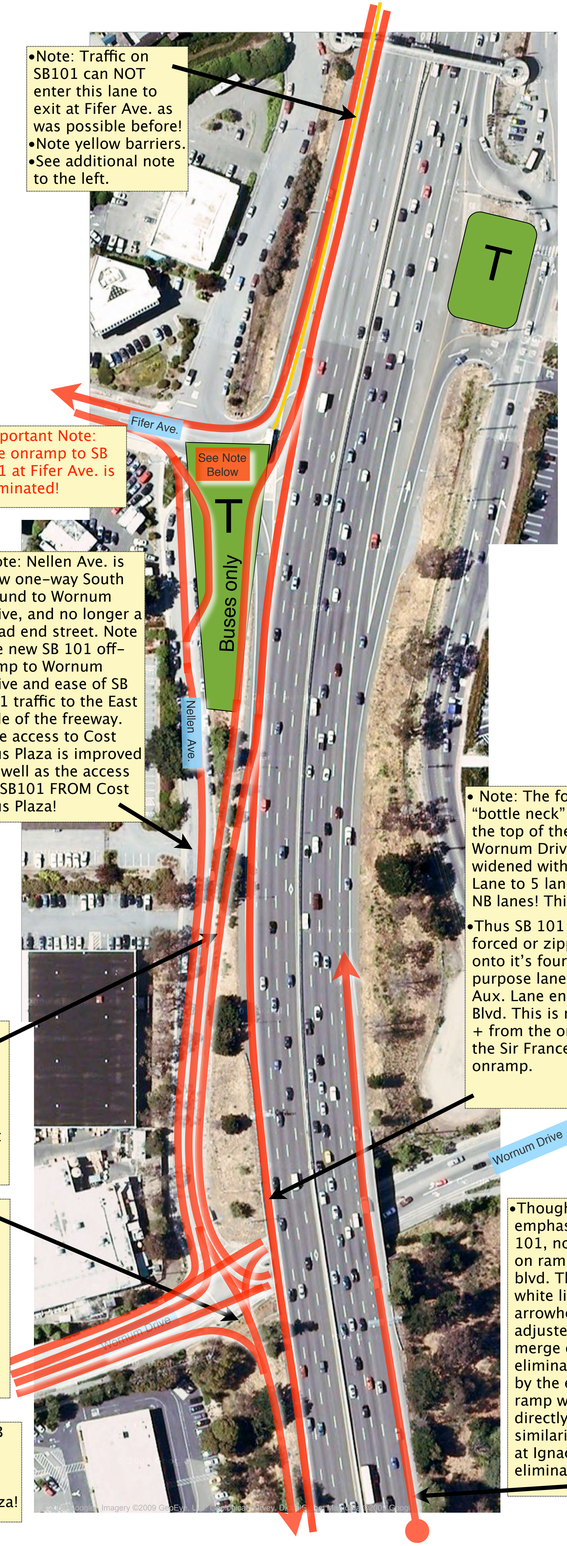


•Important Note: SB101 drivers WANTING to exit at Fifer Ave. will take the the SFD East bound off ramp and at the SFD signal take a RIGHT and onto the SB101 on ramp and merge to the Fifer Ave. exit lane!

•This right hand lane (from East bound Sir Frances Drake Blvd.) ends at the existing Fifer Ave. off ramp. Traffic on SB 101 can NOT enter this lane to exit at Fifer Drive.

•This left hand lane (from West Bound Sir Frances Drake) forms a FIFTH LANE or Auxiliary Lane on SB 101 that continues ALL THE WAY TO THE TAMALPAIS DRIVE EXIT with additional exits for Wornum Drive AND Madera Drive. Note an expanded transit facility on Nellen Ave.

•Note: The problematic forced merge on the descending onramp to 101 has been eliminated!



•Note: Traffic on SB101 can NOT enter this lane to exit at Fifer Ave. as was possible before!
•Note yellow barriers.
•See additional note to the left.

•Important Note: The onramp to SB 101 at Fifer Ave. is eliminated!

•Note: Nellen Ave. is now one-way South bound to Wornum Drive, and no longer a dead end street. Note the new SB 101 off-ramp to Wornum Drive and ease of SB 101 traffic to the East side of the freeway. The access to Cost Plus Plaza is improved as well as the access to SB101 FROM Cost Plus Plaza!

• Note: The four lane SB "bottle neck" formed at the top of the SB101/ Wornum Drive overpass is widened with an Aux. Lane to 5 lanes like the NB lanes! This is key!

•Thus SB 101 has no forced or zipper merging onto it's four general purpose lanes until the Aux. Lane ends at Madera Blvd. This is nearly a mile + from the origin point at the Sir Frances Drake onramp.

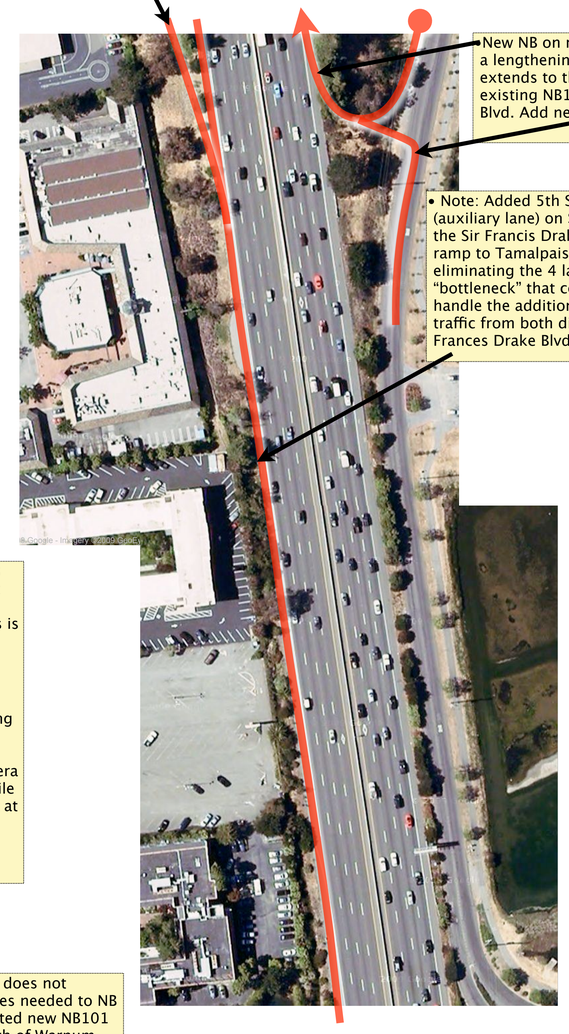
•Note: The new SB 101 exit ramp is expanded to TWO and then THREE LANES to provide extra "storage" for vehicles stopped at the traffic signal at Wornum Drive..

•The new SB101 onramp from Wornum Drive provides great SB101 access from the Cost Plus Shopping Center etc. with an easy merge from the Aux. Lane to the SB101 thru lanes.

•Though this plan does not emphasize changes needed to NB 101, note suggested new NB101 on ramp just south of Warnum blvd. The placement of the solid white line just above the arrowhead no doubt needs to be adjusted to allow more time to merge onto NB101. This is key to eliminating the NB weaving done by the existing Industrial Way on ramp with drivers wanting to go directly onto Hwy 101! Note similarities to the changes made at Ignacio Blvd. and NB101 to eliminate a similar problem.

•Note: There are now six lanes, both NB & SB on 101 at the pedestrian overpass. With no braided crossover, the pedestrian overpass REMAINS near the new expanded Transit Station(s) and the shopping at Cost Plus Plaza!

• This is the NEW SB onramp from Wornum Drive onto the new Aux Lane. Note nice long merge time to change lanes from the new auxiliary lane to SB101!!



New NB on ramp to NB101. This is a lengthening of the Aux. lane that extends to the beginning of the existing NB101 exit lane for SFD Blvd. Add new left turn signal.

• Note: Added 5th SB lane (auxiliary lane) on SB101 from the Sir Francis Drake SB101 on ramp to Tamalpais Drive thus eliminating the 4 lane "bottleneck" that could not handle the additional merging traffic from both directions on Sir Frances Drake Blvd.!

•Exit ONLY at Madera Blvd. with the Auxiliary lane (5th lane) continuing to Tamalpais Drive. This allows time and opportunity to merge with SB101 after entering from Warnum Drive. SB101 Drivers can safely us Tamaopais Drive or Warnum Drive SB on ramps!

•Instead of the Northbound onramp to NB101 merging immediately into the #4 lane, delay the forced merge to just before the new NB101 on ramp South of Wornum Drive.

T

The 101 Transit Station at Fifer Ave./Nellen Ave. is greatly expanded to include Kiss-and-Ride and transfers to local feeder buses! Facilities and secure bike racks and a possible future vehicle parking structure with electric vehicle charging stations (maybe restricted to electric vehicles only). Buses will have override control at the traffic light at Wornum Drive to facilitate rapid access to SB101. Note recommended NB101 Transit Station across the freeway.

Submitted to Caltrans, TAM, and other governmental bodies by Scott Stokes, 11/24/09
Comments and suggestions are encouraged. Email Scott at feedback@marinbackup.com

Date: January 24, 2013

To: Transportation Authority of Marin Board of Commissioners

From: Scott Stokes, San Rafael Resident

Subject: Highway 101 Greenbrae/Twin Cities Corridor Improvement Project

I thank you for this opportunity to once again address the Board concerning this Corridor Improvement Project. I have a degree in Industrial Engineering and a minor in Transportation from Northwestern University. I have worked in the Transportation planning field for many years and at the Chicago Transit Authority for over 6 years. You might remember my monthly South Bound 101 **Congestion Traffic Reports** caused by the lack of a southbound 101 auxiliary lane from Freitas Pkwy to Central San Rafael at past Board meetings. Remember, you are Marin's Congestion Management Agency.

I have opposed the current design and excessive complexity of this Corridor Improvement Project for more than 4 years. My "Plan Simple" or "Plan S" has been presented to the Board before, and was previously submitted as Public Comment to Caltrans and TAM. I do so again.

In simple terms, one must identify the problems, their causes, and come up with an economically viable and workable solution benefiting the widest possible number of constituents. The current plan is not such a plan.

"Plan S" is a creative redesign addressing the corridor's problems with the least cost and negative impacts. I request that each of you view and read the explanatory comments about each feature of Plan S and carefully compare it's efficiency with the excessively complex and expensive plan currently under environmental review. Please pay special attention to the proposed new **South Bound 101 on-ramp from Wornum Drive** and, taking into account my Transit background, the **Mini-Transit Center** proposed in the heart of the project. This is not a mishmash of separate bus shelters plopped down with no particular coordinated service in mind.

Scott Stokes, San Rafael, CA M: 415-246-9156 email: feedback@marinbackup.com

The "Plan Simple" Transit Center would provide Direct 101 line-haul access with local distribution and Kiss'n Ride access under a single canopy. Another important point, not to be overlooked, is that the **current pedestrian/bike over crossing would remain and continue serving the local community**. The MBC should like that.

I do not think the proposed pair of expensive and massive flyovers in the current plan are needed!

I will be glad to answer questions after this meeting as well as come and give any of you a detailed and comparative explanation of Plan S. If you want, I would be glad to simply email Plan S in pdf format for your review and comparison with the current plan. My contact information is below.

I think there are many desirable features of the current plan that I would certainly like to see implemented and some I have not detailed here in Plan S, **but, I <u>don't</u> think the current design serves Marin's future needs, for all transportation modes, as well as Plan S does... To say nothing about the sizable cost savings.**

Thank you for your time.

Sincerely,

Scott Stokes

Scott Stokes, San Rafael, CA M: 415-246-9156 email: feedback@marinbackup.com

Winscott Stokes <feedback@marinbackup.com> January 31, 2013 10:24 PM

To: Diane Furst <defurst@gmail.com>

Quick note on the G/TC Corridor Project.

Hi Diane,

A quick note on the G/TC Corridor Project.

Sean (consultant for TAM) informed me at the meeting the other night that they (TAM/Caltrans) were under strict instructions/requirements by resolutions passed by the Town Council of Corte Madera (?) that the existing **exit and entrance ramps on SB 101 (Madera Blvd.and Fifer Ave./Lucky Drive) must be left open.** If this is true, we are in trouble.

Please note that my plan to **eliminate** the planned flyovers **and** the demolition of the existing pedestrian crossing calls for the **moving of the Fifer Ave/Lucky Drive on-ramp to Wornum Drive!** If there is an issue with this, I would appreciate an opportunity to explain why this is so important.

I'm surprised that **smaller specific projects** (small steps) have not been developed to eliminate much of the congestion in that area, i.e. improve traffic flow/safety on 101 and the local streets. I might suggest:

1. Adding that desperately needed **SB 101 Auxiliary Lane over Wornum Drive**, thus eliminating a very dangerous merge on the incline there!! This in my mind is a **top priority.**

2. Widen the **NB 101 exit to SFD Blvd. (where you gain access to NB 101 and access to the R/SR Bridge) to three lanes** and make needed channelization changes at the light. A lot of NB 101 evening commuter congestion is caused by this location. I might add that the a video of the project shows this ramp as a single lane! LOL.

3. Widen the **SB 101 exit to SFD Blvd. that takes you to the Ferry Terminal to two lanes** to help train people to turn right there to go directly to Fifer Ave. utilizing the two lane SB SFD Blvd. on-ramp.

If you want to talk more on this subject, just call. "Call me maybe." :-)

Scott Stokes
369 Orange Blossom Lane
San Rafael, CA 94903
macscottcu@me.com
Mobile: (415) 246-9156

Name Mary Connolly
Address 51 Chickasaw Court
City Corte Madera, CA 94925
Date February 13, 2013
Email mcconnolly@lbl.gov

Caltrans District 4
Attention: Valerie Shearer
Senior Environmental Planner
Office of Environmental Analysis, MS-88
P.O. Box 23660
Oakland, CA 94623-0660

Dear Ms. Shearer:

Please acknowledge receipt of this comment letter to confirm that it is included in the public comment process. These comments apply to the Highway 101 Greenbrae/Twin Cities Corridor Improvements Draft Environmental Document.

The project will result in the following significant environmental impacts, which cannot be mitigated. The Negative Declaration is not appropriate. A full Environmental Impact Report (EIR) is required by law and must be done.

1. **Flyovers and 7 proposed soundwalls will create substantial massive visual intrusions** on the existing scenic townscape, including but not limited to Corte Madera, Larkspur, and Greenbrae. The massive concrete structures will become a dominant landscape feature when looking down from the top of Mount Tamalpais, Marin's premier view spot, as the project area sits directly below East Peak.

2. **Flyovers will create significant noise that will be detrimental to residents of the area**, including residents of the Greenbrae Marina and Boardwalk, the Golden Gate and Marin Travel Trailer Parks, residents in hill areas of unincorporated Greenbrae above Sir Francis Drake Blvd., Madera Village Suites and the Best Western Hotel. Seven proposed sound barriers will do little to dampen noise, and will instead amplify and funnel noise into nearby and surrounding hillside neighborhoods.

3. **Local traffic will continue to be adversely impacted, in particular during several years of construction**, which will limit local mobility, especially on northbound Tamal Vista between Wornum and Fifer, and as drivers seek alternative routes and spillover onto local streets. Traffic already backs up Northbound on Tamal Vista for several hours each day during the Holiday shopping season from November to January, and at other times.

4. **Bicycle and pedestrian routes will be more dangerous than the existing routes**, as the Wornum Interchange will require crossing busy new ramp lanes and up to four signalized intersections close together on Wornum Drive.

5. Additional pavement will exacerbate existing flooding problems.

6. Relocation of bus stops will result in a path of travel that will be difficult for the disabled to use.

This project does not meet the stated goals of increased safety and reduced traffic congestion. The Draft Environmental Document is inadequate due to the following:

7. **The project does not increase traffic capacity on Highway 101, and only reduces commute time by 1 min/20sec in the Southbound 101 direction and from 6-8 minutes in the Northbound 101 direction by the year 2035.** This savings is hardly worth the $143 million price tag.

8. **The proposed project does not increase traffic capacity on East and Westbound Sir Francis Drake**, thus severe traffic congestion will continue to exist in both directions on this main thoroughfare.

9. **Vehicular safety improvement is not demonstrated and traffic collision data in the document is inaccurate** as it includes 150+ collisions with San Francisco addresses and 2 fatalities caused by medical conditions, not road conditions. The existing project area already has a below-average collision rate, as illustrated in Table 13 of the Traffic Operations Report.

Mary C. Connolly
2-13-2013

10. **This project does not adequately comply with "Complete Streets" concepts**, which require transportation projects to serve all users, including cyclists, pedestrians and transit users.

11. **There is no evidence that either Golden Gate Transit or Marin Transit will provide bus routes** to serve transit riders at the four new bus stops in the Greenbrae Interchange.

12. **There is inadequate analysis of parking impacts in areas where street-front parking is being eliminated**, and there is no parking or safe drop-area at several bus stops.

13. **There is inadequate analysis of impacts related to eliminating the existing Nellen Avenue**, which serves as the street frontage and access to several longtime businesses.

14. **There is inadequate analysis of visual impacts on the adjacent communities**

15. **There is inadequate analysis of noise impacts** on the adjacent communities.

16. **There is insufficient information about impacts to the community during the project construction** period, which will include numerous and prolonged detours as well as installation of 273 piles (90 ft. long) through 75+ feet of bay mud.

17. **There is insufficient analysis of impacts in or near Corte Madera Creek**, including impacts on sensitive habitat, wildlife, and water quality.

18. **There is inadequate analysis of population and traffic projections**, which are outdated and inconsistent, especially in regard to recent growth forecasts issued by the State Department of Finance.

19. There is inadequate analysis of future growth in the adjacent area.

20. **There is inadequate analysis of compliance with significant components of the Town of Corte Madera General Plan, the City of Larkspur General Plan and the Marin Countywide Plan.**

21. **There are not sufficient project alternatives for consideration** in the OED.

Cal Trans needs to change this project:

22. **Public opposition to the "Build" project is significant.**

23. The "No Build" alternative has fewer adverse impacts than the "Build" project.

24. Less massive, less expensive and less drastic **alternatives need to be considered**.

25. The **project does not address existing flooding** and future sea level rise.

26. **The proposed Wornum Interchange will create potentially dangerous conditions for pedestrians and bicyclists, many of them school-age children**, and disabled persons who use it to travel between the West and East side of the Twin Cities and surrounding areas.

27. Local traffic needs a safe left turn option out of the Trader Joe/Cost Plus Plaza.

28. **Congestion on East and West Sir Francis Drake Boulevard must be addressed**, particularly as three eastbound lanes leading to Highway 580 and the Richmond-San Rafael Bridge shrink down to one lane, which is what causes the backup each weekday afternoon on Highway 101.

Signature Mary C. Connolly Date 2-13-2013

February 13, 2013

Caltrans District 4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

Subject: The San Francisco Bay Trail and the Greenbrae Corridor Interchange Project

Dear Ms. Shearer:

We appreciate the opportunity to comment on the draft mitigated negative declaration for the above-referenced project. The Bay Trail is a planned 500-mile shoreline bicycling and hiking path around San Francisco Bay. When complete, the trail will pass through 47 cities, all nine Bay Area counties, and cross seven toll bridges. To date, 66% of the Bay Trail alignment has been developed. The goal of the Bay Trail is a Class I multi-use pathway around the entire San Francisco Bay as close to the shoreline as possible.

The Bay Trail and the Central Marin Ferry Connection Project

In 2003, the Bay Trail awarded a $69,000 grant to the City of Larkspur to evaluate the feasibility of five trail alignment options within the Central Marin Ferry Connection Project (CMFCP) identified in the Marin County Bicycle and Pedestrian Master Plan. Via a public and stakeholder driven process, two alternatives for crossing Corte Madera Creek and utilizing the railroad corridor south on the "Wornum curve" to existing Bay Trail at Wornum and Redwood were identified. Upon completion of the study, the Transportation Authority of Marin (TAM) assumed lead agency responsibility.

The selected preferred alignment was Alternative 1B whose main feature is a high-level bridge over Corte Madera Creek in the footprint of the old railroad trestle. Heading south, Alternative 1B remains on the railroad corridor until connecting with existing Bay Trail on Redwood Highway at Wornum. Alternative 1C uses the "bent caps" of the existing northbound Sir Francis Drake Boulevard exit for a 12-foot wide multi-use path instead of a high-level bridge. After touching down on Redwood, this option requires access through a mobile home park before connecting with the railroad corridor and heading south to Wornum & Redwood. As the GCIP is

Administered by the Association of Bay Area Governments

P.O. Box 2050 • Oakland, CA 94604-2050

Phone: 510-464-7900 • Fax: 510-464-7970

Web: www.baytrail.org

constructing the path on the bent caps as part of the overall project, it seems prudent to pursue alternative 1C in the near term. The GCIP provides a unique opportunity to move the Central Marin Ferry Connection Project forward, and there is significant historic, current, public and agency support for this effort.

Section 4(f) and The Bay Trail

While the current environmental document references moving the Bay Trail alignment to the west side of the freeway, this is not in keeping with the San Francisco Bay Trail's goal of a multi-use pathway adjacent to the shoreline. The proposed GCIP Bay Trail realignment creates a more circuitous route and relocates the trail further from the Bay. Additionally, the purpose of the above-referenced grant-funded study was to identify a Bay Trail alignment adjacent to the Bay. The railroad alignment was selected as the preferred alternative, and this is the alignment the Bay Trail would like to see move forward.

Redwood Highway should remain as a Bay Trail commute route and we are working with TAM to improve conditions for cyclists and pedestrians in that corridor. TAM is the lead agency for both Alternative 1B and 1C from the Central Marin Ferry Connection Study, and the GCIP is proposing a major transportation infrastructure project in this corridor. It is our hope that the development of Alternative 1C connecting to the railroad alignment and heading south to the Wornum curve can be included in the Greenbrae Corridor Interchange Project. Please see the attached map outlining the above referenced Bay Trail alignments.

The Bay Trail Project has always found TAM to be a receptive agency open to suggestions on even the largest and most complicated projects. The Greenbrae Corridor Interchange Project has been no exception. If you have any questions regarding the Bay Trail, please do not hesitate to contact me at (510) 464-7909 or by e-mail at maureeng@abag.ca.gov.

Sincerely,

Maureen Gaffney
Bay Trail Planner

Cc: Dianne Steinhauser, Transportation Authority of Marin
Bill Whitney, Transportation Authority of Marin

Ecnl: 1

Administered by the Association of Bay Area Governments

P.O. Box 2050 • Oakland, CA 94604-2050

Phone: 510-464-7900 • Fax: 510-464-7970

Web: www.baytrail.org

Via la Cumbre
Sir Francis Drake Blvd
101
Drakes View Circle
Corte Madera Creek
Bridge Alt 1C
CMFCP Bridge Alt 1B
450B
450A
Lucky Dr
Nellen Ave
Fifer Ave
Rich St
Industrial Way
Bay Trail (existing)
BT Commute Route
Commute/Recreational Connector
Recreational BT Route (Preferred Alignment)
X Remove BT Route

Philip Gioia
6 Chickasaw Court
Corte Madera CA 94925
E mail: baystgrp@earthlink.net

13 February 201

Dear Ms. Shearer:

I am a former Mayor and Council Member of Corte Madera, and take severe issue with the process and projected result of the project currently underway. THIS PROJECT REQUIRES A FULL ENVIRONMENTAL IMPACT REPORT.

Please acknowledge receipt of this comment letter to confirm that it is included in the public comment process. These comments apply to the Highway 101 Greenbrae/Twin Cities Corridor Improvements Draft Environmental Document.

The project will result in the following significant environmental impacts, which cannot be mitigated. The Negative Declaration is not appropriate. A full Environmental Impact Report (EIR) is required by law, and must be done.

1. Flyovers and 7 proposed soundwalls will create substantial massive visual intrusions on the existing scenic townscape, including but not limited to Corte Madera, Larkspur, and Greenbrae. The massive concrete structures will become a dominant landscape feature when looking down from the top of Mount Tamalpais, Marin's premier view spot, as the project area sits directly below East Peak.

2. Flyovers will create significant noise that will be detrimental to residents of the area, including residents of the Greenbrae Marina and Boardwalk, the Golden Gate and Marin Travel Trailer Parks, residents in hill areas of unincorporated Greenbrae above Sir Francis Drake Blvd., Madera Village Suites and the Best Western Hotel. Seven proposed sound barriers will do little to dampen noise, and will instead amplify and funnel noise into nearby and surrounding hillside neighborhoods.

3. Local traffic will continue to be adversely impacted, in particular during several years of construction, which will limit local mobility, especially on northbound Tamal Vista between Wornum and Fifer, and as drivers seek alternative routes and spillover onto local streets. Traffic already backs up Northbound on Tamal Vista for several hours each day during the Holiday shopping season from November to January, and at other times.

4. Bicycle and pedestrian routes will be more dangerous than the existing routes, as the Wornum Interchange will require crossing busy new ramp lanes and up to four signalized intersections close together on Wornum Drive.

5. Additional pavement will exacerbate existing flooding problems.

6. Relocation of bus stops will result in a path of travel that will be difficult for the disabled to use.

This project does not meet the stated goals of increased safety and reduced traffic congestion. The Draft Environmental Document is inadequate due to the following:

7. The project does not increase traffic capacity on Highway 101, and only reduces commute time by 1 min/20sec in the Southbound 101 direction and from 6-8 minutes in the Northbound 101 direction by the year 2035. This savings is hardly worth the $143 million price tag.

8. The proposed project does not increase traffic capacity on East and Westbound Sir Francis Drake, thus severe traffic congestion will continue to exist in both directions on this main thoroughfare.

9. Vehicular safety improvement is not demonstrated and traffic collision data in the document is inaccurate as it includes 150+ collisions with San Francisco addresses and 2 fatalities caused by medical conditions, not road conditions. The existing project area already has a below-average collision rate, as illustrated in Table 13 of the Traffic Operations Report.

10. This project does not adequately comply with "Complete Streets" concepts, which require transportation projects to serve all users, including cyclists, pedestrians and transit users.

11. There is no evidence that either Golden Gate Transit or Marin Transit will provide bus routes to serve transit riders at the four new bus stops in the Greenbrae Interchange.

12. There is inadequate analysis of parking impacts in areas where street-front parking is being eliminated, and there is no parking or safe drop-area at several bus stops.

13. There is inadequate analysis of impacts related to eliminating the existing Nellen Avenue, which serves as the street frontage and access to several longtime businesses.

14. There is inadequate analysis of visual impacts on the adjacent communities

15. There is inadequate analysis of noise impacts on the adjacent communities.

16. There is insufficient information about impacts to the community during the project construction period, which will include numerous and prolonged detours as well as installation of 273 piles (90 ft. long) through 75+ feet of bay mud.

17. There is insufficient analysis of impacts in or near Corte Madera Creek, including impacts on sensitive habitat, wildlife, and water quality.

18. There is inadequate analysis of population and traffic projections, which are outdated and inconsistent, especially in regard to recent growth forecasts issued by the State Department of Finance.

19. There is inadequate analysis of future growth in the adjacent area.

20. There is inadequate analysis of compliance with significant components of the Town of Corte Madera General Plan, the City of Larkspur General Plan and the Marin Countywide Plan.

21. There are not sufficient project alternatives for consideration in the OED.

<u>Cal Trans needs to change this project:</u>

22. Public opposition to the "Build" project is significant.

23. The "No Build" alternative has fewer adverse impacts than the "Build" project.

24. Less massive, less expensive and less drastic alternatives need to be considered.

25. The project does not address existing flooding and future sea level rise.

26. The proposed Wornum Interchange will create potentially dangerous conditions for pedestrians and bicyclists, many of them school-age children, and disabled persons who use it to travel between the West and East side of the Twin Cities and surrounding areas.

27. Local traffic needs a safe left turn option out of the Trader Joe/Cost Plus Plaza.

28. Congestion on East and West Sir Francis Drake Boulevard must be addressed, particularly as three eastbound lanes leading to Highway 580 and the Richmond-San Rafael Bridge shrink down to one lane, which is what causes the backup each weekday afternoon on Highway 101.

Philip J Gioia

Greenbrae Improvement Club
110 Greenbrae Boardwalk
Greenbrae, CA 94904

February 12, 2013

Caltrans District 4
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660
Via email to: Valerie Shearer, Environmental Planner, Valerie-Shearer@dot.ca.gov

Re: Highway 101 Greenbrae/Twin Cities Corridor Improvement Project

Dear MS. Shearer:

The Greenbrae Improvement Club , Inc is an association of homeowners and residents along the Greenbrae Boardwalk, adjacent to the project area. The community is comprised of 49 properties with approximately 100 residents along the southern shore of Corte Madera Creek. The project's proposed widening of the Northbound Highway 101 bridge and superstructure on the southern shore of Corte Madera Creek will result in the loss of part or all of a parking lot which we have leased from Caltrans for more than 15 years. The loss of these parking spaces is critical for our community. Our homes are located along a wooden boardwalk, without garages or parking. Residents park on the street or in community parking and move all household items to and fro with bicycles and hand carts. For this reason, dedicated parking spaces and storage areas for carts and bikes are a vital part of life here.

We were surprised to see no mention of this potential loss of parking in the project's Initial Study. In the sections 2.1 Community Cohesion; Section 2.2.3.1 Residential Property Acquisition, and Table 2.2-6, this parcel does not appear, nor is its use by our community cited. For these reasons, we are concerned with the project moving forward without an EIR.

We have not been able to obtain documentation of the amount of land that will be taken. However, we understand the highway structure will be widened at least 15 feet, which will clearly impact parking spaces in the parcel. We understand that the EIR process is intended to describe impacts of a proposed project and identify mitigation. For our community, these are missing in this document.

The Greenbrae Improvement Club, Inc, is a non-profit California corporation organized in 1949 as for mutual benefit to the Greenbrae Boardwalk. We lease Caltrans, Airspace Lot # FLA 4-MRN-101-024, with 41 paved parking spaces and 7 graveled spaces which we sub-lease to Boardwalk residents. The GIC also holds a 99 year lease from the County of Marin, for an adjacent parking lot containing 38 spaces. Public parking in the area is highly impacted, as it is used by boardwalk residents, employees at local businesses, and guests at the Marin RV Park.

The Greenbrae Boardwalk community is a historic community. Many of the homes were originally wooden arks brought to Corte Madera Creek in the years after 1906. In addition to leasing parking, the GIC maintains the wooden boardwalk, a community dock, landscaping of public areas.

As a pedestrian community, many of our residents make use of bicycle, transit and pedestrian facilities in the area. The proposed loss of the Nellen/Industrial Way pedestrian over-crossing will devastate our community by increasing our separation from schools, services and stores in Larkspur. In light of the area's access to GGBHTD buses and ferries and future SMART, as well as the expanded bicycle facilities (i.e. CalPark Tunnel and Sandra Marker Trail) the loss of this over-crossing seems shortsighted.

It is also unfortunate that the project does not address the opportunity to make the Tamalpais Drive 101 interchange safe for pedestrians, transit and bicycle access. It is hard to understand how this area could be overlooked in a project of this scope.

Sincerely,
Executive Committee
Greenbrae Improvement Club, Inc.
Fred Dupuis, President; Joyce Turner, Vice-President; Martha Jarocki, Treasurer;
Trustees: Kate Huber; Jerry Murphy; Gerry Jarocki; Margeigh Novotny; Laura Melendy; Jean Severinghaus

cc: Supervisor Steve Kinsey, Marin Co Board of Supervisors

Tyler Johnson
331 Willow Ave
Corte Madera, CA 94925

February 13, 2013

Comments on Greenbrae Interchange Environmental Report

Thank you for providing the opportunity to provide feedback on the Draft EIS.

Bicycle Related Comments

As a commuter from Corte Madera to San Francisco via the Larkspur Ferry I traverse this corridor twice each day on a bicycle. As things stand this is a great ride with the exception of several extremely dangerous sections such as Lucky and Fifer or Wornum and Redwood. Unfortunately, a ride is only as safe as the most dangerous portion. While the plan will improve many components of bicycle infrastructure in the area it will not result in many additional riders because it will still be too dangerous.

A few examples of things that would help:

- Major intersections like Wornum and Redwood should have no-right-on-red-lights. Currently drivers regularly take right turns without slowing or looking.
- Physical traffic calming measures to hold drivers speed to 25 mph on all approaches.
- Traffic lights for the Trader Joes parking lot – drivers regularly cross the sidewalk at high speeds as they lunge for an opportunity to enter traffic.

Scale Related Comments

The proposal is too massive. In particular the flyovers will alter the entire look and feel of the community.

Scope

The surrounding areas of the Greenbrae Interchange should be addressed in this proposal. For instance traffic on Sir Francis Drake, safe pedestrian/bike crossings at Feifer and Lucky, and the SMART/ ferry connection.

I think that as it stands the proposal has the feel of a giant freeway boondoggle from Los Angels. If there were genuine upgrades for surrounding communities there would be a lot more support.

Alternatives

I realize that the staff has been given many conflicting requirements and believe that the proposal is the only way to meet all goals. However, now that so many more citizens and officials are engaged in the process perhaps an additional round of planning meetings would be in order to present possible alternatives and tradeoffs.

SHUTE, MIHALY
& WEINBERGER LLP

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LAUREL L. IMPETT, AICP
Urban Planner
impett@smwlaw.com

February 13, 2013

Via Federal Express and E-Mail

Valerie Shearer
Senior Environmental Planner
Caltrans, District 4
Office of Environmental Analysis
320 22nd Street, MS-8B
Oakland, CA 94612

Valerie_Shearer@dot.ca.gov

Re: Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Initial Study/Environmental Assessment

Dear Ms. Shearer:

On behalf of the Marin Audubon Society ("Audubon"), we submit these comments on the "Initial Study with Negative Declaration/Environmental Assessment ("IS/EA") for the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement Project ("Project"). The Project proposes significant modifications to U.S. Highway 101 ("Hwy 101"), between Tamalpais Drive in the Town of Corte Madera, and Sir Francis Drake Boulevard in the City of Larkspur. Certain components of the Project would affect Corte Madera Creek, the Creek's tide channels, grasslands, tidal salt marsh and other wetlands. These waterways and habitats support numerous special-status wildlife species, including California clapper rail, California black rail, Salt marsh harvest mouse, Central California coast steelhead, Central California coast salmon, and North American green sturgeon.

While Audubon recognizes there may be a valid need for the proposed Project, it is deeply concerned that the Project's environmental impacts will be more significant than acknowledged in the IS/EA. In our opinion, the IS/EA misleads the

public and decision-makers by implying that these transportation improvements must come at the expense of the environment. This is simply not the case. Indeed, we are aware of other situations where Caltrans is using its highway improvements as an *opportunity* for enhanced environmental mitigation.

Similar to the proposed Project to improve the Hwy 101 corridor in Marin County, Caltrans' North Coast Corridor Project ("NCC Project") includes bridges, new ramps and auxiliary lanes along the I-5 corridor in San Diego County. *See* Interstate 5 North Coast Corridor Project, Supplemental Draft EIR/EIS, U.S. Department of Transportation and Federal Highway Administration and Caltrans, August 2012, excerpts attached as Exhibit A. Recognizing the extraordinary resources that would be impacted by the NCC Project, Caltrans' NCC Resource Enhancement Program ("REP") calls for enhancing marine and environmentally sensitive habitat areas by strategically acquiring restoration opportunities. According to Caltrans, "The REP provides the planning and implementation framework to ensure the most valuable, high quality mitigation opportunities in the North Coast Corridor are identified, secured, and prioritized for implementation in a manner that cost-effectively utilizes available mitigation funding to maximize benefits to the corridor's natural resources." *Id.* To this end, Caltrans proposes to establish an endowment to increase the capacity for long-term stewardship of San Diego's coastal resources for the foreseeable future. *Id.* Given the extraordinary resources in and around the proposed Project site, Caltrans should proactively seek enhanced mitigation opportunities to minimize the Project's extensive environmental impacts.

As discussed below, in the Marin Audubon Society letter (submitted under separate cover) and in the reports prepared by Leonard Liu, avian biologist, and Mike Podlech, aquatic ecologist, the IS/EA neither accurately identifies or analyzes the extensive direct and indirect impacts to the sensitive habitats and species that will accompany the Project. *See* Liu Report, attached as Exhibit B, and Podlech Report, attached as Exhibit C. The IS/EA relies on an artificially restricted biological study area ("BSA") that focuses only on the area of disturbance or construction footprint. The area that would be disturbed by the construction and operation of the Project is, of course, part of a larger ecological system with conservation importance for threatened and endangered species recovery. Consequently, the IS/EA understates the extent of impacts on sensitive habitats and the many species that have been reported to occur within the BSA or adjacent to the Project site in essentially identical or highly similar habitats.

Even within the BSA, the IS/EA fails to conduct the necessary presence/absence surveys for numerous sensitive species. The document fails to provide

any analysis of impacts to the many migratory birds that rely on the BSA and the larger Corte Madera Creek habitat. The IS/EA only considers impacts to the California clapper rail and the California black rail during breeding season, and fails altogether to explain how the placement of permanent structures and shading of the Creek will impact plant and animal resources.

Nor does the IS/EA disclose the Project's potential to severely impact the numerous threatened and endangered fish within and adjacent to the study area. Its treatment of impacts to fish from underwater pile driving is particularly disingenuous, asserting only that the noise from these activities may cause stress. Yet, as discussed below, Caltrans' own studies confirm that underwater pile driving has all sorts of physical effects on fish including hearing loss, reduced fitness, reduced success in locating prey, inability to communicate, physical injury and mortality.

The mitigation measures the IS/EA relies on are vague, deferred and unenforceable. For example, the Project would result in the fill of waters of the U.S. and San Francisco Bay Conservation and Development Commission ("BCDC"), yet the IS/EA lacks the evidentiary support that these impacts would be sufficiently mitigated. Nor does the document provide meaningful mitigation for the Project's direct and indirect impacts to threatened and endangered birds, fish and other sensitive species.

The IS/EA's failure to adequately analyze and mitigate the Project's impacts renders it inadequate under both the California Environmental Quality Act ("CEQA")[1] and the National Environmental Policy Act ("NEPA").[2] In the absence of an enforceable and proven plan for mitigation for the extensive significant impacts, there remains more than a fair argument that the Project will have significant environmental effects not analyzed or acknowledged in the IS/EA. For these reasons, it is our opinion that Caltrans may not approve the proposed Project without first preparing an environmental impact report ("EIR"). Only then will Caltrans have the opportunity to meaningfully consider alternatives that could avoid the project's significant impacts.

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[1] *See* Pub. Res. Code § 21000 et seq. (hereinafter "CEQA") and 14 Cal. Code Regs. § 15000 et seq. (hereinafter "Guidelines").

[2] *See* 42 U.S.C. § 4321 et seq. and 40 C.F.R. § 1500 et seq.

I. Legal Standard

It is well settled that CEQA establishes a "low threshold" for initial preparation of an EIR, especially in the face of conflicting assertions concerning the possible effects of a proposed project. *Pocket Protectors v. City of Sacramento*, 124 Cal. App. 4th 903, 928 (2005). CEQA provides that a lead agency may issue a negative declaration and avoid preparing an EIR *only* if "[t]here is no substantial evidence, in light of the whole record before the lead agency, that the Project may have a significant effect on the environment." CEQA § 21080(c)(1). An initial study must provide the factual and analytic basis for an agency's determination that no significant impact will result from the project. Guidelines § 15063(d)(3).

An agency must prepare an EIR whenever it is presented with a "fair argument" that a project may have a significant effect on the environment, even if there is also substantial evidence to indicate that the impact is not significant. *No Oil, Inc. v. City of Los Angeles*, 13 Cal. 3d 68, 75 (1974); Guidelines § 15064(f)(1). Where there are conflicting opinions regarding the significance of an impact, the agency must treat the impact as significant and prepare an EIR. Guidelines § 15064(f)(1); *Stanislaus Audubon Soc'y v. County of Stanislaus*, 33 Cal. App. 4th 144, 150-51 (1995).

Further, where the agency fails to study an entire area of environmental impacts, deficiencies in the record "enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences." *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296, 311 (1988). In marginal cases, where it is not clear whether there is substantial evidence that a project may have a significant impact and there is a disagreement among experts over the significance of the effect on the environment, the agency "shall treat the effect as significant" and prepare an EIR. Guidelines § 15064(g); *City of Carmel-By-The-Sea v. Board of Supervisors,* 183 Cal.App.3d 229, 245 (1986). Given this standard, an EIR is required for this Project.[3]

Similarly, NEPA requires federal agencies to prepare an Environmental Impact Statement ("EIS") for all "major Federal actions significantly affecting the quality of the human environment." 42 U.S.C. § 4332(2)(C). While an environmental

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[3] Although it is our unwavering legal opinion that Caltrans must prepare an EIR for this Project, if Caltrans decides to rely on the MND, but modify the Project or adopt additional mitigation measures, Caltrans must, at the very least, recirculate the MND for further public review and comment. Guidelines § 15073.5.

assessment is an appropriate tool to determine, as an initial step, whether the Project might have any significant environmental effects (*see National Parks and Conservation Ass'n v. Babbitt*, 241 F.3d 722, 730 (9th Cir. 2001); 40 C.F.R. § 1501.3), a far more detailed EIS is required if there are "substantial questions" as to whether the project "*may* have a significant effect upon the human environment." *Foundation for North American Wild Sheep v. USDA*, 681 F.2d 1172, 1178 (9th Cir. 1982); 40 C.F.R. § 1501.4.

As discussed below and described in more detail in the attached experts' reports, there is a fair argument that the proposed Project will have potentially significant environmental impacts.

A. The IS/EA is Legally Inadequate Because it Fails to Include a Valid Description of the Project.

"An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus*, 27 Cal.App.4th 713, 730 (1994), quoting *County of Inyo v. City of Los Angeles*, 71 Cal.App.3d 185, 193 (1977). As a result, courts have found that, even if an EIR is adequate in all other respects, the use of a "truncated project concept" violates CEQA and mandates the conclusion that the lead agency did not proceed in a manner required by law. *San Joaquin Raptor*, 27 Cal.App.4th at 730. Furthermore, "[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." *Id.* (citation omitted). Thus, an inaccurate or incomplete project description renders the analysis of significant environmental impacts inherently unreliable.

Here, the IS/EA omits fundamental details about the Project that are necessary to evaluate potential environmental impacts. For example, although the Project's construction process will be extensive – and this construction has the potential to impact numerous threatened, endangered and other sensitive species – the IS/EA fails to include even the most rudimentary detail about the construction activities and operations. Indeed, the document fails to include the following information about the Project's construction activities, which are expected to severely impact nearby animals:

- Scaled drawings that include the water depth in profile view and the channel width in plan view;

- The pile driving schedule for each construction phase. Estimation of the number of piles that are anticipated to be driven in a day and how many hours of pile

driving are expected in a day. This schedule should be specific to the duration of all in-water and near-shore (within 25 meters of shore) pile driving activity.

- Identification of whether impact hammer, vibratory, or other type of hammer would be used to drive piles; specify the approximate size of hammer;
- The size of piles to be driven during each phase, and any actions such as the need for splicing or welding pile sections);
- Estimation of the number of strikes per pile by pile type/size; and,
- Discussion of the duration of activities between each pile drive (e.g., does the driver need to be repositioned between each drive).

Until this information is identified, it is not possibly to evaluate Project impacts or develop appropriate mitigation.

II. The IS/EA's Description of the Project Setting is Inadequate.

CEQA requires an environmental document EIR to adequately describe the baseline conditions on the project site. Guidelines § 15125. "Without a determination and description of the existing physical conditions on the property at the start of the environmental review process, the document cannot provide a meaningful assessment of the environmental impacts of the proposed project." *Save Our Peninsula Committee v. Monterey Bd. of Supervisors* 87 Cal.App.4th 99, 119 (2001). Decision makers must be able to weigh the project's effects against "real conditions on the ground." *City of Carmel-by-the-Sea v. Board of Supervisors*, 183 Cal. App. 3d 229, 246 (1986). In the context of biological resources, where baseline conditions related to rare or elusive species can be difficult to determine, an agency has a duty to make an effort to disclose all that it reasonably can. *San Joaquin Raptor/Wildlife Rescue Ctr.*, 27 Cal.App.4th at 725 (overturning EIR that inadequately investigated the possibility of wetlands on the project site). Here, however, the IS/EA's description of the Project setting omits essential information and therefore prevents meaningful analysis of the Project's environmental impacts.

A. Inadequate Study Area

As the Liu Report explains, the IS/EA defines the BSA too narrowly and therefore does not include habitat that likely would be affected by construction activities.

For example, Shorebird Marsh is immediately adjacent to the on-and off-ramps proposed for construction at Wornum Drive. Hundreds of migratory shorebirds use Shorebird Marsh as a roost (PRBO Conservation Science, unpubl. data). The Corte Madera Marsh Ecological Reserve ("CMER" or ("Reserve") is less than 500' from the proposed Hwy 101 northbound Sir Francis Drake Drive off-ramp. The Reserve has one of the highest densities of California clapper rail ("CCR")(*Rallus longirostris obsoletus*) in the San Francisco Bay Estuary (Liu et al. 2009), and also supports California black rail (*Laterallus jamaicensis coturniculus*), and salt marsh harvest mouse (*Reithrodontomys raviventris*). *See* Liu Report and attachments. The fringe marshes and mudflats along Corte Madera Creek provide valuable dispersal and foraging habitat for CCR, linking the Reserve with upstream Piper Park and Creekside Park. Given the Project's proximity to Shorebird Marsh, the Reserve and the fringe marshes and mudflats of Corte Madera Creek, and the potential for construction of the Project to impact bird populations in these habitats, Caltrans should have included these areas within in BSA. Because the IS/EA does not acknowledge these adjacent habitats, it does not evaluate the consequences of disrupting the connectivity between wildlife populations during Project construction.

B. Plant Species

Nine special-status plant species are known to occur in the region. *Id.* at 2.4-13. *See* IS/EA Natural Environment Study ("NES")Table 3-2. Despite the area's potential to support rich botanical resources, Caltrans relies on outdated botanical surveys and concludes that no special-status plants occur within the study area. Surveys were conducted more than four years ago (2008) and with the exception of salt marsh-specific surveys, were conducted in only one year. IS/EA at 2.4-13 and NES Table 3-2. According to the California Department of Fish and Wildlife ("CDFW"), conducting surveys in one single year may result in a negative finding. *See* Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities, California Natural Resources Agency, November 24, 2009 at 4, 5, attached as Exhibit D. The failure to locate a known special status plant occurrence during one field season does not constitute evidence that this plant occurrence no longer exists at this location, particularly if adverse conditions are present. As CDFW explains, surveys over a number of years may be necessary if the species is an annual plant having a persistent, long-lived seed bank and is known not to germinate every year. *Id.* Visits to the site in more than one year increase the likelihood of detection of a special status plant especially if conditions change. To further substantiate negative findings for a known occurrence, a visit to a nearby reference site may ensure that the timing of the survey was appropriate. *Id.* Because the IS/EA relies on inadequate botanical surveys, it has no basis to conclude that the Project will not result in significant impacts to sensitive plants.

C. Animal Species

The IS/EA acknowledges that 27 special-status wildlife species have the potential to occur in the BSA. IS/EA at 2.4-14. The document does not, however, include the necessary detail about these species, such as their population size, distribution or history of movement patterns. Nor did Caltrans conduct surveys for the vast majority of these species.[4] As the Liu Report explains, surveys are critical to understanding the size and distribution of each species' population, migratory periods, the species use of the habitat (e.g., foraging and breeding details), and activity levels. Sufficient information about each species, within and adjacent to the BSA, that will be potentially disturbed by the Project is a fundamental prerequisite to effectively assessing potential impacts and guiding the development of avoidance, minimization, and mitigation measures.

The following special status migratory birds have the potential to occur in the BSA: California brown pelican, Great egret (*Ardea alba*), Great blue heron (*Ardea herodias*), Northern harrier (*Circus cyaneus*), snowy egret (*Egretta thula*), whitetailed kite (*Elanus leucurus*), saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*), California black rail (*Laterallus jamaicensis coturniculus*), Alameda song sparrow (*Melospiza melodia pusillula*), San Pablo song sparrow (*Melospiza melodia samuelis*), black-crowned night heron (*Nycticorax nycticorax*), double-crested cormorant (*Phalacrocovax auritus*), and California clapper rail (*Rallus longirostris obsoletus*). IS/EA at 2-4-15. Because Caltrans conducted no surveys to determine their presence or absence, it is impossible to determine the habitat resource value of the BSA or adjacent areas.

Nor as discussed below, does the IS/EA provide sufficient information regarding the water bodies that would be affected by the Project or the sensitive fisheries that are present in these water bodies. For example, as regards Corte Madera Creek, the IS/EA fails to include critical details such as drainage width, depth, and approximate flow. As for fisheries, the IS/EA simply asserts that numerous special-status fish occur in the area, but it does not describe the historical and current fish presence, their life history traits (e.g., spawning, rearing, and migration), or the types of habitat present, particularly if there are areas where fish congregate within the water bodies.

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[4] The IS/EA's technical appendix refers to a survey for clapper rail conducted for the proposed Project and the Central Marin Ferry Connection Project.

An adequate and accurate description of the Project setting, including the information listed above, must be the basis for impact analysis and the identification of feasible mitigation measures.

III. Caltrans Must Prepare an EIR That Analyzes the Potentially Significant Effects of the Proposed Project.

An agency must prepare an EIR for a proposed project whenever substantial evidence in the administrative record supports a "fair argument" that the project may have significant impacts on the environment. Guidelines §§ 15064(a)(1), (f)(1). For the reasons discussed below, a fair argument clearly can be made that the Project will result in Project-specific and cumulative environmental impacts.

A. The IS/EA Fails to Adequately Analyze Impacts to Wetlands and Northern Coastal Salt Marsh Habitats, and These Impacts Are Likely to Be Significant.

The IS/EA concedes that the Project will have significant impacts relating to the loss of wetlands and the loss of northern coastal salt marsh habitat ("NCSM"). IS/EA at 2.4-7, 8. However, as discussed below, the document fails to adequately identify or analyze these impacts and fails to propose feasible mitigation. Consequently, the IS/EA lacks the evidentiary support to conclude that these significant impacts would be mitigated.

First, the IS/EA underestimates the Project's impacts on wetlands because it includes in the BSA only the area of ground disturbance. IS/EA at 2.4-1. Although the wetlands that will be directly disturbed by the Project are part of a larger hydrologic system, the IS/EA does not consider the Project's impacts on the integrity of the entire wetland function. Indeed the document acknowledges the hydrologic connection between wetlands within and outside the BSA (at 2.4-9, 10), but stops short of identifying or analyzing how changes to the hydrologic functions within the BSA will affect adjoining wetlands, or the animals that rely on them. Caltrans must comprehensively identify all of the habitats, including wetlands, marshes, creek and lagoons that could be potentially impacted by the proposed Project. This inventory should be presented in tabular and graphic formats.

Second, the IS/EA lacks the evidentiary support to conclude that the Project's impact on wetlands would be mitigated to a less than significant level. As discussed below, the document identifies mitigation to offset impacts to waters of the U.S. Army Corps of Engineers' ("USACE"). However, the IS/EA identifies no

mitigation for the impacts to fill as defined by BCDC. The segment of Corte Madera Creek in the BSA falls under BCDC's Bay jurisdiction, which defines fill differently than the USACE. *Id.* at 2.4-9. Under the BCDC definition of fill, the Project would impact an additional 0.31 acres (13,638 square feet) of additional permanent surface area "fill" and 0.5 acres (21,780 square feet) of additional temporary surface area "fill" placed on pilings over Corte Madera Creek; and 22,619 cubic feet of permanent displaced volume "fill" (assuming 16 inch diameter, 90 foot long piles) and 64,179 cubic feet of temporary displaced volume "fill" (assuming 24 inch diameter, 90 foot long temporary piles). *Id.* at 2.4-9. Despite this increase in BCDC fill amounts, the IS/EA only includes mitigation for USACE fill. *See* Mitigation Measure Bio-1 Restoration of Wetland Habitat at 2.4-11. In the absence of mitigation measures for the loss of wetlands as defined by BCDC, the Project's impacts to wetlands are significant.

In addition, the IS/EA defers the formulation of mitigation related to waters of the U.S. The document simply asserts that Caltrans should work with USACE, United States Fish and Wildlife Service ("USFWS") and CDFW to establish mitigation measures to offset impacts to waters of the U.S. *Id.* at 2.4-11. The IS/EA provides no detail about this measure other than calling for the restoration or creation of wetlands at a 1:1 ratio. It fails to: (1) explain why alternative designs were not considered that would avoid wetlands altogether; (2) explain how a mitigation ratio of 1:1 would adequately mitigate for the loss of wetlands, when these wetlands function as habitat for endangered and threatened species; (3) identify the location of wetlands to be restored and the specific nature of the wetland creation or restoration efforts; and (4) describe how the created or restored wetlands would replace the functions lost as a result of the proposed Project. California courts have determined that agencies cannot rely on the presumed success of mitigation measures that have not been formulated at the time of project approval, and any determination that a significant impact would be reduced below significance based on deferred analysis and mitigation is invalid. *See Sundstrom*, 202 Cal. App. 3d at 306-307; *Oro Fino Gold Mining Corporation v. County of El Dorado* 225 Cal. App. 3d 872, 885 (1990).

Third, the IS/EA acknowledges that the Project would result in indirect impacts from increased shading (at 2.4-9), but fails to actually analyze the effect that shading would have on species. Nor does the IS/EA provide any mitigation for this significant impact.

Finally, the IS/EA includes a mitigation measure calling for the reseeding or replanting of NCSM along the banks of Corte Madera Creek. *Id.* at 2.4-12. This measure would not, however, reduce impacts to salt marsh habitat to a less than significant level. Indeed, the IS/EA concedes that overall habitat quality would not return

to preconstruction conditions for a few years and "would not provide the essential habitat components necessary to support special-status species for several years after the initial disturbance." *Id.* 2.4-7. Inasmuch as NCSM is habitat for numerous sensitive species including the California clapper rail, California black rail, and the Salt marsh harvest mouse (*see* IS/EA at Figure 2-17), it is critical that the loss of this habitat be mitigated before construction begins in order to minimize negative effects and improve habitat connectivity. Moreover, such mitigation must be at a 2:1 ratio. A 1:1 ratio of wetland mitigation is not sufficient for NCSM loss that is endangered species habitat. Mitigation should be of the same habitat type, and as close as possible to the site of loss, i.e. in the lower creek near its mouth. Mitigation should include restoration of the creek bank edge to viable clapper rail habitat to allow them to move along the banks while hiding from predators.

Thus, because the IS/EA relies on vague and unenforceable mitigation measures to reduce the Project's significant impacts to wetlands and NCSM, Caltrans lacks the evidentiary basis to conclude that impacts would be mitigated to a less than significant level.

B. The IS/EA Fails to Adequately Identify or Analyze the Project's Impact on Animal Species, and These Impacts Are Likely Significant.

1. Significant, Adverse Impacts to Special-Status Birds.

As discussed above, the IS/EA acknowledges that numerous bird species have the potential to occur within the BSA. The BSA and adjacent areas provide habitat for the California clapper rail and California black rail, yet the document provides scant attention to these two species. Indeed, as the Liu Report explains, the IS/EA's discussion of impacts to these two bird species focuses solely on the breeding season.

The IS/EA also fails to disclose potential impacts to migratory birds. As discussed above, the document acknowledges that the BSA provides habitat for numerous migratory birds, but Caltrans has not conducted any surveys for these birds. Nor does the IS/EA include any discussion of these birds (e.g., their populations, whether they roost on or near the BSA, or their migratory patterns). Adequate information about *each* species that will be disturbed by the Project is a fundamental prerequisite to effectively assess potential impacts and guide the development of avoidance, minimization, and mitigation measures.

Notwithstanding the IS/EA's failure to provide this fundamental background information, the document admits that direct impacts to migratory bird habitat is anticipated due to tree trimming and removal, construction activities, the placement of permanent structures within the study area, increased shading over Corte Madera Creek, and because of impacts to NCSM. IS/EA at 2.4-16. Yet, other than an estimate of the number of trees that would be removed as a result of the Project, the IS/EA fails to actually analyze the Project's impacts on these bird species. Indeed, even as regards the loss of trees, the IS/EA does not commit to a specific number. Instead, the document asserts that "an *estimated* 254 trees *may* be impacted." *Id.* (emphasis added). We question why Caltrans cannot identify the precise number of trees that would be removed or trimmed in a manner that would adversely impact bird species, inasmuch as studies in the IS/EA technical appendix identify each tree by number. *See* Appendix B.

Nor does the IS/EA provide *any* analysis of the impacts to bird species from the placement of permanent structures within the study area or from the shading of the Creek. The document also does not evaluate the change in noise from the realigned highway and ramps. Meaningful analysis of impacts effectuates one of CEQA's fundamental purposes: to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." *Laurel Heights Improvement Ass'n v. Regents of the University of California*, 6 Cal.4th 1112, 1123 (1993) (*Laurel Heights II*). To accomplish this purpose, an EIR must contain facts *and* analysis, not just an agency's bare conclusions. *Citizens of Goleta Valley v. Board of Supervisors,* 52 Cal.3d 553, 568 (1990).

The IS/EA also fails to disclose impacts relating to construction activities on the numerous sensitive bird species in and around the BSA. The effects of pile driving are discussed only in the context of California clapper rail and California black rail, and even this analysis is buried in a technical appendix. CEQA requires that the analysis be presented in the IS/EA, not a technical appendix. See *Santa Clarita Organization for Planning the Environment v. County of L.A.* 106 Cal.App.4th 715, 722 (2003) (agency's analysis must be contained in the EIR, not "scattered here and there in EIR appendices"). Decision-makers and the general public should not be forced to sift through obscure minutiae or appendices in order to ferret out the fundamental assumptions that are being used for purposes of the environmental analysis." *San Joaquin Raptor Rescue Center*, 149 Cal.App. 4th at 659; see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442 ("The data in an EIR must not only be sufficient in quantity, it must be presented in a manner calculated to adequately inform the public and decision makers, who may not be previously familiar with the details of the project.")

The IS/EA (and its technical appendix) fail to provide *any* analysis of construction-related noise activities –including pile driving – to the sensitive bird species other than clapper and black rail. We can find no logical explanation for this omission. Certainly elevated noise levels associated with equipment such as pile driving, concrete demolition/crushing, saws, pumps, and excavators would be expected to adversely impact all birds, not just the clapper rail and black rail. *See* Technical Appendix G for a discussion of typical noise levels associated with construction activities. As the Liu Report states, each species is differentially susceptible to noise due to their unique evolution. An EIR must be prepared to analyze the significant impacts to all sensitive bird species from the entire Project.

2. Proposed Mitigation Is Inadequate to Reduce Impacts to a Level of Insignificance.

The IS/EA's approach to mitigation for the Project's impact on sensitive bird species is legally deficient and provides no justification for its conclusion that the measures would reduce Project impacts to a less than significant level. First, the document fails to identify adequate mitigation for the loss of habitat. By the IS/EA's own admission, the Project would directly impact almost eight acres of habitat. This impact is significant, particularly as many of the Project's sensitive bird species rely on this habitat for foraging and possibly nesting and roosting. Yet, the IS/EA calls for only 1.4 acres of native trees to be replaced within the Caltrans' right-of-way. *Id.* at 2.4-18. The document never explains how this nominal tree replacement would sufficiently reduce impacts to sensitive species to a less than significant level.

Second, the IS/EA does not propose adequate mitigation for the loss of trees. The document states that the Project "may" result in the removal of 254 trees. IS/EA at Tables 2.4-4, 2.4-5 and page 2.4-16. The impacted trees include 172 trees located within the Caltrans right-of-way, while the remaining trees are located in Corte Madera, Larkspur and the County. *Id.* at 2.4-16 and 17. Yet, rather than mitigate for all 254 trees, Caltrans would replace only 1.4 acres of native trees, since, according to Caltrans, 172 potentially impacted trees are equal to roughly 1.4 acres of tree canopy crown cover. *Id.* at 2.4-18. Caltrans' proposed mitigation does not even replace trees at a 1:1 ratio. Certainly, given the importance of the habitat, the trees should be replaced at a ratio of 2:1.

Third, the IS/EA does not commit to a schedule for the replanting of trees. Since overall habitat quality would not return to preconstruction conditions for a few years, restoration efforts will not provide suitable habitat for at least several years once

implemented. Clearly, the loss of this habitat, especially coupled with prolonged construction operations, would all but ensure that birds will abandon this area. Accordingly, replacement habitat should be secured and *fully functional* prior to the commencement of construction. The EIR must include a habitat and tree replacement plan that: (1) identifies the location for replacement habitat and trees; (2) commits to a 2:1 replacement ratio; and (3) ensures that habitat is replaced with native vegetation and trees, prior to the start of Project construction. This Plan should be prepared by an independent consultant with expertise in terrestrial restoration and approved by CDFW.

Fourth, a measure calling for construction activities to occur outside migratory bird nesting season is also entirely inadequate. The IS/EA calls for avoiding shrub and tree trimming and/or removal outside the nest season which the document states occurs generally between February 1 and August 31st (hereinafter "construction avoidance period"). IS/EA at 2.4-18. The document immediately back pedals though when it asserts that if shrub and tree removal is scheduled to occur during nesting season a qualified wildlife biologist will conduct preconstruction surveys. The end result is measure that would, in no way, prevent construction activities from occurring within the nesting seasons of migratory birds. Moreover, at a minimum the construction avoidance period must be extended by two weeks; i.e., the avoidance period should be between January 15 (not January 31) and September 1 as territorial vocalizations related to breeding begin to intensify by mid-January (Liu et al. 2012).

Fifth, the IS/EA includes a measure calling for the avoidance of impact pile driving activities located within 800 feet of the Corte Madera Marsh Ecological Reserve, or any other known active California clapper rail breeding habitat during the will occur during the construction avoidance. *Id.* at 2.4-28. Once again, the document states that if pile driving must occur during this period, then full protocol-level surveys will be conducted during the breeding within the year construction activities are proposed. *Id.* at 2.4-28. Here too, the IS/EA lacks the necessary evidentiary data to support the conclusion that impacts to sensitive bird species would be reduced to insignificant levels. The measure does not even specifically identify the clapper rail breeding habitat that would purportedly be protected from impact pile driving. Rather it uses phrases such as "*any other known* active California clapper rail breeding habitat." *Id.* emphasis added. Nor does it prohibit pile driving from occurring within clapper rail habitat since it allows for the option of pre-construction surveys. In addition, the measure only places restrictions on "impact" pile driving. It does not place any restrictions on when or where "vibratory" pile driving or any other construction activity can occur. Vibratory pile driving is only slightly quieter than impact driving (96 compared to 101 decibels at 50 feet) and various other construction-related noise levels routinely exceed 80 to 90

decibels at 50 feet. Technical Appendix G at 8. Consequently, according to the IS/EA's Technical Appendix, "it can be inferred that impact driving that occurs within 800 feet of black rail or clapper rail during the breeding season would be considered an adverse effect on these birds, and may result in take." *Id.* Furthermore, because the mitigation measure is designed exclusively to address impacts to clapper rail and black rail, there is no indication it would address impacts to the remaining sensitive bird species. Protocol level surveys for clapper rail may not necessarily detect other migratory bird species.

In sum, the Project would result in significant impacts to sensitive bird species. The mitigation measures are vague and unenforceable and the IS/EA provides no evidence that they will be sufficient to reduce impacts to a less than significant level.

3. Significant, Adverse Impacts to Special-Status Fish

The CEQA Guidelines state that a Project would normally have a significant impact if it would: (a) have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species; or (b) interfere substantially with the movement of any native resident or migratory fish or wildlife species. Appendix G at IV (a), (d). Here, the Corte Madera Creek has been designated as critical habitat for several special-status fish including the Central California Coast Steelhead (federally threatened), Central California Coast Coho Salmon (federally endangered), North American Green Sturgeon (federally threatened), and Central Valley (Sacramento River Winter-Run) Chinook Salmon (federally endangered). IS/EA at 2.4-20, 21. In addition, the Corte Madera Longfin Smelt (California threatened) may be found in Corte Madera Creek. *Id.*

The IS/EA concedes that fish may be directly impacted from underwater noise created by impact pile driving. *Id.* at 2.4-23. Inasmuch as pile driving would occur within and directly adjacent to Corte Madera Creek, we concur that Caltrans has no choice but to label these impacts as significant. Yet it is Caltrans' cavalier approach to discussing these impacts that we find the most disturbing. Indeed, the IS/EA provides only the most cursory discussion of the Project's "temporary" and long term effects on fish species. The document never discloses that pile driving, for example, may lead to serious injury and even death. Such an omission is particularly disingenuous inasmuch as Caltrans has conducted extensive studies on the effects of pile driving on fish and has even prepared guidance for identifying and mitigating pile driving impacts. *See* Technical Guidance for Assessment and Mitigation of the Hydroacoustic Effects of Pile Driving on Fish ("Caltrans Guidance"), February 2009 at 1-1, attached as Exhibit E. The Caltrans Guidance explains the potential effects of pile driving on in fish:

> Exposure to low levels of sound for a relatively long period of time, or exposure to higher levels of sound for shorter periods of time, may result in auditory tissue damage (damage to the sensory hair cells of the ear) or temporary hearing loss—referred to as a "temporary threshold shift" (TTS). The level and duration of exposure that cause auditory tissue damage and TTS vary widely and can be affected by factors such as repetition rate of the sound, pressure level, frequency, duration, size and life history stage of the organism, and many other factors. Guidance at 3-3.

The Guidance further explains that indirect effects of hearing loss in fish may result in their reduced fitness, which may in turn increase the animal's vulnerability to predators and result in their inability or reduced success in locating prey, inability to communicate, or inability to sense their physical environment. In certain instances, the range of effects of pile driving include physical injury and mortality. *Id.* at 3-1, 3-3 and 4-22.

Given the severe impacts to fish that can accompany pile driving and the extraordinary fishery resources in the Corte Madera Creek, one would expect the IS/EA to provide a detailed evaluation of these impacts. Unfortunately, the IS/EA does no such thing. As the Caltrans' Guidance clearly shows, the IS/EA lacks even the most basic information to evaluate the severity and extent of the Project's impacts:

- **Environmental setting**: Identification of the drainage width, depth and approximate flow of Corte Madera creek; and the types of habitat present within the BSA, particularly if there are areas where fish could congregate. *See* Caltrans Guidance, Table 4-2: Information Needed for Evaluation of In-Water Pile Driving Effects on Listed and Other Fish Species.

- **Fish Presence:** Identification of life history stages, and habitat types; historical and current fish presence, their life history stages, and habitat type in the BSA. Indicate the listed species that could occur in the vicinity of the Project and their life history traits (e.g., spawning, rearing, and migration). Include documented migration periods and in-water work windows approved by NOAA Fisheries, USFWS, and CDFW. *Id.*

- **Detail of pile work in channel**: Provide scaled drawings that include the water depth in profile view and the channel width in plan view. Illustrate the

approximate locations of temporary and permanent piles. Indicate the location and distance of piles not driven in water to ordinary high water. Identify whether impact hammer, vibratory, or other type of hammer would be used to drive piles. Identify whether pre-drilling would be used. Specify the approximate size of hammer, if the information is available. *Id.*

- **Schedule**: Indicate the total project schedule, as well as construction phases and the pile driving schedule (discuss for all phases: what piles would be driven, when piles would be driven, the size of piles to be driven during each phase, and any actions such as the need for splicing or welding pile sections). For bioacoustic analyses, the pile driving schedule should be specific to the duration of all in-water and near-shore (within 25 meters of shore) pile driving activity. *Id.*

- **Number of strikes:** Estimate the number of strikes per pile by pile type/size (engineer's estimate). Provide a conservative estimate of the number of piles that are anticipated to be driven in a day (i.e., estimate the number on the highside) and how many hours of pile driving are expected in a day. Include a discussion of the duration of activities between each pile drive (e.g., does the driver need to be repositioned between each drive. Do pile sections need to be welded before continuing the driving?) The time between driving events can affect sound exposure level calculations. *Id.*

- **Sound Estimates**: Estimate the sound generated from each pile type/size with attenuation (if used). Sound monitoring has been conducted for numerous pile driving projects. *Id.*

- **Estimate Fishery Effects:** Estimate the habitat area of listed and other species possibly affected by pile driving-generated noise (include sound attenuation if included in the project). *Id.*

As the Caltrans Guidance makes clear, analysis of the Project's effects on fish and their habitat is not only feasible, but appears to be commonly performed in CEQA documents. *Id.* at 4-3. Absent this information and analysis, the IS/EA fails to provide the public and decision-makers with essential information about the Project. Caltrans must provide this analysis in an EIR. Equally important, a comprehensive analysis of the Project's expected effects on fishery resources is a critical first step toward identifying feasible mitigation. As discussed below, the mitigation measures identified in the IS/EA are woefully inadequate.

4. Proposed Mitigation Is Inadequate to Reduce Impacts to Special-Status Fish to a Level of Insignificance.

Notwithstanding the IS/EA's failure to adequately analyze the Project's noise impacts on fish species, the document nonetheless recognizes the need to mitigate for these significant impacts. IS/EA at 2.4-25. Yet, the proposed mitigation measures simply do not and cannot reduce to insignificance the severe impacts caused by the Project. When a lead agency relies on mitigation measures to find that project impacts will be reduced to a level of insignificance, there must be substantial evidence in the record demonstrating that the measures are feasible and will be effective. *Sacramento Old City Assn. v. City Council of Sacramento*, 229 Cal.App.3d 1011, 1027 (1991); *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 726-29 (1990). There is no such evidence in the record for this Project.

The IS/EA sets forth cursory and non-enforceable mitigation measures to purportedly reduce impacts to sensitive fish resources from pile driving. The measures call for pile driving activities located within Corte Madera Creek to be conducted June 15 through October 15 and only occur during daylight hours since salmon migrate and feed during dawn and dusk. *Id.* at 2.4-26. The IS/EA also calls for piles to be installed using a "vibratory" rather than an "impact" hammer *to the extent possible* and that if pile driving is required, sound attenuation devices *may* be used to reduce impacts. *Id.* at 2.4-27. There are several flaws with these measures and they therefore do not come close to providing the substantial evidence that the measures would effectively reduce impacts.

First, use of the language "to the extent feasible" and "may" provides no assurance that the measures will actually be implemented. Second, the IS/EA's technical appendix clearly asserts that the piles will be installed with an impact hammer, rather than a vibratory hammer. NES Bioacoustic Report at 11, 12. Third, restricting pile driving activities to June 15 through October 15 does nothing to protect the green sturgeon, since they occur in the Project area year round. *Id.* Fourth, even with attenuation, injury could occur to all fish species larger than 2 grams. *Id.* Finally, the Caltrans' Guidance confirms the potential ineffectiveness of the IS/EA's proposed mitigation measures, explaining that "studies on blast pressured attenuation by the USACE have indicated some, but not complete, success in reducing fish mortality using a bubble system." Caltrans' Guidance at 2-18.

The Caltrans' Guidance clearly documents the precise nature of mitigation that should have been – but was certainly not -- included in the IS/EA:

- Identify the type of attenuation anticipated to be used (e.g., bubble curtain, isolation casing, cushion block, or dewatered cofferdam). Indicate which piles these would be used for (if any). *See* Caltrans Guidance, Table 4-2: Information Needed for Evaluation of In-Water Pile Driving Effects on Listed and Other Fish Species.

- Estimate the decrease in transmitted sound pressure level from the sound attenuation device. Estimate the attenuation of sound through water to the ambient sound pressure level and to the injury threshold. *Id.*

- Identify potential mitigation for take of state-listed species. Under the California Endangered Species Act, the State requires mitigation for take of listed species. The amount of mitigation required must offset the loss of individuals due to the project, including any fish taken from fatal exposure to noise from pile driving. *Id.*

In sum, the IS/EA fails to identify the specific type of attenuation that would be used for each pile. Indeed, Caltrans fails to commit to the use of attenuation at all. The IS/EA never attempts to identify the anticipated decrease in transmitted sound pressure from the sound attenuation device. Nor does the document estimate the attenuation of sound through water to the ambient sound pressure level and to the injury threshold. Finally, the IS/EA does not identify the number of individual fish expected to be taken from fatal exposure. Consequently, the IS/EA lacks the evidentiary basis to conclude that fishery impacts would be mitigated to a less than significant level. Given the threatened and endangered species to be impacted by the proposed Project, Caltrans must impose all feasible mitigation measures. We again, direct Caltrans to its own Guidance document.

5. Significant, Adverse Impacts to Salt Marsh Harvest Mouse.

The IS/EA acknowledges that the Salt marsh harvest mouse, a federally listed endangered species, has the potential to occur within the BSA. *See* IS/EA at 2.4-22 and NES at i, v, vii. Yet, as with other threatened and endangered species, Caltrans fails to conduct any surveys for the mouse. *See* NES at 88. Instead, the IS/EA simply calls for pre-construction surveys. *Id.* As the Liu Report explains, the salt marsh on the north shore of Corte Madera Creek within and adjacent to the defined BSA, is of sufficient size to support this species. Consequently, because the IS/EA concludes the species is not likely to occur in the area, it fails to conduct any analysis of the Project's potential impacts on the mouse. *Id.* Such an approach is unlawful.

6. Significant, Adverse Impacts to Other Special Status Wildlife.

Although the IS/EA identifies two additional wildlife species that have the potential to be present in the BSA, it provides no analysis of the Project's potential impacts on these species. The first species, Trachusa gummifera, is a leaf-cutter bee. The second species, Tryonia imitator, is a California brackishwater snail. NES at 26. Both species are considered "special animals" by CDFW. *Id.* We can find no logical explanation as to why the IS/EA does not survey for, or analyze impacts to, these sensitive species.

In addition, as the Liu Report explains, the BSA and its vicinity likely provide breeding habitat for the San Pablo song sparrow, a California species of special concern. Here too, Caltrans fails to undertake any presence/absence surveys or even disclose the potential for the Project to impact the sparrow.

7. A Fair Argument Exists That The Project's Contribution to Significant Cumulative Impacts Is Considerable.

CEQA unequivocally requires lead agencies to disclose and analyze a project's "cumulative impacts," defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Guidelines § 15355. These impacts may result from a number of separate projects, and occur when "results from the incremental impact of the project [are] added to other closely related past, present, and reasonably foreseeable probable future projects," even if each project contributes only "individually minor" environmental effects. Guidelines §§ 15355(a)-(b). A lead agency must prepare an EIR if a project's possible impacts, though "individually limited," prove "cumulatively considerable." CEQA § 21083(b); Guidelines § 15064(h)(1).

Extensive case authority highlights the importance of a thorough cumulative impacts analysis. In *San Bernadino Valley Audubon Society v. Metropolitan Water District of Southern California*, 71 Cal.App.4th 382, 386, 399 (1999), for example, the court invalidated a negative declaration and required an EIR be prepared for the adoption of a habitat conservation plan and natural community conservation plan. The court specifically held that the negative declaration's "summary discussion of cumulative impacts is inadequate," and that "it is at least potentially possible that there will be incremental impacts. . . that will have a cumulative effect."

In contravention of the above authorities, the IS/EA provides only a cursory discussion of the Project's cumulative impacts. This anemic discussion is inadequate under CEQA for a number of reasons. First, although the IS/EA identifies about 20 land development and transportation projects as having potential cumulative impacts, the actual cumulative impact analysis for threatened and endangered species only analyzes the effects of two of these projects: the Central Marin Ferry Connection Multi-use Pathway Phase I Project and the Bon Air Bridge Replacement Project. *Id.* at 2.5-4. At a minimum, Caltrans must demonstrate that the incremental effects on biological resources from each of these other projects would not be cumulatively considerable. Since the document does not disclose this information, it is legally inadequate.

Second, the cumulative impact analysis focuses exclusively on threatened and endangered species, and fails to provide *any* analysis of impacts to other special-status plant and animal species. As discussed above, 9 special-status plant species and 27 special-status wildlife species have the potential to occur in the BSA. *Id.* at 2.4-7, 13, 14. Nor does the IS/EA address the cumulative loss of wetlands. The IS/EA's failure to evaluate the cumulative effects of the proposed Project and the other identified projects on all special-status species and wetlands is a fatal flaw.

Third, even the IS/EA's analysis of cumulative impacts for the threatened and endangered species is deficient because the document does not adequately evaluate whether the proposed Project's contribution is "cumulatively considerable" when viewed together with environmental changes anticipated from past, present, and probable future projects (CEQA Guidelines §§ 15064(h)(1), 15355(b).) In determining the significance of the Project's incremental contribution, the question is *not* the relative amount of the Project's contribution to the existing cumulative problem (i.e. does this Project contribute the same, less, or more than other projects), *but rather* whether the addition of the Project's impact is significant in light of the serious existing problem (i.e., is the Project's contribution to the existing environmental problem cumulatively considerable). Thus, the greater the existing environmental problem is, the lower the threshold of significance should be for considering a project's contribution to the cumulative impact. (*Communities for a Better Environment*, 103 Cal.App.4th at 120.). Caltrans can not conclude that the Project's contribution to a cumulative impact is not cumulatively considerable simply because the Project's impact would be reduced to a less than significant level. As discussed above, the IS/EA lacks the evidentiary support that the mitigation measures for the Project's impacts on the threatened and endangered species would effectively reduce Project impacts. Even if such measures were sufficient, the IS/EA must evaluate the remaining contribution after mitigation in light of other past,

present and future projects to confirm that any remaining effect is not a considerable contribution to the cumulative impact.

Because the IS/EA fails to adequately evaluate the Project's cumulative impacts and because the Project itself would significantly impact the region's rich biological resources, it is at least potentially possible that there will be incremental impacts to the many sensitive-status species in and adjacent to the BSA. In addition, the potential exists for cumulatively significant loss of wetlands. Consequently, Caltrans must prepare an EIR to examine these cumulative impacts.

IV. Conclusion

For the reasons set forth above, the Marin Audubon Society requests that Caltrans defer action on the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project until an EIR is prepared that fully complies with CEQA.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Laurel L. Impett

Laurel L. Impett, AICP, Urban Planner

Ellison Folk

Exhibit A: Interstate 5 North Coast Corridor Project, Supplemental Draft EIR/EIS, U.S. Department of Transportation and Federal Highway Administration and Caltrans, August 2012.

Exhibit B: Leonard Liu Report.

Exhibit C: Mike Podlech Report.

Exhibit D: Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities, California Natural Resources Agency, November 24, 2009.

Exhibit E: Technical Guidance for Assessment and Mitigation of the Hydroacoustic Effects of Pile Driving on Fish, February 2009.

cc: Barbara Salzman, Marin Audubon Society

452979.3

TAM
Transportation Authority of Marin

Caltrans

COMMENT CARD

Please submit comments today or mail by February 14, 2013 to:

Caltrans District 4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

Email: valerie_shearer@dot.ca.gov

To learn more about the project and to view the Environmental Document, visit www.tam.ca.gov or http://www.dot.ca.gov/dist4/envdocs.htm

Name: RON ROSANO

Phone: 415.601.0888

Address: 30 ELISEO DR. GREENBRAE CA

E-mail: RON@ROSANO.COM

Comments:

SEE ATTACHED.

Please use the reverse side or attach any additional pages

Ron Rosano
30 Eliseo Dr.
Greenbrae CA 94904

RE: Greenbrae/Twin Cities Corridor Improvement Project

Dear CalTrans:

The Greenbrae/Twin Corridor Improvement Project is HORRIBLE and would be diasastrous for the community.

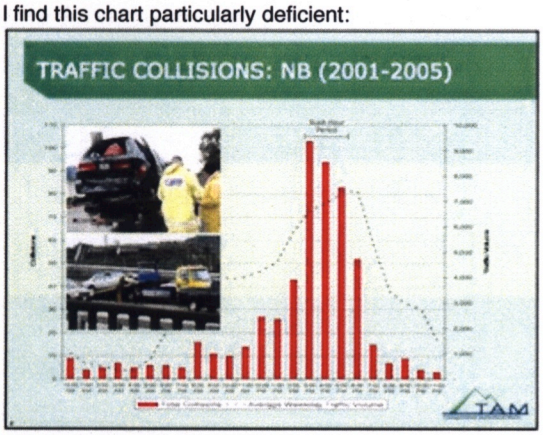
The scale far exceeds what is welcome or necessary, and goes against strongly-held beliefs of the majority of Marin citizens that embrace low growth and open space.

Like pretty much every person I spoke with about the proposal,
- I oppose eliminating the overhead pedestrian bridge
- I think having bikers and pedestrian cross additional lanes of traffic at freeway exits is dangerous
- I suspect that widening 101and adding and adjusting feeder roads will encourage more Highway 80 users to drive through Marin, leaving us with the same congestion or worse
- I'm strongly against how the project divides our community
- The proposal used flawed data to draw wrong conclusions
- A full EIR should be done.

Concrete murals don't replace views of hills or marshes. San Francisco tore down freeways and rejuvenated somewhat undesirable locations into vibrant neighborhoods. Highway 101 in San Rafael has recently been widened; if you widen 101 at Sir Francis Drake Blvd., then would the choke point just move farther south to Tamalpais Drive? And if you widened that, would it then be at East Blithedale?

Additionally, in the area between Via La Cumbre in Greenbrae and Sir Francis Drake Boulevard, the flyover depicts a beautiful tree-filled slope, where a sound barrier wall could be installed! If there are seven sound barriers that could possibly be included, they should be in the documents showing what the final result will look like. It's highly deceptive to leave those walls out.

I find this chart particularly deficient:



- Recent data should not be left out - why would you depend on data from over seven years ago?
- No author or data source is mentioned.
- Eastbound data is left out.
- Apparently, collision data for weekends is included, but weekend traffic volume is excluded - it's not a fully accurate representation of the conditions.
- Low resolution images block part of the data, look unprofessional, and are used to influence conclusions.
- The chart would only really be meaningful if data from similar locations was compared - is this a typical result, or is this better or worse than other places?
- The traffic volume data should be plotted on an axis that it peaks at 8,000, not 10,000 - it's misleading to have the axis for one data set be very close to the maximum data value, and the other axis to be around 25% more that the maximum data value.

Please eliminate the flyover, reduce the scale, and redesign the project!

I do appreciate improved bikeways and pedestrian paths; thank you for those.

Furthermore, please consider my Ideas about congestion management:

I'm not a traffic engineer, but I notice that when 101 northbound traffic slows to 0-15 MPH around Corte Madera at evening commute times, there is a noticable bunching up and speeding up that makes congestion worse. If drivers could travel at a constant speed, no matter how slow, the stop-and-go could be lessened, and help greatly with traffic flow.

An internet search for "how bunching up causes traffic congestion", shows much information on the idea. Perhaps we could use technology related to the CalTrans billboard system that gives up-to-the-minute travel times for destinations.

If Google can put a self-driving car on the roads, we should be able to get even a test system in place that gives drivers optimal MPH guidance. I think drivers would embrace a technology that included something like highway-side indicators that say "congestion level 4, 20 MPH suggested for optimal flow". Along with publication and driver education, much of the stopped traffic could be eliminated.

I urge you to come up with a new-technology solution that helps eliminate "shockwave" traffic jams like you see here:
http://www.geeknewscentral.com/2012/04/27/a-system-to-prevent-traffic-jams/

In the interests of lowering our carbon footprint and embracing a walkable, bikeable community, and in the spirit of Dr. Martin Griffin, the conservation movement and all of the Marin residents that support low growth and open space, there is no question that this project should be re-designed.

Lastly, I hope CalTrans and TAM will accept conditions that are somewhat less than typical CalTrans standards, and realize that if designs are required to be at 100% of standards, then those results could be far from what the public wants to see.

Sincerely,

Ron Rosano

Ron Rosano

Ms. Valerie Shearer
Senior Environmental Planner
Caltrans District 4
Office of Environmental Analysis, MS-8
P.O. Box 23660
Oakland, CA 94623-0660

MARIN CONSERVATION LEAGUE
Protecting Marin Since 1934

February 13, 2013

Via US Mail and E-mail

Re: "Highway 101 Greenbrae/Twin Cities Corridor Improvement Project"
District 4 – MRN – 101 – PM 7.2/8.9
EA 1A6600

Dear Ms. Shearer:

From its inception almost 80 years ago the Marin Conservation League has been actively involved in land use and transportation issues affecting the County. We believe that MCL's efforts have had an important role in creating and maintaining Marin's special character as a place to live and visit. For the past several years MCL has been following and participating in the proposals developed by the Transportation Authority of Marin for addressing traffic issues along highway 101 in the corridor between Sir Francis Drake Blvd. in Greenbrae and Tamalpais Drive in Corte Madera. Many of our members live in this area and are personally familiar with the problems and issues with this stretch of highway 101.

We oppose the proposed "Highway 101 Greenbrae/Twin Cities Corridor Improvement Project," for the reasons stated in the attached letter to TAM, and ask Caltrans to abandon it. In addition, we believe that it is disingenuous and illegal for Caltrans to pretend the project will not have *any* substantial environmental impact and bypass the preparation of an Environmental Impact Report under CEQA, and an Environmental Impact Statement under NEPA. If Caltrans does not abandon the project, then it should comply with CEQA and NEPA and prepare an EIR/EIS. Finally, we have reviewed the "Environmental Document" that was released by Caltrans in December 2012 and believe it is seriously flawed because it fails to consider or analyze significant environmental impacts of the proposed project. A complete environmental assessment of the project should be done before it is approved.

CEQA and NEPA Require the preparation of an EIR/EIS for this massive project

CEQA and NEPA require preparation of an EIR/EIS for any project that will have any substantial impact on the environment. We believe that it is unlawful for Caltrans to pretend that this massive project will not have any significant impact and issue a "negative declaration." If Caltrans does not abandon the project, then we demand that it end its charade and comply with the law. Some of the substantial, unmitigated environmental impacts of the project that

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require preparation of an EIR/EIS include:

The construction impacts of the project will be substantial: This project will entail multiple substantial environmental impacts during the lengthy construction phase, including traffic impacts, noise impacts and air and water quality impacts, including greenhouse gas emissions. The "Environmental Document" contains almost no discussion or analysis of these construction impacts.

Construction Related Traffic Impacts – Sir Francis Drake Blvd. ("SFD") operates at capacity during much of the day, and is highly susceptible to unacceptable traffic congestion. The recent temporary closure of Doherty Drive in Larkspur, although it lies across the creek from SFD, caused a substantial increase in SFD congestion, as well as increased congestion on Bon Air Road, and Magnolia Avenue in Larkspur. Although Caltrans has not disclosed its construction plans, it appears certain that the complicated rerouting of traffic will entail road/lane closures and detours that will create a huge traffic mess in the area. The "Environmental Document" acknowledges that there will be "traffic delays due to construction" (page 2.6-11), but does not describe or analyze the nature, timing or severity of the delays. Moreover, road closures, detours and the like will cause driver confusion and result in accidents. Traffic delays will also result in increased release of air pollutants by vehicles stuck in the snarl of traffic. These impacts will be substantial and cannot be mitigated.

Construction Related Noise Impacts – The "Environmental Document" admits the obvious fact that there will be construction-related noise impacts from the project, but makes no effort to describe or analyze them. It is evident that the noise impacts from a project of this magnitude will be substantial no matter what mitigation measures are taken. The project contemplates significant pile driving activity and use of heavy construction equipment and related activities. The document further makes the apparently inconsistent statements: (1) "It is anticipated that construction activities may intermittently dominate the noise environment in the immediate area of construction," (page 2.3-55), and (2) "Construction noise will be short-term, intermittent, and overshadowed by local traffic noise" (page 2.3-56). While neither of these statements is particularly informative, one seems to suggest that construction noise will "dominate" while the other suggests it will be "overshadowed" by traffic noise. Which statement is correct?

In any case, the extensive pile driving activity is certain to be extremely noisy, disruptive and unpleasant.[1] Construction noise also has the potential for disrupting wildlife in Corte Madera Creek and in Corte Madera marsh.

From the little information provided in the "Environmental Document," it appears that construction noise impacts will exceed those described in the Caltrans "Traffic Noise

1 Table 2.3-13 lists noise levels from a variety of "construction equipment that are commonly used on roadway construction projects," without identifying any specific equipment that will be used during the construction phase. "Vibratory" and "Impact" pile drivers are the noisiest items on the list, producing more noise than "blasting."

Analysis Protocol" issued in May 2011. Specifically, that document prescribes maximum noise levels for projects around Activity Category B Land Uses (*i.e.*, residential areas such as those surrounding the project).

While Caltrans' construction plans are not described, it is anticipated that it will attempt to mitigate the traffic impacts of project construction by doing as much work as possible at night. But such an approach would only increase noise disturbances in the surrounding residential neighborhoods.

Construction Related Air Quality Impacts – Virtually all of the heavy construction equipment used to build a project of this nature runs on diesel fuel. It is evident that a project of this magnitude will consume a very substantial amount of fuel and release a large volume of air pollutants into the atmosphere. These pollutants will include diesel fume particulates associated with respiratory diseases and other adverse health effects, and greenhouse gases. There is no way to mitigate the substantial air quality impacts of project construction, and the "Environmental Document," while acknowledging that there will be "short term degradation of air quality" due to construction, makes no effort to quantify the amount of substantial air pollution that will be generated during the construction phase.

<u>The visual impacts of the project will be substantial</u>: This massive project, with its "flyover" structure that will be visible for miles around, will be an eyesore. The surrounding area is dominated by residential neighborhoods, office complexes, marshes and parklands. For example, the view from the heavily-used pathway on the north side of Corte Madera Creek will be substantially impacted by the project, as will the views from the offices and residences along the creek. Likewise, sitting directly below Mt. Tamalpais, this massive freeway project will become a dominant landscape feature from the top of East Peak, one of Marin's most important scenic vistas, as well as many other popular trails and vista points, including, for example, Ring Mountain, many trails on the North and East flanks of Mt. Tamalpais, and as far away as Pine Mountain. These visual impacts are substantial and cannot be mitigated. The project is simply out of character with Marin.

<u>The pedestrian/bicycle routing impacts of the project will be substantial</u>: The project contemplates the elimination of the existing, heavily-used pedestrian/bicycle overpass just south of Corte Madera Creek. This important overpass is presently the primary route for many people crossing the freeway. Elimination of this structure will require pedestrians and bicyclists, many of whom are children travelling to and from school, to go out of their way and cross the freeway at Wornum Drive. However, the plan to make Wornum a major freeway interchange/access route will make this area extremely busy handling traffic entering and exiting 101. Routing all pedestrians/bicycles crossing the freeway into this busy traffic area presents a clear safety hazard. Instead of crossing over the freeway using a safe overpass at a convenient location, many people, including school children, will have to go out of their way to cross multiple lanes of heavy traffic. It can be anticipated that pedestrian/bicycle accidents will occur, and that some parents will opt to drive their children to school instead of putting them at risk. These impacts are substantial and cannot be mitigated.

CEQA and NEPA require Caltrans to consider alternatives in an EIR/EIS

A fundamental requirement of CEQA and NEPA is that environmental impacts of alternatives to a project must be considered *together with* the preferred alternative. The "Environmental Document" prepared by Caltrans does not do this. Instead, we have been told, that a number of alternatives were considered in the past and were eliminated from consideration. We believe that this approach is illegal under CEQA and NEPA, which require decision makers to have a complete environmental review of all alternatives presented in a single document so that their relative environmental impacts can be compared side-by-side. The goals, constraints and baseline data used at different stages of this lengthy project have changed, such that analysis of an alternative presented years ago appears to be outdated.

MCL believes that less intrusive alternatives should be considered side-by-side with the Caltrans proposal in a single EIR/EIS. While MCL cannot endorse any alternative until its environmental impacts have been studied, it appears that alternatives that simply add auxiliary lanes between Sir Francis Drake Blvd. and Tamalpais Dr. on one or both sides of the freeway could ease congestion and would improve safety by providing longer paths for merging onto and off the freeway. Likewise, preventing traffic from exiting southbound 101 at Lucky Drive (Fifer) could improve safety. We believe that any alternatives considered should provide for improvements to bicycle and pedestrian routes in the area, and specifically should retain or replace the existing highway overcrossing.

Specific comments on the "Environmental Document"

Caltrans and TAM contend that the "Environmental Document" that they rely on to issue a "negative declaration" is equivalent to an EIR/EIS. As noted above MCL believes that a complete EIR/EIS, including an environmental analysis of alternatives, is required. Nonetheless, MCL offers the following comments on the "Environmental Document," which we believe is seriously flawed. MCL observes that much of the discussion in the document is generic in nature and not directed to the specifics of the project. Likewise, the document refers to future studies, mitigations, etc. that will be implemented. We believe that CEQA requires a single document present the foreseeable impacts of the project without deferring studies to the future.

<u>The Environmental Document uses out of date and erroneous growth projections</u>

Much of the baseline data on growth used in the "Environmental Document" is out of date. For example, the population growth assumptions do not account for the latest "Plan Bay Area" projections for Marin County. Likewise, the document does not take into account the Larkspur SMART Station Area planning effort that is underway, nor the major expansion of Marin General Hospital. All of these important developments were known prior to the release of the document and should be considered.

The traffic data used in the environmental document shows that there is not a safety problem sufficient to justify the enormous expense of the project

The principal justification for this enormously expensive project is to improve safety. Yet the accident data presented in the Environmental Document suggests that accident rates in the project area are at or below statewide averages. Specifically, Table 1-1 describes the accident rates at the key highway 101 on and off ramps that will be affected by the proposed project. This table is the *only* traffic data that is used in Chapter 1 of the Environmental Document used to justify the need for the project. Yet Table 1-1 shows that accident rates at three of the four locations presented on the table are *below* state averages. The fourth location is shown to be somewhat higher than statewide averages, but the data ignores the recent addition of traffic pylons at this location, which will reduce the accident rate there.

Although not used to justify the need for the project, additional traffic safety data is presented in Table 2.2-15. This table presents accident data at 24 locations in the project area. Only one of the 24 locations has a total collision rate above statewide average. (This is the same location identified in Table 1-1 and, as described above, the configuration of this location has been changed to improve safety conditions there.) Although there were no traffic fatalities recorded anywhere in the project area, three additional locations (out of 24) show "Fatality + Injury" collision rates that are very slightly above state averages.

Table 2.2-15 notes that 226 accidents occurred in the project area on the freeway itself. In comparison, 127 are associated with the remaining 22 locations, the largest number of these occurring at the Tamalpais off-ramps, which would not be changed if the project were to be built. The data simply does not show the existence of a safety problem. [2]

Because the collision data in the Environmental Document does not show a safety problem, TAM has recently been relying on different accident data at public hearings on the project. However, TAM has conceded in a recent newspaper article that its "new" data contains inaccuracies and uses a different project area than the Environmental Document. As far as MCL is aware, TAM has not released it new collision data in a form similar to what is presented in Tables 1-1 and 2.2-15, and so it is difficult to assess, from the new data, whether the project will address a safety problem.[2]

The Environmental Document fails to adequately address traffic impacts on local streets

The proposed project entails substantial rerouting of local traffic and will have substantial impacts on local streets, including, Sir Francis Drake Blvd., Wornum Drive, Tamal

2 An MCL Board Member involved with the preparation of these comments recently contacted you for guidance as to which collision data would be the basis for Caltrans' decision on the project, and whether to comment on the old or the new data. You responded: "You should review the document that was officially circulated." A copy of this e-mail exchange is attached. The clear implication of your reply is that Caltrans will limit its review to the document that "was officially circulated." We certainly hope that you did not intentionally suggest that we limit our comments to information that Caltrans knows to be inaccurate or that it does not intend to rely on.

Vista Blvd., and Fifer Ave. The traffic impacts on local streets are only superficially discussed,

and it appears that the impacts will be negative. These impacts need to be fully analyzed and described in greater detail. For example, Table 2.2-23 shows that the project will have a substantial negative impact on the Sir Francis Drake – Eliseo Drive intersection, exacerbating the existing heavily congested conditions along this stretch of Sir Francis Drake. Likewise, the table shows that the project will negatively impact traffic conditions at the Sir Francis Drake/ Ferry Terminal intersection, and at Wornum Drive. As noted below, the implementation of the metering lights that will be installed as part of the project will increase congestion on local streets. This has not been discussed or analyzed.

Other traffic impacts are also not adequately analyzed. For example, TAM has said that the closure of the southbound 101 Lucky Drive exit will result in travelers to the area now served by the exit to get off the freeway at Sir Francis Drake Blvd., and then back onto to access road from Sir Francis Drake to the southbound freeway (which will provide access to Lucky/ Fifer). However, the Sir Francis Drake – Highway 101 interchanges are currently overloaded with traffic during peak periods, and directing more traffic into this area could result in added congestion, delays and back-ups. Minor changes to the timing of the traffic signals along this stretch of Sir Francis Drake could have major impacts on the flow of traffic in the area. This should be analyzed and discussed.

At public meetings TAM representatives have stated that they have fully modeled local traffic impacts and have tried to assure the public that the project will improve local traffic flow. Given TAM's relentless advocacy for this project, we must take these assurances with a grain of salt. Where is the data to support the conclusions? We question the value of a project which worsens local street traffic in favor of minor improvements to freeway traffic flow. MCL believes that the discussion of local traffic effects in the Environmental Document is flawed.

<u>The Environmental Document fails to address the implementation of metering lights</u>

The Environmental Document states that the new on ramp from Sir Francis Drake Blvd. onto southbound 101 will have new "ramp metering equipment installed." We must assume the only reason for incurring the expense of installing new ramp metering equipment is because it will be used at some point during the project life. Currently, as described in the Environmental Document, traffic entering southbound 101 from Sir Francis Drake backs up and causes significant congestion on both east and westbound SFD. It appears that metering this traffic will only exacerbate that congestion. We believe it is important that Caltrans analyze and describe the effects of metering light implementation on SFD and other local street traffic.

<u>The Environmental Document fails to address construction impacts</u>

As noted above, the "Environmental Document" fails to discuss any specific construction impacts of the project. It admits that there will be traffic, air pollution, and noise pollution impacts, but makes no effort to analyze or quantify them. How much noise? When? How much

traffic congestion will be associated with construction? What detour routes will be used? How much particulate matter will be emitted into the air during construction? How much green house gas emissions will be associated with construction, both from construction equipment and from cars stuck in construction-related congestion? None of these basic questions are answered. In addition, the Environmental Document states that the project "will require extensive excavation and earth moving construction activities, which could result in substantial erosion or the loss of top soil." No analysis of this environmental impact is provided. Finally, the discussion of biological impacts of the project ignores construction impacts or treats them generically and superficially.

<u>The Environmental Document's discussion of visual impacts is inadequate</u>

As noted above, the proposed project will have substantial visual impacts on a large region that cannot be mitigated. The analysis of the visual impacts of the project in the Environmental Document is superficial, starting with the erroneous contention that the "visual study area can be characterized as a highly urbanized environment." In normal usage, "highly urbanized" refers to the center of a major metropolitan area. The combined population of Larkspur and Corte Madera is less than 22,000 people, and much of the area adjacent to the project is low density residential (one or two story buildings), marsh lands and creekside lands. Characterizing this area as "highly urbanized" reflects either that the author is unfamiliar with the area, or that the author is deliberately mischaracterizing the situation.

The Environmental Document limits consideration of visual impacts to 7 viewpoints, all of which are immediately adjacent to the freeway. No mention is made of the fact that the massive project will be visible over a very large area that abounds with public trails and vista points. For example, the project will be highly visible from the top of Mt. Tamalpais (as well as many of the trails on the north and east flanks of the mountain), from the top of Ring Mountain (as well as the trails on the north side of the Ring Mtn.), from the Corte Madera Marsh, from Remillard Park, Niven Park, the pedestrian/bike pathway along the north side of Corte Madera Creek (bicycle route 20). The project will even be visible from the Pine Mountain Trail in Fairfax. There is no discussion of the visual impacts of the sound walls that will block views and serve to wall off one side of the freeway from the other.

<u>The Environmental Document fails to address the impacts of eliminating the pedestrian/bicycle freeway overcrossing</u>

As noted above, elimination of the existing highway 101 pedestrian/bicycle overcrossing will have a substantial, unmitigated impact for the reasons described. The Environmental Document fails to address or analyze this major change in pedestrian and bicycle routing. For example, rather than allowing their children to cross heavily used freeway access routes at Wornum Drive, many parents will, instead, drive their children to school. This is not discussed. Likewise, there is no discussion of expected accident rates at these crossing. Finally, there is no discussion of the traffic impacts of the lengthy light cycles required to provide adequate

pedestrian crossing time.

The Environmental Document relies on outdated and erroneous land use assumptions

Section 1.3.2 of the Environmental Document list the "Land Use Assumptions" employed in the document. This list, which is used to project traffic data, is incomplete and out of date. For example, it refers to the "Twin Cities Police Authority" building completed more than a year ago, as being a "future land development project." (This is reiterated in Table 2.2-1.) More importantly, the Environmental Document fails to consider the latest population and employment growth projections from Plan Bay Area, the Larkspur Station Area Plan, and the major expansion of Marin General Hospital.

Likewise, the discussion of "Cumulative Impacts" of the project is based on the same out-of-date land use assumptions and should be updated.

The Environmental Document fails to address "community character and cohesion"

In a brief two-paragraph discussion, the Environmental Document asserts that the project will have no negative effects on "community character and cohesion." MCL believes this discussion is superficial and wrong. Community access between the east and west sides of the freeway will be significantly impacted by the massive project, which will act as a wall between the two sides. Visual connection will be lost. Crossing at Wornum will become an ordeal.

Moreover, MCL believes that the overall massive scale of the project is simply out of character with values and aspirations of Marin residents. The attempt by the Environmental Document to gloss over these concerns demonstrates that the author is out of touch with the opinions of local residents and the policies of Larkspur and Corte Madera General Plans that make priorities of the quality of life and retaining a small town atmosphere.

The Environmental Document fails to adequately address the consistency of the project with the master plans of Corte Madera and Larkspur

Tables 2.2-3 and 2.2-4 purport to show that the project is fully compatible with the General Plans of Corte Madera and Larkspur, respectively. However, rather than presenting an unbiased analysis, it is evident that the author "cherry-picked" selected elements of those plans to advocate in favor of the project. For example, elsewhere the Environmental Document notes that Corte Madera's General Plan "includes a policy to recognize Redwood Highway and Tamalpais Drive as scenic corridors." In addition, the Environmental Document elsewhere notes that a policy of Corte Madera's General Plan is to: "Upgrade the scenic quality of Fifer Ave/Tamal Vista Blvd. area." Neither of these policies is addressed in Table 2.2-3, nor are they addressed in the discussion of visual impacts of the project.

The Environmental Document Fails to Adequately Address Noise Impacts

The analysis of noise impacts of the project is based on the assumption that multiple "sound walls" (noise barriers) will be used. Based on this assumption Caltrans concludes that noise impacts will be within acceptable limits. However, at recent public meetings TAM representative have announced that sound walls have been eliminated from the project. Thus, the discussion of noise impacts in the Environmental Document, and the conclusions are incorrect and should be redone based on the new design. Moreover, the discussion is limited to impacts in the area immediately adjacent to the freeway, and fails to assess the wider area that will be affected. Traffic noise from the new "flyover" will propagate unimpeded over a much further distance than ground level traffic noise. No mention is made of this impact.

The Environmental Document incorrectly characterizes Corte Madera Creek as "Highly Urbanized"

In discussing the biological impacts of the project, the Environmental Document states: "Corte Madera Creek is a highly urbanized and developed creek." Again, this characterization suggests either that the author is unfamiliar with the area, or that the author is biased. The area in question is a relatively natural suburban setting. Much of the creek east of the freeway is surrounded by marshlands. To the west, the north side of Corte Madera Creek is park land with a very popular pedestrian/bicycle trail. Numerous ducks and shorebirds populate the creek in the project vicinity. Dismissing this area as "highly urbanized" is incorrect and the discussion of biological impacts needs to be updated to accurately reflect the character of the area.

We appreciate the opportunity to comment on the Environmental Document, and thank you in advance for your anticipated careful consideration of our concerns.

Very truly yours,

Susan Stompe

Susan Stompe
President

Attachments (2):
- MCL Letter to TAM Commissioners
- E-mail exchange with Valerie Shearer

Attachment 1

Board of Commissioners
Transportation Authority of Marin
781 Lincoln Ave., Suite 160
San Rafael, CA 94901

MARIN CONSERVATION LEAGUE
Protecting Marin Since 1934

February 13, 2013

Via US Mail and E-mail

Re: "Highway 101 Greenbrae/Twin Cities Corridor Improvement Project"
District 4 – MRN – 101 – PM 7.2/8.9
EA 1A6600

Dear Commissioners:

From its inception almost 80 years ago the Marin Conservation League has been actively involved in land use and transportation issues affecting the County. We believe that MCL's efforts have had an important role in creating and maintaining Marin's special character as a place to live and visit. For the past several years MCL has been following and participating in the proposals developed by the Transportation Authority of Marin for addressing traffic issues along highway 101 in the corridor between Sir Francis Drake Blvd. in Greenbrae and Tamalpais Drive in Corte Madera. Many of our members live in this area and are personally familiar with the problems and issues with this stretch of highway 101. After reviewing the publicly available information, we oppose the proposed "Highway 101 Greenbrae/Twin Cities Corridor Improvement Project" as currently planned.

Global Warming

Marin will be significantly impacted by sea-level rise due to global warming over the next few decades. In addition, one well-documented effect of global warming has been to produce storms of greater intensity and severity. We believe that it is essential that all levels of government begin planning to deal with sea level rise and with more frequent and serious storm events. Any new long term investment in transportation infrastructure should proactively address these issues.

The Highway 101 corridor between Sir Francis Drake and Tamalpais is located in the Corte Madera Creek floodplain, and the project includes areas that are *currently* subject to periodic flooding due to tides and storms. Over time, the existing flooding issues will only get worse, and a project that does not address sea level rise and flooding is seriously flawed.

Moreover, this stretch of freeway is a critical link in Marin's transportation system, and closure of the road or its access points due to flooding could be devastating. Emergency vehicles rely on these routes. There is no realistic alternative route across Corte Madera Creek. MCL believes that the first priority of any new highway projects in the county should be to prepare for sea level rise.

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The Massive Scale of the Project Is Out of Character For Marin

The project appears to be one of the largest freeway projects undertaken in Marin in many decades. It would impose a huge mass of concrete as large as anything ever seen in Marin in order to create a complex web of new traffic routes. At Wornum Drive, for example, the project would almost triple the width of the existing freeway and its access points. An unsightly "flyover" structure would be visible for miles around. The project would act as a huge barrier between the east and west sides of 101.

This area of Marin is presently dominated by marsh lands and residential property. Despite the comment in the "Environmental Document" it is not anything close to be a "highly urbanized" area. Parks and other public spaces along the Bay and along Corte Madera Creek are found on both the east and west sides of the freeway, highlighted by views of Mt. Tamalpais. Since its inception, MCL has fought on behalf of maintaining the natural character of Marin. We believe that this project, with its enormous mass of new concrete roadways, is simply out of character with the values and aspirations of Marin's residents. It is inappropriate for Marin.

The High Cost of the Project Appears To Be Out of Proportion To The Benefits

Sir Francis Drake Blvd. ("SFD") is one of Marin's most important, heavily used and congested roads. A very large volume of SFD traffic from both east and west of highway 101 enters the freeway at this key intersection, and is one cause of SFD congestion. From careful review of the publicly available data, we believe that the project is likely to do little if anything to improve traffic congestion on SFD. Likewise, we believe that the available statistics for accident rates and travel times in the relevant portion of highway 101 show that these problems are not sufficiently serious to justify the very high dollar and environmental costs of the project. It is using a sledge hammer to kill a flea.

There are other major projects planned for the immediate vicinity that have the potential for exacerbating the already serious congestion of SFD. The City of Larkspur is developing a SMART "Station Area Plan" that has the potential for dramatically increasing SFD traffic in areas immediately adjacent to 101. Likewise, the plan for a major expansion of the Marin General Hospital will appreciably add to congestion on SFD. Neither of these major projects is discussed in the Caltrans documentation and so it appears that their impacts have not been considered.

The Project Would Have Substantial Negative Impact on Pedestrian and Bicycle Routing

While MCL favors some of the pedestrian and bicycle route improvements incorporated into the project, we believe that the elimination of the existing highway 101 overcrossing and the routing of pedestrian and bicycle traffic to Wornum is troublesome. We note that these changes have generated substantial complaints from bicycle advocacy groups

and from residents in the area. This is not merely a matter of convenience; we believe that requiring bicyclists and pedestrians to cross multiple lanes of Wornum traffic getting onto and off the freeway presents a serious safety issue.

CEQA and NEPA Require the Preparation of An EIR/EIS

CEQA and NEPA require preparation of an EIR/EIS for any project that will have a substantial impact on the environment. We believe that it is disingenuous and illegal to pretend the project will have not have *any* substantial environmental impact and bypass the preparation of an Environmental Impact Report under CEQA, and an Environmental Impact Statement under NEPA. The construction, noise, and visual impacts alone are substantial and require an EIR/EIS. Accordingly, we oppose proceeding with this project without fully complying with CEQA and NEPA.

Accordingly, we urge TAM to reject the project as currently proposed. Thank you for your consideration.

Very truly yours,

Susan Stompe
President

cc: California Department of Transportation

Subject: Re: Ques" ons Regarding Administra" ve Record for Greenbrae Interchange Project
From: Valerie Shearer <valerie.shearer@dot.ca.gov>
Date: 2/13/2013 9:40 AM
To: <dschnapf@comcast.net>
CC: <BWhitney@tam.ca.gov>, <DSteinhauser@tam.ca.gov>

Dear Mr. Schnapf:

Thank you for your commitment to promo" ng the best possible decision-making for the proposed project. I don't know of any parts of the public review document that are inaccurate or out-of-date, but you are welcome to comment on anything you heard at the public mee" ng as well. In general, when the public comment period closes on public review environmental document, we at Caltrans look at the en" re body of comments and start planning how to incorporate new informa" on, new ideas, and new analysis in the ?nal environmental document.

Sincerely,
Valerie Shearer
Caltrans District 4 O? ce of Environmental Analysis

David Schnapf <dschnapf@comcast.net>

David Schnapf
<dschnapf@comcast.net>

02/08/2013 12:21 PM

Please respond to
<dschnapf@comcast.net>

To
Valerie Shearer <valerie.shearer@dot.ca.gov>

cc
<DSteinhauser@tam.ca.gov>, <BWhitney@tam.ca.gov>

Subject
Re: Ques" ons Regarding Administra" ve Record for Greenbrae Interchange Project

Dear Ms. Shearer -

Thank you for your response. I have every intention of reviewing and commenting on the "environmental document" that has been circulated, but I am just trying to ascertain what parts of that document are presently known to be inaccurate or otherwise have been superseded by additional new or different information.

Pardon me for my continued confusion, but will Caltrans base its decision on the accident statistics in the "environmental document" or will it be based on the much different statistics that TAM has been relying on in recent public meetings to urge approval of the project? This issue goes to the very heart of the project, and I need to know which statistics will be relied on by the Caltrans decision-makers so that I can provide meaningful input. I hope that Caltrans does not view its "environmental

review" as being something that is done separately from the decision-making process.

I ask that my e-mail to you and your response be made part of the of"icial administrative record.

Very truly yours,

David Schnapf
Attorney at law

On 2/8/2013 11:39 AM, Valerie Shearer wrote:

Dear Mr. Schnapf:

You should review the document that was officially circulated. Caltrans will consider all comments before finalizing the environmental process. Every time we circulate an environmental document for public comment, we are open to learning new information and using it in forming conclusions. We hope that you will choose to provide comments at this stage on the environmental review document.

Sincerely,
Valerie Shearer
Caltrans District 4 O? ce of Environmental Analysis

David Schnapf <dschnapf@comcast.net>

David Schnapf	To	<Valerie_Shearer@dot.ca.gov>
<dschnapf@comcast.net>	cc	<DSteinhauser@tam.ca.gov>, <BWhitney@tam.ca.gov>
02/07/2013 11:29 AM	Subject	Ques" ons Regarding Administra" ve Record for Greenbrae Interchange Project

Please respond to
<dschnapf@comcast.net>

Valerie Shearer, Senior Environmental Planner
Caltrans District 4
Oakland, CA

Re: Marin Highway 101 Project - MRN - 101 - PM 7.2/8.9, EA 1A6600

Dear Ms. Shearer:

I am in the process of preparing comments on the "Initial Study" for the proposed "Highway 101 Greenbrae/Twin Cities Corridor Improvement Project." At recent meetings the public has been informed by representatives of the Transportation Authority of Marin that Caltrans is no longer relying on the traffic collision data set forth in that document because that data supposedly does not accurately portray safety conditions. Instead, we have been told that Caltrans will base its decision on traffic collision data that is not contained in the document. In addition, we have been told that the discussion of "sound walls" in the document is not correct because Caltrans has decided that there will be any sound walls.

This leaves me in a quandary regarding as to how I should prepare my comments. Shall I base my comments on what is stated in the document that was circulated to the public, or are there any

officials corrections to the document that I should, instead, look to? As you know, judicial review of any Caltrans action on the project is limited to the administrative record, and so it is important for me to understand what the record contains and which parts of the record are considered accurate by Caltrans.

Apart from the discussion of traffic collisions and sound walls, are there any other aspects of the "Initial Study" that are outdated or
inaccurate. I do not want to waste time addressing comments to any portions of the document that Caltrans knows to be wrong or that it will
ignore. Will Caltrans rely on documents/materials that have not been available to the public at any time during the comment period? Again, I think the official administrative record needs to be very clear on this.

Finally, as to the new traffic collision data that supersedes what is stated in the Initial Study, has Caltrans prepared supplemental tables
to replace Tables 1-1 and 2.2-15 so that the public can assess the details of where collision problems may exist? If so when will the new
tables be circulated to the public and will the comment period be extended?

Very truly yours,

David Schnapf
Attorney at Law

No virus found in this message.
Checked by AVG - www.avg.com
Version: 2013.0.2897 / Virus Database: 2639/6074 - Release Date: 02/01/13

No virus found in this message.
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Version: 2013.0.2897 / Virus Database: 2639/6074 - Release Date: 02/01/13
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Version: 2013.0.2897 / Virus Database: 2639/6074 - Release Date: 02/01/13
Internal Virus Database is out of date.

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Version: 2013.0.2899 / Virus Database: 2639/6101 - Release Date: 02/13/13

Attachments:

pic23747.gif 17179869184 GB

Lucky Drive Homeowners Association

February 13, 2013

Valerie Shearer
Caltrans Senior Environmental Planner
Caltrans

Dear Ms. Shearer:

This opposition to the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement Project is filed on behalf of the homeowners of 54-78 Lucky Drive. We are strongly opposed to this proposed project for many reasons, including, most importantly, the following:

- Noise
- Environmental impact
- Aesthetics
- Expense
- Failure to remediate flooding
- Destruction of neighborhood

We will be working with other groups to oppose this project in every way necessary.

Sincerely,

Ben Thurmond
President, Lucky Drive HOA

February 14, 2013

THE TOWN OF
CORTE MADERA
MARIN COUNTY CALIFORNIA

300 TAMALPAIS DRIVE
CORTE MADERA, CA
94925-1418

www.ci.corte-madera.ca.us

TOWN MANAGER
TOWN COUNCIL
415-927-5050

TOWN CLERK
415-927-5086

FINANCE / BUS. LICENSE
415-927-5055

FIRE DEPARTMENT
415-927-5077

PLANNING / ZONING
415-927-5064

BUILDING INSPECTOR
415-927-5062

TOWN ENGINEER
PUBLIC WORKS
415-927-5057

RECREATION DEPARTMENT
415-927-5072

SANITARY DISTRICT NO. 2
415-927-5057

TWIN CITIES POLICE AUTHORITY
415-927-5150

Valerie Shearer, Senior Environmental Planner
Caltrans Office of Environmental Analysis
P.O. Box 23660
Oakland, CA. 94623-0660
Valerie_Shearer@dot.ca.gov

Subject: Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Initial Study (with Proposed Mitigated Negative Declaration) / Environmental Assessment

Dear Ms. Shearer:

The Corte Madera Town Council acknowledges that some modifications to US 101 may be desirable to reduce commute hour traffic congestion and weaving distances, particularly at the NB US 101/Sir Francis Drake off-ramp and the SB US 101/Sir Francis Drake on-ramp. However, Town Council strongly rejects the proposed, towering, out-of-scale, southbound, fly-over off-ramp to Wornum Drive that is proposed as an integral design feature of the project. The visual impact of this southbound fly-over off-ramp has only become readily apparent in the past few months after a computer simulation of the structure has been made widely available to the public. This exceedingly tall, fly-over off-ramp is in stark contrast to Corte Madera's low density, suburban, community character and conflicts with numerous General Plan Policies. The proposed fly-over off-ramp is a completely inappropriate transportation design solution for this location, which appears to result in, at best, marginal improvement to projected future traffic conditions through the study area in the year 2035. For these reasons and for the reasons set forth below, the Town of Corte Madera cannot support proceeding with the project as proposed and requests that further, discussion, design, review, consideration of alternatives and a full Environmental Impact Report thereon take place prior to any further action on this project.

The Town of Corte Madera has conducted a review of the Initial Study/Environmental Assessment (IS/EA) circulated for the proposed project and finds numerous deficiencies relating thereto as set forth herein.

The PUBLIC NOTICE (Notice) for the January 29, 2013 hearing at Redwood High School listed all the locations where the Initial Study/Environmental Assessment (IS/EA) is available for review. The Notice stated the document is also available for review online at the Transportation Authority of Marin (TAM) website: www.tam.ca.gov and at the Caltrans website: http://www.dot.ca.gov/dist4/envdocs.htm. Not all the sections of the IS/EA were available for review online. The TAM website and the Caltrans website did not include Appendices A through G of the IS/EA. In addition, the Caltrans website did not include any of the Technical Studies, including, but not limited to the Fehr & Peer Multi-modal Report dated March 2012 and the Local Streets and Roadways report. Further, some of the information available online, such as the video simulations, were not available at the other identified physical locations set forth in the Notice. Because of these omissions, the entire environmental document has not been circulated properly in accordance with California Public Resources Code (PRC) Sections 21091 - 21092.

In addition to the circulation issues identified above, significant additional documentation has been made available by TAM and/or Caltrans subsequent to the release of the IS/EA. This additional documentation, including, but not limited to, the Draft Environmental Document Summary Information prepared for a Joint Council meeting of the Town of Corte Madera & City of Larkspur dated February 5, 2012, should be included in the record of proceedings. In addition, it does not appear that this additional information was made universally available to the public, and in any event was only made available ten days before the close of the comment period of the IS/EA.

The Town Council is deeply concerned about Caltrans/TAM's intent to adopt a Negative Declaration for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project (Project). At the outset, we note that all previous discussion with the Town Council, Town staff and the community with regard to the environmental review for the Project, identified that Caltrans/TAM would be completing a full Environmental Impact Report/Environmental Impact Statement (collectively, EIR) for the proposed project. In fact, Caltrans/TAM previously released a Notice of Preparation advising the public of its intent to prepare an EIR for this Project. In addition to the specific issues relating to the legal adequacy of the proposed IS/EA and Negative Declaration/Finding of No Significant Impact (collectively, Neg. Dec.) set forth below, the shift in approach to the environmental disclosure document for this important regional project, at this late date, serves to woefully deprive the responsible agencies, surrounding jurisdictions, other public agencies and the public of a meaningful opportunity to understand and evaluate alternatives to the proposed project and to receive responses to their expressed concerns regarding its environmental impacts. As a responsible agency, the Town Council is deeply concerned about this shift and does not believe that it can rely on the proposed IS/EA/Neg.Dec. in taking the discretionary actions required of the Town Council in order for the Project to proceed.

At the outset, the Town recognizes that the IS/EA prepared for the Project is intended to be a joint National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) document as both statutes are applicable to this Project. It is significant therefore to note that the

IS/EA must comply with the requirements of both NEPA and CEQA in the present circumstances. See, *Nelson v. County of Kern* (2010) 190 CA 4th 252, 279-282. As CEQA rather than NEPA is the law applicable to the Town and other state agencies, the Town's specific comments below address the compliance of the IS/EA/Neg.Dec with the requirements of CEQA. As set forth in detail below, the Town believes that the IS/EA/Neg. Dec, substantively fails to meet the requirements of CEQA.

As you are aware, CEQA contains a strong presumption in favor of the preparation of an EIR. Pursuant to CEQA, if the project **may** cause a significant effect on the environment, the lead agency **must** prepare an EIR. PRC 21100, 21151. Based upon the requirements of California law, if substantial evidence in the record supports a fair argument that the project may have a significant effect on the environment the lead agency **must** prepare an EIR. See, *No Oil, Inc. v City of Los Angeles* (1974) 13 Cal.3d 68, 75. Based on the Town's review and analysis of the IS/EA, as set forth below, it is clear that the IS/EA incorrectly concludes that the Project would not have a significant effect on the environment. The Town Council therefore believes a full EIR is required for this Project.

General Comments

The IS is, in general, woefully lacking in evidentiary support for the conclusions reached in the document. The CEQA Initial Study Checklist (Checklist) is contained in Appendix A of the IS/EA. While the inclusion of the Checklist is in this instance necessary to a determination of significance under CEQA, the IS/EA fails to meaningfully utilize the checklist to address potential environmental impacts. Appendix A sets forth mere conclusions on many of the topic areas of the Checklist with no explanations or supporting evidence. The IS attempts to reference the EA as to many of the topic areas, however, the EA completely fails to analyze many of the checklist questions and contains inaccurate and missing information. This cursory attempt at compliance with CEQA is legally inadequate.

The Town's analysis of the specific inadequacies for which information is provided in the IS/EA are set forth below. However, the Town notes that in addition to the information set forth below, the failure of Appendix A to provide analysis supported by substantial evidence for each of the topic areas set forth therein renders the IS legally inadequate pursuant to CEQA.

Chapter 1

The purpose and need section of the IS/EA contains information and data which purport to inform the entirety of the document. The Town is dismayed that the information and data upon which the document relies is fatally flawed. The collision rates relied upon in the IS/EA as set forth in Chapter 1, appear to include data from outside the project area and fail to account for the cause/type of the collision. This inaccurate and incomplete data means that the document is inadequate in determining whether the Project as designed will address the identified purpose therefor. First, the rates appear to include collisions from outside Marin and the relevant improvement corridor. In addition, the rate,

even if made accurate, does not in and of itself provide sufficient information. The rate alone, does not tell us anything except that there were either more crashes than experienced on average throughout the state on similar facilities, or there were fewer than average. To understand whether or not a project will address a specific safety issue it is necessary to look at the types of crashes, with the most important piece of information being the primary collision factor. The primary collision factor is not shown in the data provided. Data on the number of crashes that occur within the segment and that are sideswipes due to changing lanes and other combinations that indicate the merge activity would be the only data relevant to the determination of a purported safety problem which the proposed Project is attempting to remedy.

The Project Description set forth in Chapter 1 is likewise inaccurate. The description fails to accurately describe several necessary components of the project, including the closure of Nellen Ave. and the related property acquisitions. Further, Chapter 1 fails to identify the Town of Corte Madera as a responsible agency and fails to identify Freeway Agreements with the Town as a component of the Project Description and as a necessary project approval. An accurate and complete project description is integral to an adequate CEQA document and necessary for an intelligent evaluation of the potential environmental effects of the proposed Project.

Set forth below in **bold**/*italics* are portions of the IS/EA which the Town finds inaccurate and/or unsupported followed by the Town's comments relating thereto.

Chapter 2

2.1 Issues with No Adverse Impacts

Community Impacts
Community Character and Cohesion ***(page 2.1-2)***
The proposed improvements will not negatively affect community cohesion, as the project will not displace any existing commercial, industrial or residential land uses. The proposed roadway improvements are on, and immediately adjacent to, existing highways and roads. Small amounts of private property will be required for the project, primarily affecting landscape areas and parking areas associated with commercial land uses. No new physical or perceptual barriers will be created. Community cohesion will be improved through the installation of bicycle and ADA-complaint pedestrian improvements, which will provide a net benefit by increasing connectivity to transit, recreation areas and regional trails.

Although no existing commercial, industrial or residential land uses will be directly displaced, the property acquisition of commercial parcels in the Fifer/Nellen area will result in a significant effect to these uses due to the loss of required on-site parking and existing on-street parking. Such loss of on-site parking will cause a non-conforming condition as defined in the Corte Madera Zoning Ordinance, which affect existing business viability and which will result in an inability of these businesses to expand in any way. In addition, direct street frontage and easy vehicle access to these commercial

properties as well as the 195-205 Tamal Vista residential properties will be lost. These access and parking changes clearly affect the community character and cohesiveness of the neighborhood in which these properties are located. These impacts will reduce the viability and long term success of these and/or future business ventures at these properties. The Town's sales tax revenue and business license revenue would also be negatively affected if business viability is affected.

In addition, while the Project includes certain new bicycle and pedestrian pathways along the Nellen Avenue right-of-way, Wornum Drive and Redwood Highway, an important and well-used pedestrian/bicycle bridge at the north end of Nellen Avenue will be removed. The bridge spans US 101 and is used by pedestrians and bicyclists traveling to and from the Larkspur Ferry Terminal and the new Cal Park Tunnel. Residents of two mobile home parks and the Greenbrae Boardwalk on Redwood Highway also use the bridge to access services and schools on the west side of the highway. The removal of the bridge will decrease connectivity in the community and serve to divide it irrevocably. The proposed alternative route identified in the Project crosses US 101 using the Wornum Drive underpass. Pedestrians and bicyclists using Wornum Drive underpass will have to cross multiple signaled intersections and multiple lanes of traffic, including highway off-ramps and highway on-ramps. Further, the alternative route will result in less separation between vehicles and bicycles/pedestrians than currently exists with the overcrossing, likely resulting in increased safety impacts associated with travel from one side of the freeway to the other for bicycles/pedestrians. This alternative route is contrary to the "safe and separate" design model that facilitates alternative pedestrian and bicycle usage. Pedestrian signal lights could also slow vehicle movements through these intersections, which would compound traffic congestion on local streets. In addition, this alternative route would represent a .6 mile detour for some users from the current route. These conditions clearly affect community character and cohesion as well as serve to physically divide an established community currently linked by Nellen Ave. and the existing pedestrian/bicycle overcrossing. These impacts are significant and are likely unavoidable absent changes in the proposed Project. Therefore, the impacts must be evaluated in an EIR.

In addition to the issues identified above relating to pedestrian safety, the Town has received a Memorandum from the Corte Madera Accessibility Advisory Committee expressing their concerns over the project and the analysis contained in the IS/EA. Attached hereto and incorporated herein by reference is the Memorandum.

2.2 Human Environment

2.2.1.2 Existing and Future Land Use
Environmental Consequences (page 2.2-3)
The project will improve local access for the existing community serving commercial and residential land uses. The new interchange at Wornum Drive will facilitate planned redevelopment of the Tamal Vista area, as well as the future Rose Garden residential development, further west. The project will not conflict with the existing or future development patterns along the Greenbrae/Twin Cities Corridor.

No actual factual information or analysis is provided in the IS/EA which supports the above identified conclusion. It is unclear how local access for the existing community serving commercial and residential land uses are claimed to be improved by the proposed Project. No new access or improved access to any properties within Corte Madera is proposed to be provided by the Project. In fact, as noted above, access to some commercial and residential land uses along Nellen Ave. will be negatively impacted by the proposed Project. Similarly, parking will be negatively impacted along this corridor resulting in access impacts for local businesses. The conclusion of the IS/EA in this regard is inaccurate and unsupported. This is a significant impact.

2.2.1.2 Consistency with State, Regional, and Local Plans and Programs
Environmental Consequences (page 2.2 3-5)
The Build Alternative is consistent with the Marin Countywide Plan, the Town of Corte Madera General Plan, and the City of Larkspur General Plan, as described in Tables 2.2-2 through 2.2-4.

Again, the consistency conclusions set forth in table 2.2-3 are mere conclusions without any factual support or analysis.

Corte Madera General Plan Policy LU-1.6: Identify opportunities to achieve desired land uses and physical improvement in the Fifer Avenue/Tamal Vista Boulevard area.

It is unclear how the IS/EA reaches the conclusion that the Build Alternative is consistent with this Land Use Policy. As previously noted, no new access to properties is proposed by the Project. In addition, the IS/EA states that the Project will not increase capacity on the freeway segment, thus it is difficult to understand how the project represents an opportunity to achieve desired land uses in the area.

Corte Madera General Plan Policy CIR 1.1: Provide safe and convenient linkages between all modes of travel within the planning area, and extending between the Town and adjacent jurisdictions in the region.
Corte Madera General Plan Policy CIR 3.1: Increase the Town's network of bicycle and pedestrian paths, especially Class 1 facilities, as viable alternatives to vehicular transportation, especially for access to neighborhoods, commercial centers, schools, parks and other key activity centers.
Corte Madera General Plan Policy CIR 3.3: Explore opportunities to install bicycle and pedestrian paths that provide connections to surrounding communities and regional open spaces.
Corte Madera General Plan Policy CIR 3.5: Emphasize use of pedestrian pathways and sidewalks as an integral part of the Town's circulation system.

Again, no analysis or discussion is provided to support the conclusion of consistency with these policies. It is difficult to see how re-routing traffic currently using Nellen Ave by requiring it to travel through the neighborhood, removing a direct pedestrian and bicycle linkage, replacing it with a re-routing which increases travel distances by more than one half of a mile, and removing a local street

providing neighborhood access could be consistent with policies calling for providing safe and convenient linkages or improvement of bike and pedestrian paths. Further, as noted above, the removal of the dedicated bicycle/pedestrian overcrossing in favor of pedestrians and bicyclists using Wornum Drive underpass will result in causing bicycles/pedestrians having to cross multiple signalized intersections, multiple lanes of traffic, highway off-ramps and highway on-ramps, and will increase vehicular and bicycle/pedestrian conflicts by removing the separation which currently exists. This condition would appear to be directly contrary to the General Plan Policies set forth above relating to bicycle/pedestrian access.

In addition to the missing and inaccurate information relating to the policies identified above, other relevant policies of the Corte Madera General Plan were completely omitted from discussion. The Corte Madera General Plan addresses transportation and other infrastructure projects impacting local businesses and design sensitivity as described in CIRCULATION Policy-1.4, COMMUNITY DESIGN Policy-6.1 and LAND USE Policy-2.10. The Town believes the proposed southbound, fly-over off-ramp is inconsistent with these General Plan policies as well.

POLICY CIR-1.4 Work cooperatively with surrounding jurisdictions to effectively address concerns of through-traffic on Town streets, seeking innovative traffic solutions to issues related to peak-hour commute patterns and practices.

The proposed project will require a re-routing of traffic which would otherwise have direct access to Nellen Ave. The IS/EA fails to analyze the impacts associated with this re-routing, including those relating to consistency with the above noted General Plan policy.

Implementation Program CIR-1.4.b: Highway 101 Changes
The Town's support for Highway 101 projects will depend on the extent to which there is community benefit. The Town will oppose any modifications to Highway 101 on- and off-ramps that would have an overall adverse impact to its businesses or movement of people through the community.

As set forth herein, the Town has determined that there are several potentially adverse impacts of the proposed project that have not been analyzed in the IS/EA, including circulation impacts to properties located along Nellen Avenue, re-routing traffic bound for Larkspur along Wornum Drive and Tamal Vista Boulevard and changes to bicycle and pedestrian facilities. Without addressing these impacts, the proposed Project may be inconsistent with the above identified implementation program. Analysis of this potential inconsistency must be included in the IS/EA.

The Technical Studies describing the implementation of Class II Bike Lanes on the north-bound and south-bound sides of Tamal Vista Boulevard between Fifer Avenue and Madera Boulevard are inadequate and incomplete. The existing curb to curb cross-section for Tamal Vista Boulevard (Fifer to Wornum) is 40 feet. The proposed curb to curb cross-section is shown as 42 feet with no discussion or analysis of costs or feasibility to relocate curbs, gutters, storm water grates and utilities. The existing curb to curb cross-section for Tamal Vista Boulevard (Wornum to Madera) is 42 feet. The proposed curb to curb cross-section is shown as 42 feet with no discussion or analysis on the proposed loss of on-street parking (Council Crest to Madera). Loss of on-street parking is a significant negative

impact to these home owners. The proposed cross-section (Council Crest to Madera) also proposes an unnecessary center turn lane which fronts single family homes on the westerly side of the street and an existing Red Zone on the easterly side of the street.

POLICY CD-6.1 Support infrastructure improvements that meet service objectives while considering sensitivity to natural systems.
Implementation Program CD-6.1.a: Criteria for Infrastructure

Include criteria for site improvements for installation of infrastructure in the Design Guidelines. This shall include provisions weighing the need for the infrastructure improvements with any particular site constraints pertaining to design and the natural environment. Where practical, designs should minimize visibility of infrastructure improvements from public rights-of-way and adjoining properties through site planning and use of landscaping and berms.

As set forth herein, the Town has determined that there are several potentially adverse impacts of the proposed project that have not been analyzed in the IS/EA, including visual and community compatibility, biological and noise impacts. Without addressing these impacts, the proposed Project may be inconsistent with the above identified implementation program.

As set forth herein, the Town has determined that there are several potentially adverse impacts of the proposed project that have not been analyzed in the IS/EA, including visual and community compatibility impacts. Without addressing these impacts, the proposed Project may be inconsistent with the above identified implementation program.

POLICY LU-2.10 The Town's predominate land use theme and character of low-density residential neighborhoods shall continue to be emphasized and supported through Town land use actions. Key characteristics of the Town's low-density residential development include quality design and construction, variety in architectural styles, and modest scale. Public and private development and remodeling proposals as well as infrastructure projects, shall
comply with the Town FAR Ordinance, and the Design Guidelines, once adopted.

As set forth herein, the Town has determined that there are several potentially adverse impacts of the proposed project that have not been analyzed in the IS/EA, including visual and community compatibility impacts. Without addressing these impacts, the proposed Project may be inconsistent with the above identified implementation program.

CIRCULATION Goal-2 GOAL-2 Prioritize options for improving bicycle and pedestrian access across Highway 101.

As set forth herein, the Town has determined that there are several potentially adverse impacts of the proposed project that have not been analyzed in the IS/EA, including circulation impacts to bicycle and pedestrian facilities. Without addressing these impacts, the proposed Project may be inconsistent with the above identified implementation program.

In sum, the failure of the IS/EA to adequately analyze the conflicts of the Project with the applicable land use plan renders the environmental document inadequate. Further, without substantial changes to the proposed project, it would appear that these inconsistencies cannot be mitigated. Thus, an EIR must be prepared.

2.2.1.3 Parks and Recreational Facilities
<u>Bikeways</u> (page 2.2-8)
As described in Chapter 1, Proposed Project, improved pedestrian and bicycle facilities (i.e., Class I bike paths and Class II bike lanes) will be provided along the NB US 101 off-ramp crossing of Corte Madera Creek, Redwood Highway, Wornum Drive, Tamal Vista Boulevard, Lucky Drive, and Fifer Avenue that will enhance the connectivity of the bicycle and pedestrian network in the area.

The above statement is a conclusion for which no factual or analytical support is contained in the IS/EA. As noted above, and as set forth in the technical memorandum from W-Trans, attached hereto and incorporated herein by reference, a re-routing of existing pedestrian and bicycle facilities which results in a more than one half mile detour and which cuts off direct access between neighborhoods, will adversely impact rather than enhance the connectivity and pedestrian network in the area. This is a significant environmental effect.

2.2.1.3 Parks and Recreational Facilities
<u>Section 4(f) Bay Trail</u> page 2.2-10
The bike paths and bike routes designated as part of the Bay Trail are considered recreational resources protected under Section 4(f), and the removal of the Nellen Avenue pedestrian overcrossing and severing of the Bay Trail, as proposed under the Build Alternative, constitutes a "use" of this Section 4(f) resource. The realignment of the Bay Trail is considered minimal or de minimis due to incorporation of a Transportation Management Plan (TMP) during project construction and provision of a new improved crossing of U.S. 101 at Wornum Drive, which will ensure continued availability of the trail during construction and beyond. A full analysis of the Section 4(f) resources, including de minimis findings, is located in Appendix C.

The Corte Madera Town Council does not support the removal of the Nellen Avenue pedestrian/bicycle overcrossing and its effect on the route of the Bay Trail. The proposed re-routing repositions the Bay Trail to the westerly side of Highway 101 between the current site of the overcrossing and Wornum Drive, which is further removed from any bayside connection. The impacts are not de-minimus and the findings contained in the IS/EA relating thereto are not supported by substantial evidence. If the overcrossing is eventually removed as a result of this project, the Bay Trail should be repositioned so it has a closer connection to the Bay. It should run parallel to Redwood Highway and the northbound Sir Francis Drake off-ramp in the segment between the intersection of Redwood Highway and Wornum Drive (south end) and Sir Francis Drake (north end).

Corte Madera acknowledges the optimal location of the Bay Trail north of the Redwood Highway and Wornum Drive intersection as advocated by the Association of Bay Area Governments (ABAG) would

align with the vacated North Western Pacific Railroad Right-of-Way over Corte Madera Creek. This alignment abuts sensitive wetlands habitat and would require careful design and mitigation to avoid any adverse impacts.

Further, the Avoidance, Minimization, and/or Mitigation Measures proposed in the IS/EA for the Nellen Avenue pedestrian/bicycle overcrossing and subsequent relocation of the Bay Trail are inadequate to mitigate the impacts. The document states that removal of the overcrossing will be the first phase of the project. The detour routes are not described and are left to the formulation of a future Transportation and Management Plan. It is clear however, that if the overcrossing is removed first, the detour routes will be critical in determining the impact. Mitigation measures which call for a mitigation plan to be devised based on future studies or plans including only a generalized mitigation goal rather than specific performance standards are a legally inadequate deferral of mitigation. See, *San Joaquin Raptor Rescue Ctr. v County of Merced* (2007) 149 Cal App 4th, 645, 669.

The environment effects of the Project are not de minimus, and remain significant after mitigation, therefore, and EIR must be prepared.

2.2.3 Community Impacts

2.2.3.1 Relocation and Real Property Acquisitions

<u>Commercial Property Acquisitions</u> (page 2.2-19)

The proposed Build Alternative improvements along Nellen Avenue and Fifer Avenue will eliminate driveway access to six parcels. Four of these parcels have alternative access points. The remaining two locations listed below do not have existing alternative access points, and will be provided new driveways as part of the Build Alternative.

Big 5 Sporting Goods: access at this location will be maintained by adding a new driveway from the reconfigured Nellen Avenue (see parcel 15 on Figure 2-5).

Healus Center: a new driveway will be added at the southwestern corner of the parcel, eliminating (and replacing) 2 to 3 existing parking spaces (see parcel 14 on Figure 2-5). The property will continue to have over 30 parking spaces that will provide adequate parking for the Healus Center's employees and patrons. Driveway access to these locations will be used on a temporary basis while construction occurs. Once construction is complete, driveway access will be restored to these locations. As a result, there will be no long-term effects to the use of the property.

As noted above, these commercial properties will be significantly affected by the loss of required on-site parking causing a non-conforming condition, which will affect tenant leasing and expansion opportunities. These impacts will reduce the viability and long term success of these and/or future business ventures at these properties. Direct street frontage and easy vehicle access to the properties will also be lost. Future vehicle access to commercial properties in the Lucky Drive/Fifer Avenue/Nellen Avenue triangle will require a circuitous route through the Lucky Drive/Fifer Avenue intersection. This intersection has an awkward T-intersection with two through-lanes and a yield-lane. No discussion or analysis was provided in the environmental document to address increased traffic at this intersection or the impacts relating to impairment of access to these properties.

Further, this section of the IS/EA fails to discuss or analyze the property acquisitions required from the Town of Corte Madera or the City of Larkspur.

Finally, the Avoidance, Minimization, and/or Mitigation Measures identified fail to mitigation the impacts. The IS/EA proposes that impacts to the visibility of businesses along the elevated section of the Project will be mitigated by working with local agencies and property owners to assist with the raising of heights of business signs. However, this mitigation is, at best speculative and likely infeasible. The Lead Agency cannot guarantee that such signs can be constructed or approved. Further, given the height of the proposed elevated highway structures, it is unlikely that a sign could be constructed of sufficient height to be clearly seen from the freeway without creating additional environmental impacts or construction and safety related concerns. Further, the Corte Madera Sign Ordinance prohibits sign placement atop the roof and above the building wall parapet. As the identified mitigation measure fails to mitigate the impacts to a level of insignificance, an EIR must be prepared.

2.2.3.2 Environmental Justice

<u>Environmental Consequences</u>

There will be no displacement of minority or low-income residents, businesses, or employees and therefore no direct effect on identified environmental justice communities in the study area. Disproportionate indirect effects to environmental justice communities related to noise levels and air quality degradation, as discussed in Section 2.3.6, Air Quality, and Section 2.3.7 Noise, will not occur under the Build Alternative.

The conclusion above and the analysis contained in the IS/EA, fail to disclose and analyze the fact that disproportionate environmental effects relating to air quality and noise do exist relating to the 195-205 Tamal Vista Project (the "195 Project"). (see discussion below regarding Air Quality and Noise) The 195 Project includes affordable housing units which will be impacted at a greater level that other residential properties within the study area. These disproportionate impacts must be evaluated.

2.2.4 Utilities

The IS/EA fails to analyze whether the Project will result in the construction of new water or wastewater treatment facilities. The IS/EA does not address or analyze the need to relocate the Fifer Sanitary Pump Station PVC Force Main as a result of the Project. This relocation could result in a significant impact to the environment depending on the location of the relocation and further could result in an impact relating to the future maintenance, repair, replacement and upgrade of the sanitary facilities in the Town. The IS/EA additionally does not address the impacts the project may have on Sanitary District No 2's 12" and 20" sanitary force mains running under the Redwood Highway and under Corte Madera Creek immediately adjacent to and parallel with Highway 101 Further, the IS/EA

fails to analyze and disclose the impacts associated with the PG&E gas transmission line in the area. These impacts must be analyzed.

2.2.5 Traffic and Transportation
2.2.5.2 Affected Environment
<u>Collision Rates</u> (page 2.2-40)
Collision records for US 101 within the traffic study area include accident data from January 2007 through December 2009. Table 2.2-15 summarizes the types of accidents recorded over a three year period (2007-2009) and compares collision rates with Caltrans' statewide average accident rates for similar highway segments . Based on the information from these three years, the collision rate for the highway within the traffic study area is below the statewide average. Several ramps within the traffic study area have higher accident rates than the statewide average ... Southbound US 101 ramps with higher accident rates than the statewide average include the Tamalpais Drive off-ramp and the Fifer Avenue off-ramp. Both of these locations have a higher fatalities plus injury rate, but a lower accident total. This reflects fewer but more severe accidents in this area.

One of the primary stated purposes of this project is to reduce traffic congestion and improve safety and operations of US 101. Construction of the proposed southbound fly-over off-ramp to Wornum Drive is intended to address these conditions. Recent Collision Rates are provided on Table 2.2-15 and are intended to provide traffic data justifying construction of the Wornum off-ramp. A closer look at the Southbound Ramps in Table 2.2-15 reveals no collision rate data justifying the construction. The Actual Collision Rates at the following locations are all <u>lower</u> than the comparative statewide collision rates: Fifer Ave off-ramp, Sir Francis Drake Blvd. on-ramp, Segment-SB 101 on from EB SFD, Segment-SB 101 on from WB SFD as is admitted in the IS/EA. The Fifer Avenue on-ramp location is marginally higher than the comparative statewide collision rate, but there was only <u>one</u> injury collision in the entire review period. Further, as noted above, the cause and type of the collisions are not disclosed or analyzed. This calls into question the issue of the purpose of the proposed project and whether an alternative thereto could equally serve the stated objectives.

Further, while not an environmental impact, the Town is concerned about the cost benefit analysis of the proposed Project. The design and construction cost of the Wornum Drive fly-over off-ramp is undoubtedly a significant portion of the $143,700,000 total estimated project cost. The Corte Madera Town Council does not believe such excessive cost is justified by the recorded collision data and believes a less costly and less visually obstructive alternative design should be analyzed for this southbound segment of US 101.

2.2.5 Traffic and Transportations
2.2.5.2 Affected Environment
<u>Transit Conditions</u> (page 2.2-42)

This section of the Initial Study/Proposed Negative Declaration simply describes in general terms the Golden Gate Transit and Marin Transit bus routes through the Corridor. There is no discussion or analysis that the proposed fly-over off-ramp to Wornum Drive will require south-bound buses accessing the new Fifer Avenue Bus Pad to exit the southbound US 101/Sir Francis Drake Boulevard off-ramp, travel through this intersection and merge with the southbound US 101/Sir Francis Drake Boulevard on-ramp to reach the Bus Pad. How will this affect bus schedules and transit performance? Further, it is unclear what the safety impact will be to pedestrians traversing the area to use the relocated bus stops. In addition, the Technical Studies describing Transit Services (Fehr & Peers Multi-modal Report March 2012) incorrectly depicts the commuter bus route to San Francisco from east-bound Sir Francis Drake.

Further, the CEQA Environmental Checklist for the Project shows "No Impact" under XVI. TRANSPORTATION/ TRAFFIC a) with regard to mass transit performance. "No Impact" cannot be concluded without accurately citing the bus routes affected by the project and the requisite discussion and analysis.

2.2.5 Traffic and Transportations
2.2.5.2 Affect Environment
<u>Parking</u> page 2.2-42
A survey of the existing on-street parking spaces adjacent to the Lucky Drive bus stops was conducted to determine how much on-street parking is currently available for commuters. As shown in Table 2.2-16, approximately 180 on-street parking spaces are currently provided within the traffic study area. Of these spaces 145 are considered to be in demand for park and ride and other uses. The existing parking supply is therefore assumed to provide a surplus of 35 spaces. While existing on-street parking demand includes other uses (i.e., shopping, surplus residential parking, or long term storage (i.e. boat, RV parking), it should be noted that the existing commercial and office land uses within the traffic study area include off-street parking lots that are considered adequate in supporting the employees and patrons of the various tenants.

As noted above, the property acquisitions and access modifications relating to the commercial properties along Nellen Ave. will result in non-conforming on-site parking conditions, affect tenant leasing opportunities and reduce the viability and long term success of these and/or future business ventures at these properties. Additionally, the proposed 65-space Park and Ride Lot cannot replace the 65 street spaces lost due to the project, in that very few of the 65 street spaces lost due to the Project are actually used as commuter parking, but rather are used as general parking. Further, the proposed Park and Ride lot is located only on the east side of US 101, while current on-street parking is distributed on both sides of US 101 which offers residents, shoppers, commuters and other bus riders more flexibility and options for parking depending on their destination. The net loss of available parking spaces is a significant environmental impact that can effect not just parking but transportation and traffic itself as residents and shoppers are forced to circle the block numerous times in order to find a free parking space. These impacts must be analyzed. The document states that there is adequate off-street parking to support employees and patron of the various tenants. There is no supporting analysis,

documented observation or study to reach this conclusion. On the contrary, statements from business operators state that overflow on-street parking is common place and important to the viability of their business.

In addition to the above noted issues, the Town has engaged W-Trans Transportation Engineers, to review and evaluate the transportation related analysis contained in the IS/EA and the Technical reports related thereto. Attached hereto and incorporated herein by reference is the analysis of W-Trans, which concludes that there is inadequate analysis contained in the IS/EA relating to transportation impacts to support the conclusion that the project will not have an adverse effect on the environment. Based thereon, there exists substantial evidence supporting a fair argument that the Project will have a significant effect on the environment relating to transportation.

2.2.5 Traffic and Transportations
2.2.5.3 Environmental Consequences
Build Alternative Design Year 2035
<u>US 101 Future Conditions</u> page 2.2-51
Under the Build Alternative, maximum travel times will decrease by 1 minute and 20 seconds along SB 101 during the morning peak commute hours, and 5 minutes and 57 seconds along NB US 101 during the evening peak commute hours when compared to the No –Build conditions.

Considering one of the primary purposes of this $143,700,000 project is to reduce congestion through the study area (East Blithdale/Tiburon Boulevard to Andersen Drive), Town Council questions this significant outlay of funds, including the construction of the Nellen Avenue fly-over off-ramp, for a savings of 1 minute and 20 seconds during the SB 101 morning peak commute hours.

Further, the IS/EA fails to analyze the impact of vehicles using the flyover and the new exit conditions created by the project as a means of bypassing congested conditions on the freeway segment. It is reasonable to assume a fair number of drivers will use these facilities as a means of driving around congested conditions by getting off and then back on the freeway. This potential impact needs to be evaluated.

2.2.5 Traffic and Transportations
2.2.5.4 Avoidance, Minimization, and/or Mitigation Measures page 2.2-51
During the Plans, Specifications, and Estimates (PS&E) phase of the project, a detailed Transportation Management Plan will be developed to facilitate access during construction. The objective of the Transportation Management Plan will be to minimize the impacts that construction activities will have on the traveling public. The plan will include press releases to notify and inform motorists, business community groups, local entities, emergency services, police, and elected officials of upcoming road closures and detours.

An initial phase of this project will be the reconstruction of the SB 101 on-ramp NB 101 off-ramp at Sir Francis Drake Boulevard. Potential closures of these ramps will cause very significant traffic

congestion and detour requirements for vehicles traveling west-bound and east-bound on Sir Francis Drake. Further, the Avoidance, Minimization, and/or Mitigation Measures proposed in the IS/EA for the project are inadequate to mitigate the impacts. The detour routes are not described and are left to the formulation of a future Transportation and Management Plan, again resulting in an impermissible deferral of mitigation. Further, the impacts associated with this traffic re-routing are not analyzed, therefore it is impossible to ascertain from the IS/EA the additional impacts to traffic on local streets and the freeway segment will result from this re-routing. This is a significant impact.

2.2.6 Visual/Aesthetics

2.2.6.3 Environmental Consequences

<u>US 101 District</u>

Viewpoint #SB: US 101 Southbound (page 2.2-66)

Figure 2-10b provides a photograph of the existing conditions and a visual simulation of the Build Alternative for Viewpoint #SB. The addition of a new braided ramp along the west side of US 101 will partially block views of landscaping to the west and restrict distant views of wooded hills in the background. The removal of trees and shrubs on the west side of US 101 will reduce the dominance of landscaping along the highway. These improvements will make this viewpoint more typical to other segments of the highway corridor, and will increase the dominance of highway infrastructure. The vividness rating will be reduced, whereas the intactness and unity of this view will not change. The overall visual quality rating for Viewpoint #SB will be reduced from moderate/average to moderately low.

The Town Council strongly rejects the appearance of the proposed, towering, out-of-scale, fly-over off-ramp to Wornum Drive and fundamentally disagrees with the document's overall visual quality rating of both the "before" conditions as well as the Conditions After Build Alternative Construction. In the viewpoints depicted in the IS/EA as well as elsewhere in the Town, Town residents and visitors enjoy views of scenic vistas such as Mt. Tamalpais, the shoreline, creek and mature landscaping. These visual resources are important to our community and establish the unique visual character of Corte Madera and its surroundings. This excessively tall fly-over off-ramp is in stark contrast to Corte Madera's low-density, suburban, community character. The proposed fly-over off-ramp is a completely inappropriate transportation design solution for this location. Additionally, the CEQA Environmental Checklist for the Project shows "Less Than Significant with Mitigation" under I. AESTHETICS c) with regard to substantial degradation of the existing visual character or quality of the site and its surrounding without any factual support or analysis thereof. In addition, the Environmental Checklist identifies substantial adverse effects of the project on a scenic vista as less than significant. These conclusions are lacking credible analysis and are not supported by the analysis that is contained in the IS/EA. The replacement of an open view of surrounding hillsides, Mt. Tamalpais, mature trees and other landscaping with views of the towering, concrete, urban flyover clearly and substantially degrades the visual character of the surrounding area, and irrevocably alters the visual and community character of the Town. Further, as is evidenced by the visual simulations contained in the IS/EA, the view of Mt. Tamalpais from surrounding Town streets is significantly and

irretrievably altered, and in some cases obliterated, by the proposed Project. This substantial adverse effect on a scenic vista is significant and unavoidable. In sum, the conclusion that these impacts are less than significant is not supported by the analysis in the IS/EA, the visual simulations or the video simulations available on TAM's website which are a part of the record for this Project. Based thereon an EIR is required.

2.2.6 Visual/Aesthetics
2.2.6.3 Environmental Consequences
<u>Lucky and Fifer District</u>
Viewpoint #LF: Lucky Drive and Fifer Avenue (page 2.2-67)
Figure 2-10c provides a photograph of the existing conditions and a visual simulation of the Build Alternative for Viewpoint #LF. The Build Alternative will add an elevated highway off-ramp over the new at-grade Fifer Avenue ramps. The elevated highway structure will introduce a large visual intrusion that will detract from the existing local street character and impact the overall intactness of this view. The intactness rating will be reduced, whereas the vividness and unity of this view will not change. The overall visual quality rating for Viewpoint #LF will slightly decrease but will still be characterized as low.

Response to Viewpoint #LF is the same response to Viewpoint #SB above.

2.2.6 Visual/Aesthetics
2.2.6.3 Environmental Consequences
<u>Redwood Highway District</u>
Viewpoint #RI: Industrial Way towards US 101 (page 2.2-68)
Figure 2-10d provides a photograph of the existing conditions and a visual simulation of the Build Alternative for Viewpoint #RI. The Build Alternative will construct a new highway ramp and a landscaped slope between Redwood Highway and US 101 in this location. The new highway structure will intrude on the view of Mt. Tamalpais, but Mt. Tamalpais will remain a dominant and memorable visual element. The addition of the landscaped slope in the middle ground will help visually blend with views of the natural areas in the background, unifying the foreground and background. Vegetation will be more dominant whereas views of power lines, light poles, and commercial buildings will be reduced. Unity and intactness will increase. Vividness will remain the same. The overall visual quality rating for Viewpoint #RI will increase from moderate/average to moderately high.

Response to Viewpoint #RI is the same response to Viewpoint #SB above.

2.2.6 Visual/Aesthetics
2.2.6.3 Environmental Consequences
<u>Redwood Highway District</u>
Viewpoint #RH: Redwood Highway (page 2.2-68)

Figure 2-10e provides a photograph of the existing conditions and a visual simulation of the Build Alternative for Viewpoint #RH. The Build Alternative will replace trees and landscaping along US 101with an elevated portion of the proposed Sir Francis Drake Boulevard on-ramp. The walls of the ramp structure will have decorative elements incorporated into the design. Aesthetic treatments will include adding natural marsh images to retaining walls. The new Sir Francis Drake Boulevard ramp structure will block views of US 101, and produce a more organized view of Redwood Highway. This view will become more unified, with visual elements focusing on the local roadway, and views of wooded hills receding into the background. The intactness, unity, and vividness ratings will increase from low to
moderate/average with proposed aesthetic treatments to walls. The overall visual quality rating for Viewpoint #RH will increase from low to moderate/average.

This massive wall structure (400 ft. long and 24 ft. tall) supporting the elevated portion of the proposed off/onramp with an embossed pattern will obliterate the view of Mt. Tamalpais and will be a potential magnet for graffiti, (which could be difficult to remove due to the embossed surface). This is not in keeping with the low-density suburban visual character of the area. Additionally, see response to Viewpoint #SB above. Finally, it would appear that the concrete support structure will block views of the surrounding businesses from the highway, which has the potential to affect the character of the area as a commercial center which may also have an impact on businesses in the area which could cause visual blight due to a downturn in business. This potential impact must be evaluated in an EIR.

2.2.6 Visual/Aesthetics
2.2.6.3 Environmental Consequences
<u>Redwood Highway District</u>
Viewpoint #RW: Redwood Highway and Wornum Drive (page 2.2-68)
Figure 2-10f provides a photograph of the existing conditions and a visual simulation of the Build Alternative for Viewpoint #RW. The proposed improvements will include new at-grade on- and off-ramps to US 101, and a new overpass structure associated with the Sir Francis Draft Boulevard ramp. The walls of the ramp structure will have natural marsh images incorporated into the aesthetic design. The Wornum Drive/Redwood Highway intersection will be improved by adding vehicle turning lanes, bike lanes, and pedestrian crosswalk improvements. Views of Mt. Tamalpais in the background will be blocked by the new overpass structure, reducing the vividness rating. The Build Alternative will increase the contrast between the urban travel ways and natural open space; however, views of highway and roadway elements will become more intact and dominant. The intactness rating of this view will increase slightly. The addition of the proposed street elements will not be consistent with the existing natural environment, but will unify the overall view. Sidewalk and bike trail/lane improvements along Redwood Highway will increase opportunities for users to view the marshes to the east. The overall visual quality rating for Viewpoint #RW will slightly decrease but remain moderate/average.

Response to Viewpoint #RW is the same response to Viewpoint #RH above.

2.2.6 Visual/Aesthetics

2.2.6.4 Avoidance, Minimization, and/or Mitigation Measures page 2.2-72

Mitigation Measure VIS-1: Comply with Local Tree Removal Ordinance. Trees removed from Larkspur, Corte Madera and Greenbrae rights-of-way shall be mitigated through coordination with respective agencies. The specific tree replacement ratio shall be determined during the permit review process ... With the implementation of Caltrans' design standards, aesthetic treatments, and Mitigation Measure VIS-1, visual impacts resulting from construction of the Build Alternative will be reduced from a moderately high impact to a moderate impact, and the Build Alternative will generally maintain the overall visual quality of the study area.

Mitigation Measure VIS-1 (compliance of Local Tree Removal Ordinances) is wholly inadequate to mitigate the visual impacts caused by the removal of trees and construction of the proposed fly-over off-ramp to Wornum Drive. First, the mitigation measure defers to a later date the ratio of tree replacement to be undertaken as part of mitigation and the placement and type of tree to be used. Second, the Lead Agency cannot guarantee the issuance of a tree removal permit from another jurisdiction, nor does the mere issuance of such a permit mitigate the impacts associated therewith. Third, the planting of additional trees cannot serve to mitigate the impact of blocking views of Mt. Tamalpais, as such trees can in no way restore the view. Fourth, the planting of trees cannot mitigate other impacts associated with the visual character of the site and its surroundings since even if the trees could one day soften the view of the fly over structure, such trees would take many, many years to go to a height to provide any mitigation for the monolithic structure. Finally, the IS/EA itself notes that even after the implementation of the inadequate mitigation measure, the visual impacts from construction of the Project will remain "moderate". Thus, it is clear that the visual impacts of the proposed Project are not merely a "Potentially Significant Impact", but it can clearly be seen that absent a substantial re-design of the Project, such impacts are Significant and Unavoidable. An EIR must therefore be prepared.

2.3.1 Hydrology and Floodplain

2.3.1.3 Environmental Consequences

<u>Floodplain Development</u> (page 2.3-6-16)

As previously discussed, the majority of the proposed Build Alternative improvements will be located within a Zone AE type Special Flood Hazard Area. However, because the main profile of US 101 will not change, the Build Alternative does not constitute significant "new" development within the floodplain. In addition, because the surrounding areas are already developed with urban land uses associated with the City of Larkspur and Town of Corte Madera, the Build Alternative will not induce new development to occur within the floodplain beyond what already exists. The Build Alternative would not result in the interruption or termination of a transportation facility that is needed for emergency vehicles or provides a community's only evacuation route in the event of a flood.

In addition to the statement set forth above, the Initial Study Checklist- IX HYDROLOGY AND WATERQUALITY sections c, d, e, h, and i are all checked as less than significant impact and section g is checked as no impact. However, absolutely no analysis is included to support the conclusion above or the conclusions of the checklist. A majority of the project is located in an Area of Special Flood Hazard (AE, 100 year flood elevation of 9, NAVD88) as defined in Corte Madera Municipal Code (CMMC) Title 16. The project will not only be constructed within this floodplain and across existing streams, but will also add impervious surfaces, increasing runoff onto the highway and into adjacent drainage facilities and water bodies. The effects on existing water bodies, and this increased rate and amount of surface water has not been evaluated in the IS/EA. The IS/EA does not provide sufficient information to determine that the project will not result in erosion or siltation and increased runoff which will result in new or increased flooding on the highway or adjacent property and which will exceed the capacity of the drainage facilities in the area. Nor does the IS/EA provide sufficient information to determine that the project components (such as fill; structures, etc.) constructed within the floodplain, including the creek, will not result in an increase in the level of flood waters during the 100-year storm and tidal events. All of the above may result in a dangerous condition to public health, safety and property due to increases in flood heights and/or velocities. In addition, the IS/EA does not provide sufficient information for a determination that the Project will be in full compliance with all requirements of CMMC Title 16.

Section 2.3.1 provides only one option as a solution to the flooding problems which is to raise the elevation of US 101 by twenty feet within the project area. The project fails to recognize a joint agency project developed in the late 1990's that would provide a viable solution to tidal flooding in the area. The agencies involved included the Town of Corte Madera, the County of Marin, and Caltrans. A draft EIR was prepared for the project. Lack of funding was one reason that administrative work on the project was suspended. Construction costs were estimated to be approximately two million dollars. The IS/ES should include this as a viable option for flood control and should identify the environmental impact associated therewith.

The estimated cost to construct the Project is approximately $143,700,000. The Town is astounded that such an ambitious transportation project does not voluntarily address the well-known flooding and ponding locations experienced on the highway within the Corridor. The north-bound lanes of US 101 near the Sir Francis Drake off-ramp regularly and annually flood and pond causing dangerous driving conditions and significantly impact traffic congestion in this location. In addition the southbound off-ramp at Fifer Avenue must be periodically closed due to flooding events. Notwithstanding the finite definition of "new" development within the floodplain cited in the document, new and impervious material will be added in the vicinity of the highway which is subject to frequent flooding, potentially exacerbating an existing flooding condition. This is a significant impact.

Finally, the mitigation identified in section 2.3.1.4 of the IS/EA is completely inadequate. The proposed mitigation defers to some later date the identification of mitigation for floodplain impacts but proposes no quantified objective standard for such future mitigation to meet. As noted above, such mitigation does not meet the legal requirements of CEQA.

2.3.2 Water Quality and Storm Water Runoff
2.3.2.4 Avoidance Minimization, and/or Mitigation Measures.(Page 2.3-14-15)

The identified mitigation measure provides, among other things that "***Work during the rainy season will also be limited to avoid effects to storm water runoff***" The IS/EA does not provide information on the number of construction days necessary for the proposed project, but it is difficult to understand how a schedule could be developed to avoid or limit work during the rainy season on a project of this magnitude. It is therefore not clear if this mitigation measure is feasible. Further, the same mitigation measure provides that "***Work in and around Corte Madera Creek may require a temporary diversion of the Creek's water flow if construction occurs during the rainy season. . .*** It is difficult to see how these two statements in the same mitigation measure can be reconciled. Finally the Design Pollution prevention BMPs proposed as part of this mitigation measure provide merely elements "to be considered" in the future in developing BMPs to mitigate drainage impacts of the project. Again, the mitigation is deferred to a later stage in the project, but no quantitative, objective standards are set forth in the measure, only elements to "consider" including are provided. Therefore, it cannot be determined whether the proposed mitigation will reduce the identified impacts to a level of insignificance.

2.3.5 Hazardous Wastes/Materials

The IS/EA fails to adequately address the loss of emergency access to the WinCup development from Nellen Ave. This loss of emergency access could result in impairment of an emergency evacuation plan for the WinCup development and could potentially significantly impact the safety of residents living at the development. This potentially significant impact must be analyzed.

2.3.7 Noise
2.3.7.2 Affected Environment page 2.3-50
A proposed mixed-use residential and commercial development at 195-205 Tamal Vista residences (also known as the WinCup Development), will be located adjacent to the Study Area. The Town of Corte Madera has approved the preliminary design review plans for the development, which will replace the existing one- and two-story industrial buildings with a three- to five-story mixed use residential and commercial building complex. However, no building permits have been issued for this proposed development. Per Caltrans' traffic noise analysis protocol, if undeveloped lands are planned, designed, and programmed before the date of public knowledge, noise abatement must be considered as part of the transportation project. The date of public knowledge is the date of approval of the final environmental documentation for that transportation project. The date of final approval for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project is the date that the Mitigated Negative Declaration and Finding of No Significant Impact are signed. Land development is considered to be planned, designed, and programmed when the development has received all final discretionary approvals from the local agency with jurisdiction. This is generally

the date that the building permit or vesting tentative map is issued. However, no building permits have been issued for the proposed WinCup development. As such, evaluating the potential project-related noise impacts on the WinCup development would be speculative at this time. The project will prepare a noise analysis and subsequent noise abatement consideration, as appropriate, at the time that all building permits have been issued for the WinCup development.

The WinCup development received demolition permits in December 2012. All on-site demolition of previous warehouse and office buildings has taken place. Construction Building Permits have been issued and construction will likely begin in February 2013. Regardless of the issuance of permits for the construction of the WinCup development, CEQA required an environmental assessment of Noise Impacts on the WinCup development. The Noise Section of the CEQA Environmental Checklist for the Highway Project shows "No Impact" or "Less Than Significant Impact". These Checklist conclusions cannot be made until the necessary analysis is conducted addressing the WinCup development.

In addition to the inadequacy of the noise analysis in omitting analysis of impacts to the WinCup project, the noise analysis contains several additional fatal flaws. First, the significance conclusions and avoidance and mitigation measures are based upon the noise abatement criteria set forth in table 2.3.9 rather than the standard set forth in the Corte Madera General Plan. Second, the mitigation measures as set forth in section 2.3.7.4 appear to suggest that a substantial increase in noise is identified as a greater than 12 dBA increase over existing conditions, such a standard is wholly unreasonable in an environment which contains residents and businesses less than 500 ft. from the noise source. Finally, it appears that the increases in noise as contained in Table 2.3-12 do not differentiate between current noise levels and noise levels projected to exist in 2035 notwithstanding that traffic is projected to increase in the 2035 condition without the project. The analysis therefore does not accurately depict either the current noise with and without the project or the cumulative noise with or without the project.

As a review of Table 2.3-12 indicates, if the Corte Madera General Plan standard for noise exceedance is applied, nearly all of the identified receiver locations are expected to exceed the Corte Madera thresholds of significance. The contribution of the Project to this exceedance is not disclosed as the project condition is never compared to the existing noise condition at the identified receivers.

The noise analysis does not specifically address the potential increased noise levels affecting distant residential enclaves as a result of the proposed raised on-ramp and off-ramp roadways at Wornum Drive, greater vehicle speeds on these roadways and possible noise impacts associated with noise which may result due to the concrete wall structures supporting the raised portions of the of the project.

The proposed mitigation measures identified in section 2.3.7.4 do nothing to mitigate the noise associated with the Project and ultimately conclude that mitigation is not reasonable due to cost considerations. Thus, even without consideration of the inadequacy of the analysis the IS/EA discloses that the noise impacts of the proposed project are significant and unavoidable. An EIR is required.

In addition to the issues identified above relating to noise, the Town has received an expert review and evaluation of the noise analysis contained in the IS/EA. Attached hereto and incorporated herein by reference is the analysis of Charles M. Salter Associates, Inc. dated February 14, 2013, which concludes that there are several notable deficiencies in the noise analysis, including but not limited to inadequate measurement of the character of the existing noise environment.

2.4 Biological Environment

2.4.2.4 Avoidance Minimization, and/or Mitigation Measures

Establish Boundary for Work Area within Sensitive Habitat

The minimization/mitigation measure describes a future plan to establish criteria and specifications for the installation of barrier fencing. Again, this mitigation measure is an inadequate deferral of mitigation pursuant to CEQA.

In Water Work Avoidance Construction Timeline

This minimization/mitigation measure provides that work will be conducted outside the accepted salmon and steelhead migratory period of October 15 through June 15. However, as is noted below, this measure is uncertain since it cannot be performed in conjunction with the mitigation measures relating to California Clapper Rail and California Black Rail and measures requiring the avoidance of construction during the rainy season.

2.4.5 Threatened and Endangered Species

The IS/EA notes that a Biological Assessment (BA) of the impact of the Project on Threatened and endangered species has yet to be prepared. However, the ISEA acknowledges that construction of the proposed project may take place within an area of critical habitat for the Central California Coast Steelhead, Central California Coast Coho Salmon, and North American Green Sturgeon, and within areas that may provide habitat to the Longfin Smelt, Central Valley Chinook Salmon, Tidewater Goby, California Clapper Rail, California Black Rail and Salt Marsh Harvest Mouse. In advance of the preparation of the BA, it is impossible to determine the complete and full nature of the impacts to these species and the required mitigation.

Nevertheless, the IS/EA notes that there will be permanent impacts to Corte Madera Creek as a result of the Project and that the project is likely to adversely affect the Salt Marsh Harvest Mouse and the California Clapper Rail as well as impacts to the critical habitat identified above. See Table 2.4.6.

The Avoidance, Minimization and/or Mitigation Measures for these identified impacts as contained in section 2.4.5.4 do not fully mitigate the identified impacts. The creation of a fish Passage, may serve

to mitigate impacts to individual fish but does nothing to mitigate the identified impacts to habitat, including critical habitat. Likewise, dewatering will create impacts to habitat during the dewatering process and possibly beyond until biological values are re-established. The presence of a biologist during the dewatering process to salvage individual fish, while absolutely necessary and responsible, again does nothing to mitigate impacts to habitat.

Finally, as noted above, and as admitted in IS/EA, the mitigation measure identified for the California Clapper Rail, California Black Rail, (construction avoidance between February 1 and June 30) cannot co-exist with the identified mitigation measure for impacts to the endangered fish species (construction avoidance from October 15 through June 15) and the avoidance of the rainy season October 15, through April 30). As noted by the IS/EA, "it is not feasible to construct the proposed project and avoid the breeding, migration and rainy season". The IS/EA proposes to resolve this conflict by ignoring the avoidance mitigation for the Clapper Rail and Black Rail and instead conducting pre-construction surveys and procedures to follow in the event that the species is encountered. However, the mitigation measure does not identify what conditions would result in authorization to proceed with work in the event the species is encountered and whether such authorization would result in a significant adverse impact to the Clapper and/or Black Rail. As such, the identified mitigation measure cannot be determined to mitigate this impact to a level of insignificance. Therefore, an EIR is required.

In addition to the issues identified above relating to biological impacts, the Town generally supports the comments of the Shute, Mihaly & Weinberger letter, submitted on behalf of the Marin Audubon Society, including the memoranda submitted by Leonard Liu and Mike Podlech attached thereto.

In conclusion, the Town Council fundamentally opposes the design and appearance of the proposed freeway project and we find that the Initial Study/Proposed Negative Declaration for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project incorrectly concludes that the Project would not have a significant effect on the environment. The Town Council believes it has herein provided substantial evidence supporting a fair argument that the Project will have a significant effect on the environment and, therefore, a full EIR is required.

Sincerely,

Diane Furst

Diane Furst, Mayor, Town of Corte Madera

Attachments:

1. Memorandum from the Corte Madera Accessibility Advisory Committee
2. Correspondence from W-Trans re-evaluation of the Traffic Analysis
3. Correspondence from Charles Salter re-evaluation of the Noise Analysis

ACCESSIBILITY ADVISORY COMMISION

MEMORANDUM

THE TOWN OF CORTE MADERA
MARIN COUNTY CALIFORNIA

To: Town Manager

From: Accessibility Advisory Commission (AAC)

Date: 1/31/2013

Subject: Hwy 101 Greenbrae/Twin Cities Corridor Improvements

At the January 30, 2013 meeting of the Accessibility Advisory Commission, the Draft Environmental Document for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project was discussed as a "new business" agenda item. The Commission understands that the Town will be submitting a comment letter concerning this draft environmental document, and would like to bring attention to several accessibility related concerns that were identified during the discussion of this topic. These concerns are outlined below:

- The increased distance between the northbound bus stop and the southbound bus stop creates a potential hardship for those users with mobility issues.
- Depending upon the grades (longitudinal slope) chosen for the proposed Nellen Avenue sidewalk, this route may present a hardship to those users with mobility issues.
- The path of travel along Wornum Drive presents the potential for pedestrian/bicycle conflicts due to the proposed shared use of the routes provided.
- The path of travel along Wornum Drive presents the potential for pedestrian/vehicle conflicts due to the number of street crossings needed to reach various destinations.
- The number of traffic signals proposed along the Wornum Drive route could create increased "wait" times for both vehicles and pedestrians if signal timings account for those users with mobility issues.
- The configuration of the Wornum Drive/Redwood Hwy intersection could lead to confusion for sight-impaired pedestrians due to the number of proposed traffic signals and median islands.
- The proposed widening of the Corte Madera Creek overcrossing presents the potential for pedestrian/bicycle conflicts due to the shared use of this route.

The Commission thanks you for your consideration of these items during the preparation of the Town's comment letter.

Sincerely,

Robert Czeck, Chairman

w-trans

Whitlock & Weinberger
Transportation, Inc.

490 Mendocino Avenue
Suite 201
Santa Rosa, CA 95401

voice 707.542.9500
fax 707.542.9590
web www.w-trans.com

February 8, 2013

Town Council
Town of Corte Madera
300 Tamalpais Drive
Corte Madera, CA 94925-1592

Comments on the *Highway 101 Greenbrae/Twin Cities, Corridor Improvement Project, Initial Study*

Dear Town Councilmembers;

As requested, Whitlock & Weinberger Transportation, Inc. (W-Trans) has reviewed the subject document and supporting traffic studies to ensure that the analysis is complete and addresses all of the potential impacts to Town of Corte Madera streets. The following documents were reviewed prior to preparing these comments.

- *Highway 101 Greenbrae/Twin Cities, Corridor Improvement Project, Initial Study*, State of California Department of Transportation, December 2012
- *Highway 101 Greenbrae/Twin Cities Corridor Improvements, Project Approval/Environmental Document, Final Traffic Operations Report*, (TOR) Transportation Authority of Marin, April 12, 2012
- *Local Streets and Roadways Study*, (LSRS) Fehr & Peers, March 2012

Pedestrian Access

As a pedestrian improvement, one of the items on Page 1-18 of the Initial Study is noted as, "Removing the existing non-ADA compliant pedestrian overcrossing near Lucky Drive/Nellen Avenue." While this structure is non-compliant, it is unclear how removing it is seen as improving pedestrian access since it can still be used by the overwhelming percentage of the population that is not disabled. It is clear that it needs to be removed to allow the project to proceed, but this finding is clearly false, even though the following footnote is provided: "Caltrans is committed to carrying out the 1990 Americans with Disabilities Act (ADA) by building transportation facilities that provide equal access for all persons. The same degree of convenience, accessibility, and safety available to the general public will be provided to persons with disabilities." Caltrans is to be applauded to committing to carrying out the ADA, but it does not seem reasonable to conclude that reducing access for non-disabled persons is a net benefit in terms of pedestrian access, as it clearly is not a benefit. This impact on pedestrian access is potentially significant, and should be evaluated as such.

Freeway Operation

The primary purpose of the proposed project is to improve operation along a segment of freeway that is currently congested due to closely spaced ramps and the resulting merging movements. However, upon careful review of the proposed design, it appears that some of the issues have merely been moved downstream, but not resolved.

On Page 31 of the TOR, the project is described as including the following improvements:

- Widening the existing southbound US-101 / Sir Francis Drake Boulevard off-ramp to two lanes.

- Widening the existing southbound US-101 / Sir Francis Drake Boulevard on-ramp to two lanes as it crosses Corte Madera Creek and reconfiguring the Fifer Avenue on and off ramps. The reconfigured Fifer Avenue off-ramp will not have a direct connection from US-101 but will only be accessible from the southbound Sir Francis Drake Boulevard on-ramp.

- Constructing an auxiliary lane from the realigned Fifer Avenue/Sir Francis Drake Boulevard on-ramp, thru the Madera Boulevard hook ramps, to the Tamalpais Drive off-ramp, ending the auxiliary lane between the off-ramp and the loop on-ramp from westbound Tamalpais Drive.

A review was made of the simulation available on the TAM website (www.tam.ca.gov) as well as plans for the actual striping associated with the new US 101 Southbound ramps from Sir Francis Drake Boulevard and Fifer Avenue. As proposed there would be widening to provide two lanes coming from Sir Francis Drake Boulevard (the first two bullet points above), but there was no discussion in the traffic report about what happens to those two lanes between Corte Madera Creek and the point at which they merge onto US 101 South. Based on the striping, it appears that the proposal includes a short HOV lane (third lane) on the southbound ramp facility at Fifer Avenue, south of which all three lanes appear to merge into a single lane in a distance of about 200 feet. Though the report specifically states that ramp metering was not assumed, it is clear that three lanes of freeway-speed traffic cannot merge into one without some kind of metering device. Any improvements gained by adding lanes across Corte Madera Creek would be lost at the point where the ramp returns to a single lane, and if metering is used, as appears necessary, it seems likely that the resulting congestion for this movement would be substantially worse than it is today.

This condition is further exacerbated by the merging of the single on-ramp lane for traffic coming from Sir Francis Drake Boulevard with that coming from Fifer. Again, based on the plans provided which include a limit line in each of the two lanes, it would appear that metering is anticipated. If, in fact, this is the intent, drivers coming from Sir Francis Drake Boulevard would be subjected to stopping at two metering lights in lieu of the current condition wherein they merge straight onto US 101 South. While it is clearly a superior condition for drivers traveling straight through on US 101, the benefit to drivers entering from Sir Francis Drake Boulevard is not as apparent.

The operation of this on-ramp, which widens from two lanes to three, decreases almost immediately to one lane, merges with an adjacent lane and finally merges onto the freeway, does not appear to have been fully evaluated in the traffic analysis, and based on the discussion above, there are potentially significant impacts that must be evaluated and addressed.

Under existing conditions there is an auxiliary lane on southbound US 101 that extends between Madera Boulevard and Tamalpais Drive, where it is currently an exit-only lane. The plans for the project show the auxiliary lane extending about 500 feet beyond Tamalpais Drive, at which point traffic from the loop on-ramp merges onto the freeway, as noted in the third bullet point above. According to the *Traffic Operations Report,* "On US-101, a key goal is reducing the congestion under existing and future year conditions by alleviating the short merging, diverging and weaving areas." Despite this stated goal, the proposed changes to the lane configuration on southbound US 101 at Tamalpais Drive result in another short merge section, and operation deteriorates to LOS E under the 2035 "Build" conditions versus LOS D for the "No-Build" scenario (TOR, Page 69, Table 29). Since LOS E operation does not meet the applicable standard, this is a significant impact, and must be addressed through an EIR process.

Items Not Covered

The preferred alternative results in the need to close Nellen Avenue north of Fifer Avenue. This street connection currently serves trips to and from the commercial enterprises north of Fifer Avenue, so these trips will be diverted to Lucky Drive, and its intersection with Fifer Avenue, which is already congested during the morning peak period. Because the project will negatively impact operation at the intersection of Fifer Avenue/Lucky Drive, this intersection must be evaluated.

Construction of the project will result in both short-term changes to freeway and side street capacity as well as the generation of a substantial number of truck and other trips. Neither the *Final Traffic Operations Report* nor the *Local Streets and Roadways Study* provide any information on the potential impacts of construction activities. It is reasonable to conclude that there could be a potentially significant impact associated with this aspect of the project, so it should be evaluated.

On Page 55 the TOR says, "The auxiliary lane will provide additional capacity for the mainline weave section between Tamalpais Drive and Sir Francis Drake Boulevard to allow vehicles to enter and exit the freeway more easily." Page 70 of the same report notes that, "In addition to these improvements in operations, the Build Alternative would:

- Serve approximately 30 percent more vehicles north of Sir Francis Drake Boulevard during the AM peak hour.
- Serve approximately 15 percent more vehicles south of the Sir Francis Drake Boulevard interchange during the AM peak hour and about six percent more vehicles during the PM peak hour."

From these statements it can be concluded that the project results in additional capacity on the freeway network, which could have growth inducing impacts. Such impacts were neither addressed nor studied.

Conclusions

In the "Determination" section of the Mitigated Negative Declaration (Page 7 of 46 in the on-line version of the Initial Study), it notes that the project has "no effect on ... traffic and transportation." The following paragraph notes that the project would "have no significant effect on ... traffic and transportation ...." Based on the information presented above, it is clear that there is inadequate proof to support this statement, and further analysis is required in order to provide full disclosure of potential traffic and transportation impacts.

Please feel free to contact me if you have any questions regarding these comments.

Sincerely,

Dalene J. Whitlock, PE, PTOE
Principal

REGISTERED PROFESSIONAL ENGINEER
DALENE J. WHITLOCK
TR001552
Exp. 9/30/14
TRAFFIC
STATE OF CALIFORNIA

DJW/djw/CMA043.L1

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14 February 2013

195-205 Tamal Vista Boulevard LLC
c/o MacFarlane Partners
Attn: Britt Wenzler
201 Spear Street, 14th Floor
San Francisco, CA 94105

Subject: **Highway 101 Greenbrae/Twin Cities Corridor (GTCC) Project – Acoustical Analysis of Impacts on 195-205 Tamal Vista Boulevard**
CSA Project: 13-0058

Charles M. Salter, PE
David R. Schwind, FAES
Robert P. Alvarado
Eric L. Broadhurst, PE
Philip N. Sanders, LEED AP
Anthony P. Nash, PE
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Brian C. Wourms
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Shanna M. Sullivan
Amanda G. Higbie
Brian J. Good
Heather A. Salter
Dee E. Garcia
Catherine F. Spurlock
Marva De Vear - Noordzee
Elizabeth F. Trocker
Jennifer G. Palmer
Jodessa P. Gregorio
Susan E. Lonergan
Heather D. Heise
Courtney H. Vineys
Erin D. Gorton

Dear Britt:

As requested, we reviewed public documents related to the GTCC project. The purpose of our review was to determine the sufficiency of the noise analysis included in environmental documents, with a focus on whether noise impacts on the 195-205 Tamal Vista Boulevard project are adequately addressed.

EXECUTIVE SUMMARY

- TAM's noise study only performed four non-concurrent short-term and one long-term acoustical measurement for the entire corridor under study. No measurements were conducted at the site of 195-205 Tamal Vista Boulevard. We question the adequacy of this measurement program to fully capture the character of the noise environment, particularly on the west side of Highway 101 at Wornum Drive
- The Transportation Authority of Marin (TAM) noise study report (NSR) did not study the site of 195-205 Tamal Vista Boulevard (formerly the WinCup factory)
- The TAM NSR did not evaluate effects from maximum noise levels that would occur when trucks or other vehicles decelerate (e.g., downshifting, air brakes) while taking the southbound Wornum Drive off-ramp
- TAM should study noise impacts on the 195-205 Tamal Vista Boulevard residences related to traffic noise, including traffic and vehicle deceleration on the Wornum Drive off-ramp, and should evaluate any mitigation measures would reduce those impacts
- Noise from certain potential highway construction activities at the nearby future residences at 195-205 Tamal Vista Boulevard are predicted to be significantly louder than local traffic noise levels; TAM should analyze whether any mitigation measures would reduce those impacts
- Further analysis and consideration of mitigation measures should be undertaken as outlined in our Recommendations

PROPOSED GTCC PROJECT

The Transportation Authority of Marin (TAM) proposes to renovate several segments of Highway 101 between Corte Madera Creek on the north and Tamalpais Drive on the south. The segment of the project that could potentially affect the 195-205 Tamal Vista Boulevard multifamily residential/mixed-use project is the proposed new off-ramp from southbound Highway 101 onto Wornum Drive. This arterial roadway comprises the southern property line of 195-205 Tamal Vista Boulevard. The exit ramp would cross over Nellen Avenue, located between 195-205 Tamal Vista Boulevard and Highway 101. Portions of the ramp would be elevated above Highway 101 and Nellen Avenue, and be near the

elevation of the 195-205 Tamal Vista Boulevard project[1]. The new exit would be used by approximately 740 cars per hour during peak times in the morning[2].

REVIEW OF PROJECT DOCUMENTS

We reviewed the following GTCC documents:

- Noise Study Report (NSR) Document dated June 2011 (04-MRN-101-7.2/8.9)
- Letter to Town of Corte Madera and City of Larkspur from TAM dated 1 February 2013 regarding visual impacts
- Excerpts from the TAM Environmental Document regarding visual impacts and scenic resources
- Charles M. Salter Associates EIR review letter for Town of Corte Madera General Plan dated 3 November 2011
- Charles M. Salter Associates environmental noise study for 195-205 Tamal Vista Boulevard dated 3 November 2011

ANALYSIS OF PROPOSED GTCC PROJECT NOISE

1. 2011 On-Site Acoustical Measurements

Charles M. Salter Associates conducted acoustical measurements at the 195-205 Tamal Vista Boulevard in September 2011. The measurements quantified site noise levels. This data was used to determine design features, such as window STC[3] ratings, necessary to meet State Code and Town General Plan requirements for interior and exterior noise.

The day-night average (DNL[4]) noise level at the site facing Highway 101 at the 195-205 Tamal Vista Boulevard project setback was DNL 73 dB. 1 dB was added to the measured level to account for future traffic growth (for a total of DNL 74 dB), consistent with the Town of Corte Madera's General Plan.

2. Review of GTCC Project Traffic Noise Measurements

TAM's Noise Study Report (NSR) summarized acoustical measurements conducted at five locations between Corte Madera Creek and Tamalpais Drive in 2009 and 2010. Four measurements in 2009 were non-concurrent and short-term (1 hour or less). There was also one 24-hour measurement conducted in 2010 to determine overall traffic patterns. Locations were selected by TAM to be near sensitive receivers. The NSR noted 120 sensitive receiving properties, designated R1 to R120 from north to south.

---

[1] Letter from TAM to City of Larkspur and Town of Corte Madera, dated 1 February 2013.

[2] Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Noise Study Report, June 2011 (amended October 2012), Page 47.

[3] Sound Transmission Class (STC) — A single-figure rating standardized by ASTM and used to rate the sound insulation properties of building partitions. The STC rating is derived from laboratory measurements of a particular building element and as such is representative of the maximum sound insulation.

[4] Day-Night Average Sound Level (DNL) – A descriptor established by the U.S. Environmental Protection Agency to describe the average day-night level with a penalty applied to noise occurring during the nighttime hours (10 pm - 7 am) to account for the increased sensitivity of people during sleeping hours.

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No measurements were conducted at the site of 195-205 Tamal Vista Boulevard. Based on the number, timing, and locations of the short-term and long-term measurements, we question the adequacy of the noise measurement program as it relates to the number of potential receivers.

Although it is true that acoustical measurements do not need to be conducted at all 120 sensitive receivers to accurately predict noise potential impacts, nonetheless there was a large gap in the measurement locations on the west side of Highway 101 which included the 195-205 Tamal Vista Boulevard site. If 195-205 Tamal Vista Boulevard had been included as a sensitive receiver, the site would be one of the largest (if not the largest) within the studied corridor.

Additionally, Table 2.3-12 in the TAM Environmental Document suggests that existing and no-build alternative (2035) noise levels are predicted to be equal. However, NSR Appendix A (Traffic Data) includes tables showing AM and PM peak hour traffic volumes for mainline freeway segments and ramps, and it appears that in many cases, there is a difference between existing and no-build alternative traffic volumes. The NSR and TAM Environmental Document do not explain why it is assumed that existing and no-build alternative noise levels are predicted to be equal even where traffic volumes are different.

TAM Measured Traffic Noise Data

TAM's Location M2 (page 25 of the NSR) is shown to be the closest to the site of 195-205 Tamal Vista Boulevard, albeit on the other side of the freeway (northbound). TAM's Location M3 is south of the project site on the west side of the highway.

Short-term measured data showed that the hourly Leq noise level during afternoon commute (assumed to be peak hour) at location M2 was 73 dBA[5]. Our acoustical measurement data from 2011 showed similar peak hourly Leq[6] levels at the 195-205 Tamal Vista Boulevard setback along Highway 101 and Nellen Avenue. Measured levels are higher than the NSR's Noise Abatement Criteria (NAC) from Caltrans, described in NSR Chapter 4. The NSR applies Caltrans' "Category B" criterion of 67 dBA hourly Leq at residential exterior spaces due to project noise.

3. Analysis of GTCC Wornum Drive SB Off-Ramp Noise Impacts

Traffic Noise from Southbound Wornum Drive Off-Ramp

Analysis of traffic noise impacts on the 195-205 Tamal Vista Boulevard residences associated with the proposed Wornum Drive SB Off-Ramp were not included in the NSR. According to the NSR, the new off-ramp would be used by approximately 740 cars per hour during peak AM times.

[5] dBA – A-Weighted sound pressure level (or noise level) represents the noisiness or loudness of a sound by weighting the amplitudes of various acoustical frequencies to correspond more closely with human hearing. A 10-dB (decibel) increase in noise level is perceived to be a doubling of loudness. A-Weighting is specified by the U.S. EPA, OSHA, Caltrans, and others for use in noise measurements.

[6] L_{eq}--The equivalent steady-state A-weighted sound level that, in a stated period of time, would contain the same acoustic energy as the time-varying sound level during the same period.

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Vehicle Deceleration from Southbound Wornum Drive Off-Ramp

Analysis of maximum noise from decelerating vehicles on the exit ramps was not included in the NSR. There would be noise emissions from downshifting traffic decelerating on the southbound off-ramp as it slopes downwards to meet Wornum Drive. Maximum impulsive noise levels from truck air brakes, downshifting, or other deceleration phenomena are 10 dBA (or more) louder than typical vehicle noise[7]. Under most circumstances vehicle noise decreases as the vehicles' speed decreases. These potential effects on nearby receivers (e.g., the potential for sleep disturbance in nearby residences) were not studied by the NSR.

4. GTCC Construction Noise Analysis

Chapter 8 (page 42) of the NSR provided an overview of potential project construction equipment, with associated noise levels at 50' from the source (in dBA). Levels range from 55 dBA for a pickup truck to 95 dBA for pile driving.

The Study states that the proposed southbound Wornum off-ramp construction will comply with applicable local, state, and Federal regulations for construction hours and noise control. The Town of Corte Madera's construction noise requirements stipulate limited hours of operation for construction, between 7:00am and 5:00pm on weekdays and 10:00am to 5:00pm on the weekends. There is no Town quantitative requirement for construction noise or equipment.

The Study also includes requirements for Caltrans' contractor to implement "appropriate" noise control measures, including local barriers, special locations for stationary equipment, turning off idling equipment, scheduling activities for daytime hours, and notification of nearby residents.

The closest setback of 195-205 Tamal Vista Boulevard residences project site is approximately 150' west of the centerline of the proposed off-ramp. This would be perceived as a halving of loudness. However, depending on the type and location of construction activity, levels from the louder equipment (e.g., pile driving) would be up to 85 dBA at the nearest receiver. Given the proximity of the 195-205 Tamal Vista Boulevard site to construction activities associated with the proposed Wornum Drive off-ramp, we recommend that TAM further analyze construction noise impacts on the residences, and that additional mitigation measures that could reduce those impacts be considered by TAM.

RECOMMENDATIONS

1. The TAM NSR should be amended to include additional noise measurement data for the segment of Highway 101 adjacent to 195-205 Tamal Vista Boulevard. Because the hourly noise level is higher than the Caltrans Category B criterion, we would recommend that TAM undertake further analysis to determine whether this impact is significant under CEQA, and that mitigation measures to reduce those impacts be considered.

2. The TAM NSR should be amended to include predicted noise impacts from the southbound Wornum Drive exit, including traffic and vehicle deceleration noise impacts. Assessments should be made as to the feasibility of a noise barrier along the exit facing west or other means to reduce noise emissions from decelerating vehicles coming down from the ramp as they approach Wornum

[7] Chapter 3 of the NSR describes human response to change in noise levels. A 10-dB change in noise would be considered to be twice as loud.

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Drive, in addition to other mitigation measures that would reduce these noise impacts. We recommend that TAM undertake further analysis to identify these noise impacts, and that TAM consider mitigation measures that could reduce those impacts.

3. The TAM NSR and Environmental Document should be revised to include an explanation of why it is assumed that the "existing" and "2035 no build alternative" noise conditions are predicted to be equal throughout the study area, in light of the differences in AM and PM peak hour traffic volumes on mainline freeway segments and ramps for existing and no-build alternative scenarios[8].

4. Because the hourly noise level is higher than the Caltrans Category B criterion stated in the NSR, we recommend that TAM undertake further analysis to determine whether traffic noise impacts are significant under CEQA, and that TAM consider mitigation measures that could reduce those impacts.

5. Because the 195-205 Tamal Vista Boulevard project site would be immediately adjacent to the Wornum Drive off-ramp construction site, TAM should further analyze construction noise impacts on these residences and consider any additional mitigation measures that could reduce such impacts. The authority having jurisdiction should implement a construction noise monitoring program for the Wornum Drive off-ramp and potentially other segments to be built near residences. Noise monitoring is often used to log construction activity noise and compare it to local ambient conditions or other criteria as adopted by a jurisdiction. Events that exceed criteria are identified by the monitoring equipment and the contractor is notified of the exceedances.

6. Caltrans should investigate the efficacy of "quiet" pavement technologies for the SB Wornum Drive off-ramp. Such pavements have been shown in studies around the world to be capable of reducing tire-road noise by 3 dBA or more, which is considered to be a "significant" change in roadway noise. Caltrans' May 2011 Traffic Noise Analysis Protocol[9] states that they are actively evaluating quiet pavement technologies.

7. Based on the outcome of the further analysis recommended in this report, TAM should determine whether any other mitigation measures would reduce noise impacts associated with construction and operation of the GTCC.

* * *

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[8] Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Noise Study Report, June 2011 (amended October 2012), Page 47.

[9] http://www.dot.ca.gov/hq/env/noise/pub/ca_tnap_may2011.pdf.

This concludes our current comments on the subject project. Please call with any questions.

Sincerely,

CHARLES M. SALTER ASSOCIATES

Ethan Salter, PE, LEED AP
Principal Consultant

cc: Paula Kirlin
Holland & Knight
Email: paula.kirlin@hklaw.com

ES/CMS/es
2013_02_14 Hwy 101 GTCC Project Acoustical Noise Review Letter

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Charles M. **Salter**
ASSOCIATES INC.

January 18, 2013

The Honorable Governor Jerry Brown
Office of the Governor
State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor Brown,

You may recall the Russian River Appreciation Festival at my Hop Kiln Winery near Guerneville, where I introduced you to wine growers and river guardians. Before that I was briefly your family physician when your parents were visiting in Kentfield. I am currently a neighbor of your sister in Belvedere. I wrote the book, Saving the Marin-Sonoma Coast, founded Audubon Canyon Ranch and the Marin Environmental Forum.

I am asking your help to eliminate a poorly planned blight on Marin County's businesses, residences and ecologically important wetlands including the Corte Madera Creek and Shorebird Marsh adjacent to the Corte Madera State Ecological Reserve.

The project is named the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project.

Caltrans intends to construct a new 50' flyover off-ramp in the southbound direction as a way of diverting traffic leaving the freeway. This ramp, along with new elevated ramps in the northbound direction, create a very tall series of freeway structures more reminiscent of Los Angeles. Surely we can do better.

This project is expected to cost the taxpayers $142 million, yet does nothing to increase capacity, and appears to do little to alleviate traffic gridlock on West and East Sir Francis Drake Boulevard. East Sir Francis Drake Boulevard is a main thoroughfare to and from the Richmond/San Rafael Bridge, serves San Quentin State Prison, the Larkspur Ferry Terminal, and the future Sonoma Marin Area Rail Transit station at Larkspur, with upwards of 900 new housing units planned for the immediate area. For $142 million to be invested in a freeway project that will not appreciably address the traffic congestion in this area seems shortsighted to me. The proposed project also does not address the flooding problems on the northbound off-ramp that occurs regularly with every winter storm, nor anticipated sea level rise.

In addition to concerns with the freeway structure, there is significant opposition to the removal of an older, dedicated bicycle/pedestrian overcrossing above Highway 101. Those users will be redirected to a vast new intersection with multiple crossings. The existing, safe overcrossing is used by schoolchildren and transit commuters, and should be retained or replaced.

Caltrans and the Transportation Authority of Marin have issued a Proposed Mitigated Negative Declaration on this project, in lieu of a full Environmental Impact Report. I believe this is in violation of CEQA, and it appears there is opposition from community members who will request a full EIR be completed.

This huge freeway project is simply not appropriate for this community, and the way in which Caltrans is proceeding is not adequately addressing the concerns of the community. I ask that you personally intervene to ensure that Caltrans immediately halt this process, and return with a project more in keeping with the community's concerns and values.

Sincerely,

Martin Griffin
39 Peninsula Road
Belvedere, CA 94920

cc: Diane Furst
Mayor, Town of Corte Madera
300 Tamalpais Drive
Corte Madera, CA 94925

Caltrans District 4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

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February 14, 2013

Caltrans District 4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660
Email: valerie_shearer@dot.ca.gov

Re: Highway 101 Greenbrae/Twin Cities
Corridor Draft Environmental Document

Dear Ms. Shearer:

Friends of Corte Madera Creek Watershed is a volunteer, non-profit group formed in 1995. We work to protect and enhance the natural resources of the Corte Madera Creek Watershed; flooding and the impacts of sea-level rise are also concerns.

The following comments address some specific issues relating to the draft environmental document pertaining to biological resources, water quality and hydrology, and flooding.

1. First on page 1-25 and then throughout the document, the Corte Madera Ecological Reserve, owned by the California Department of Fish and Wildlife, is incorrectly called a "Preserve." Note also that on January 1, 2013, the California Department of Fish and Game was renamed the California Department of Fish and Wildlife.

2. The document is skimpy in its coverage. Although over the years a number of alternatives have been considered, it is not appropriate for a project of this scope to have such a limited discussion of alternatives. A full Environmental Impact Report/Environmental Impact Statement should be prepared.

3. The document acknowledges in Section 2.3.1 that the project is located in the 100-year flood plain; that is without acknowledging that rising sea level will expand the 100-year flood plain. A technicality has been used to justify ignoring the flooding, namely the sentence on page 2.3-6: "However, because the main profile of US 101 will not change, the Build Alternative does not constitute significant "new" development within the floodplain." It is irresponsible to spend millions of dollars on a major project that does not address ways to reduce flooding on the highway.

4. Page 2.3-16 lists BMPs, including two that call for erosion control features to be installed. What form will this erosion control take?

5. The description of the Biological Study Area (BSA) is superficial. On page 2.4-1, this statement occurs: "Within the BSA, only small portions of remnant marsh habitat exist along the edges of Corte Madera Creek, which have been manipulated or hydrologically altered using tide gates (see Figure 2-17)."

   This statement is accurate only for the southern shore of Corte Madera Creek. The north shore has been modified by the transportation infrastructure, but there are no tide gates. A remnant of salt marsh vegetation persists along the north shore and it provides a narrow, but valuable habitat linkage between the breeding populations of California clapper rails downstream of the BSA at the Corte Madera Ecological Reserve and the marsh south of the Larkspur Ferry Terminal and those upstream of the BSA at Piper Park and Hal Brown Park.

6. The partial paragraph at the top of page 2.4-8 ends with the sentence: "Upon completion of construction, the area will be allowed to naturally return to pre-construction conditions." Because disturbed areas are easily colonized by invasive plants, they should be inspected and treated twice annually for invasive marsh plants, particularly invasive cordgrasses (*Spartina densiflora*, *S. alterniflora*, and hybrids of both with the native *S. foliosa*).

7. Table 2.4-7 includes a list of High Priority Noxious Weeds. In addition to *Spartina densiflora*, this section of the table should include *S. alterniflora*, and hybrids of *S. densiflora* and *S. alterniflora* with *S. foliosa.* Efforts to eliminate all of these invasive cordgrasses have been underway in Corte Madera Creek since 2003 and in the BSA since 2005.

8. The measures to be implemented to protect sensitive biological resources are left to the various permits and approvals (e.g., the Biological Opinion, Streambed Alteration Agreement, Section 404 Certification). We would like to review the details of take avoidance and minimization and the compensation required for unavoidable impacts.

In summary, this project seems to give short shrift to impacts on the natural environment, while providing limited benefits to the communities affected—and indeed to all freeway users in that the flooding issue has been ignored.

Sincerely,

Sandra Guldman

Sandra Guldman, President

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February 14, 2013

Via E-mail (valerie_shearer@dot.ca.gov)

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Re: Comments on Highway 101 Greenbrae/Twin Cities Corridor Improvement Project (GCIP) Initial Study (With Proposed Mitigated Negative Declaration)/Environmental Assessment, December 2012 (MND)

Dear Ms. Shearer:

This letter transmits comments on behalf of our client, 195-205 Tamal Vista Boulevard LLC, the owner of the 195-205 Tamal Vista Boulevard project in Corte Madera (Project), regarding the GCIP MND/EA. The MND does not adequately study the environmental impacts of the GCIP as required by the California Environmental Quality Act (CEQA). For the reasons described below, as well as the issues raised by other commenters, the California Department of Transportation (Caltrans), as lead agency under CEQA, in cooperation with the Transportation Authority of Marin (TAM), must prepare a full Environmental Impact Report (EIR) analyzing the potentially significant impacts of the GCIP, including noise and visual and aesthetics impacts to our Project, as well as mitigation measures to reduce those impacts and a reasonable range of project alternatives.

1. <u>CEQA Requires Caltrans to Prepare an EIR to Study the Potentially Significant Environmental Effects of the GCIP</u>.

Caltrans proposes to rely on an MND to approve the GCIP. An MND is only appropriate under CEQA where potentially significant effects of a project have been identified, but revisions in the project plans or mitigation measures would avoid or mitigate the effects to a point where *clearly* no significant effect on the environment would occur, and there is no substantial evidence that the project, as revised, may have a significant effect on the environment. (Cal. Pub. Res. Code § 21064.5; CEQA Guidelines §§ 15063(b)(2) & 15070)

The GCIP is a major regional transportation project with an estimated construction cost of approximately $143,700,000 that proposes improvements including: the modification, realignment, addition, and/or removal of US 101 on- and off-ramps; construction of new auxiliary lanes and collector-distributor roadways; construction of retaining walls and/or concrete barriers where there are grade differences between roadways; construction of new transit, bicycle, and pedestrian facilities; and traffic signal coordination at ten roadway intersections. (MND, p. 1-14). Our Project will be particularly impacted by the proposed new southbound US 101/Wornum Drive off-ramp adjacent to our site.

Caltrans and TAM have consistently represented to the public for years that an EIR would be prepared to study the impacts of the GCIP. Caltrans issued a Notice of Preparation for the GCIP on September 19, 2009.[1] TAM and Caltrans held a public open house and Scoping Meeting on September 29, 2009, and the meeting notice stated that an EA/EIR will be prepared for the GCIP.[2] At the November 19, 2009 TAM Board Meeting, Bill Whitney announced the beginning of the EIR process for the GCIP. The November 19, 2009 TAM Staff Report stated that on September 17, 2009, Caltrans released the Notice of Preparation of a *Draft EIR* for the GCIP.[3]

Our client and other community members who will be impacted by the GCIP have been anticipating that Caltrans and TAM would prepare an EIR to inform the public about the potential significant environmental impacts of the GCIP. We have been looking forward to the opportunity to review and comment on the draft EIR, in accordance with CEQA's requirements for public participation.

The MND is simply inadequate under CEQA because it improperly omits analysis of certain environmental impacts and includes technically flawed and incorrect information. Furthermore, for reasons outlined below and in the Town of Corte Madera's comment letter dated February 14, 2013(Corte Madera Letter), the proposed GCIP improvements will have significant environmental effects under CEQA. It is improper for Caltrans and TAM to rely on an MND to approve the GCIP. Caltrans, as lead agency, must prepare an EIR analyzing the potentially significant environmental impacts of the GCIP. (Cal. Pub. Res. Code § 21061; CEQA Guidelines §§ 15063(b)(1) & 15064(a)(1)).

2. <u>CEQA Requires Caltrans to Study a Reasonable Range of Alternatives in the EIR</u>.

Because an EIR is required, Caltrans must also analyze a range of feasible, reasonable alternatives that could avoid or substantially lessen the GCIP's significant environmental effects. (Cal. Pub. Res. Code § 21002; CEQA Guidelines § 15126.6). The MND analyzes only two alternatives: the Build Alternative (MND § 1.3.1.1) and the No-Build Alternative (MND § 1.3.1.2). These two alternatives do not constitute a reasonable range of alternatives as required by CEQA. It is irrelevant that Caltrans and TAM studied various improvement options in order to select the Build Alternative. Caltrans is required to analyze a range of project alternatives *in the EIR*. We concur with the Corte Madera Letter's

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[1] See www.ceqanet.ca.gov/DocDescription.asp?DocPK=636053 (last visited February 13, 2013).
[2] See www.tam.ca.gov/Modules/ShowDocument.aspx?documentid=2366 (last visited February 13, 2013). Informational materials for the September 29, 2009 meeting indicated that the environmental review process would include preparation of an EA/EIR. See www.tam.ca.gov/Modules/ShowDocument.aspx?documentid=2456 (last visited February 13, 2013).
[3] See www.tam.ca.gov/Modules/ShowDocument.aspx?documentid=2917 and www.tam.ca.gov/Modules/ShowDocument.aspx?documentid=2919 (last visited February 13, 2013).

comment that the failure to disclose or analyze the type of collisions justifying construction of the proposed southbound Wornum Drive off-ramp calls into question the issue of the purpose of the proposed project and whether an alternative thereto could equally serve the stated project objectives.

3. The MND Does Not Adequately Analyze Traffic, Pedestrian, and Bicycle Impacts on the Project.

We concur with the Corte Madera Letter's comment that there are several potentially adverse impacts of the GCIP that have not been analyzed in the MND, including circulation impacts to properties located along Nellen Avenue and bicycle and pedestrian facilities. We note that our Project includes an access point via a driveway on Nellen Avenue. The MND does not analyze circulation impacts on our Project or related traffic impacts to nearby streets and intersections that could occur due to closure of Nellen Avenue. The transportation analysis should be revised to include this analysis, and to identify mitigation measures that reduce any adverse circulation and traffic impacts that could result from closure of Nellen Avenue.

Furthermore, we are concerned about the impacts of removal of the Nellen Avenue pedestrian/bicycle overcrossing for the reasons noted in the Corte Madera Letter. We concur with the Corte Madera Letter's comment that re-routing of existing pedestrian and bicycle facilities which results in a more than one-half mile detour and which cuts off direct access between neighborhoods will adversely impact the connectivity and pedestrian network in the area. These adverse impacts must be analyzed and appropriate design revisions or mitigation measures must be incorporated into the GCIP and included in the EIR.

4. The MND Noise Analysis is Inadequate under CEQA.

The MND improperly excludes analysis of noise impacts on our Project, and contains other significant gaps in information and analysis that must be addressed.

A. The Project is Not Speculative and Must Be Analyzed under CEQA.

The MND incorrectly states that no building permits have been issued for our Project, and concludes that "evaluating the potential project-related noise impacts on the WinCup development would be speculative at this time." (MND, pp. 2.3-50 & 51). This conclusion is factually incorrect. Our Project received demolition permits in December 2012 and construction building permits in February 2013.

In addition, and more importantly, under CEQA, the issuance of building permits is not the applicable standard for determining whether impacts must be analyzed. Courts have declined to require speculative impacts analysis under CEQA where the environmental consequences of a plan or project were unspecified and uncertain. However, environmental analysis under CEQA is *not* premature where a future use is clear and is therefore reasonably foreseeable. The future use of the Project site has been clear for several years. Specifically, our Project was originally contemplated in the Corte Madera General Plan adopted in April 2009. Our site was then identified as a high-priority housing site in the Town's updated Housing Element, adopted in April 2011. Our Project has received all discretionary approvals from the Town of Corte Madera, including re-zoning of the site into the Mixed-Use Gateway

District in April 2011, and design review approval in February 2012. We have been proceeding diligently toward construction and completion of our project. We received demolition permits in December 2012, the former WinCup buildings on our site have been demolished, and the site is being prepared for construction. Construction building permits were issued in February 2013, and we anticipate beginning construction later this month. Therefore, under CEQA, Caltrans cannot avoid analyzing noise impacts on our Project by claiming that evaluation of GCIP noise impacts is speculative.

Moreover, as part of our design review process, we retained an acoustics consultant to analyze the noise impacts of our Project under both existing and cumulative conditions, and to identify preliminary measures to reduce interior and exterior noise levels to meet state and local requirements. The findings of this analysis are documented in the Environmental Evaluation considered by the Town of Corte Madera prior to granting our design review approval in February 2012 (EE)[4] and in the noise report attached thereto as Appendix B. We have incorporated our consultant's recommended measures into our project design. Similarly, Caltrans must now analyze the noise impacts of the GCIP under both existing and cumulative conditions, including impacts on our Project, and must incorporate design features and/or mitigation measures to reduce noise impacts.

B. The MND Noise Analysis is Inadequate.

The MND noise analysis is based on the Caltrans Noise Study Report dated June 2011 (with October 2012 addendum)(NSR). Our acoustical consultant, Charles M. Salter Associates Inc., reviewed the MND and NSR to determine the sufficiency of the noise analysis, with a focus on whether noise impacts on our Project are adequately addressed. The findings of this review are reported in a letter report dated February 14, 2013 (Salter Report)(See Attachment A).

For the reasons stated in the Salter Report, Caltrans must further analyze noise impacts, and consider the potential mitigation measures that could reduce these impacts and should re-circulate the analysis for public review and comment as part of the EIR.

5. The MND Visual/Aesthetics Section is Fundamentally Flawed.

The MND visual/aesthetics section is fundamentally flawed, as discussed below. (We also note that the MND is internally inconsistent because it omits analysis of noise impacts on our Project, but includes analysis of visual and aesthetics impacts on our Project.)

A. The MND Visual/Aesthetics Incorrectly Describes the Project.

Most notably, the MND incorrectly describes the Project for purposes of aesthetics impacts analysis. The MND states: "The height of these buildings is estimated to be between 35 and 55 feet tall. The first and second floors of the development will be for commercial and parking level uses; there are no

[4] The EE was prepared in order to determine whether the program EIR adopted for the 2009 Town of Corte Madera General Plan, including the project-level analysis of Alternative 3 - Gateway Development Alternative in Section 6.5 of the draft General Plan EIR, covers the environmental effects of the Project. The EE concluded that the 2009 General Plan program EIR adequately assesses the environmental effects of the Project. (EE, pp. 1- 2). A copy of the EE is on file with the Town of Corte Madera.

residential uses in the first and second floors. Residential apartment units will be located on the third, fourth, and fifth floors." (MND, p. 2.2-67). This description is inaccurate in three specific ways.

First, the Project will include residential uses on all floors. The MND incorrectly states that there are no residential uses in the first and second floors. Accordingly, the MND fails to analyze aesthetics impacts for residential uses on the first and second floors, which will be most impacted by the construction of the southbound Wornum Drive off-ramp adjacent to the Project Site.

Second, the Project will include buildings with one to four stories, but none of the buildings will include a fifth floor. The MND incorrectly states that residential apartment units will be located on fifth floors. The MND asserts that "all of the views from the fourth and fifth level will be preserved" with the construction of the GCIP, and concludes that there will be little to no change in the visual quality of residents' views toward the Shorebird Marsh/Corte Madera Ecological Reserve and San Francisco Bay to the east. The MND's conclusion that the GCIP is not anticipated to degrade the quality of the visual resources available to the viewers from the Project is based on an erroneous assumption.

Third, the Project is located within the Town of Corte Madera's MUGD Zoning District, which allows a maximum building height of 38 feet along street frontages and 48 feet on inner portions of the lot.[5] The MND incorrectly states that the height of buildings is estimated to be between 35 and 55 feet tall. Because zoning requirements impose a height limitation of 38 or 48 feet, no building within the Project could exceed 48 feet in height. The incorrect assumption regarding building height underestimates the potentially significant aesthetics impacts of the GCIP on residents of our Project.

Because the MND included major errors in its description of the Project, resulting in incorrect assumptions about the location and height of residential uses in the Project that would be impacted by the GCIP, Caltrans cannot rely on the MND's incorrect analysis to support a conclusion that the GCIP would not result in significant aesthetics impacts. The aesthetics analysis must be corrected and re-circulated for public review and comment as part of the EIR.

B. The MND Fails to Acknowledge the Project's Aesthetic Benefits and Underestimates the GCIP's Visual/Aesthetics Impacts.

The MND describes the existing overall visual quality in the vicinity of our Project site as "moderate/average" (Table 2.2-24) and incorrectly states that "[i]n the future, minor changes to the Lucky and Fifer District visual environment will occur with the construction of the 195-205 Tamal Vista residences project." (MND, p. 2.2-67). In fact, our Project will greatly enhance the visual environment of the surrounding area, as recognized in the EE. The EE expressly recognized that our Project would positively contribute to the Town's architecture and have a positive aesthetic impact, as illustrated in the photosimulations attached hereto as Attachment B (attached to EE as Exhibit D). For example, our Project incorporates site planning and architecture techniques intended to reduce the perception of visible bulk and building mass. The Project preserves mature trees along Tamal Vista Boulevard and Wornum Drive, effectively buffering the proposed buildings along these frontages. Proposed new perimeter landscaping softens the Project's edges and provides an aesthetic benefit to our Project site and

[5] See Corte Madera Zoning Code § 18.18.1040 (Mixed-Use Gateway Overlay District Development Standards).

surrounding areas. Our Project site provides views of Mount Tamalpais, and buildings are situated to optimize those views while maintaining view corridors through and into the site for visual connectivity from the outside. The Project incorporates several focal points, and the signature building at the corner of Tamal Vista Boulevard and Wornum Drive is designed to provide a gateway to the larger community. (EE, p. 16). Together, these aspects of the Project provide a clear aesthetic benefit compared to the single-story, tilt-up industrial buildings and limited perimeter landscaping that they are replacing.

By failing to recognize that construction of our Project will provide aesthetic benefits, the MND underestimates the severity of visual/aesthetics impacts that will result from construction of the Wornum drive off-ramp immediately adjacent to our Project. Therefore, the aesthetics impacts of the GCIP could potentially be more severe than analyzed in the MND. We concur with similar comments on MND Section 2.2.6 submitted by Jackovics Enterprises Inc., dated February 12, 2013. The aesthetics analysis must be revised to incorporate correct assumptions about the existing visual quality baseline and visual changes that will result from construction of our Project and it must be recirculated for public review and comment as part of the EIR.

C. The MND Does Not Include Detail Sufficient to Assess Aesthetic/Visual Impacts of the Proposed GCIP Design.

The MND concludes that the GCIP is not anticipated to degrade the quality of visual resources available to viewers from our Project. (MND, p. 2.2-67). However, this conclusion is unsupported because the MND does not include detail regarding the design of the proposed GCIP and Wornum off-ramp that is sufficient to evaluate aesthetics impacts on our Project or other viewer groups in our area. For example, MND Figure 1-2 illustrates the proposed GCIP improvements using a figure expressly acknowledged as "not to scale". (MND, pp. 1-14 & 1-15). In a letter to the Town of Corte Madera and City of Larkspur Councilmembers dated February 1, 2013, TAM provided additional information regarding view blockage and aesthetic characteristics contained in the MND. TAM's letter includes Figure 5, depicting the height of existing streets and freeways, proposed GCIP improvements, and our Project. However, Figure 5 does not provide any context for analysis of visual impacts associated with the construction of GCIP improvements. For example, the MND states that the proposed southbound Wornum off-ramp will be elevated approximately five feet above US 101, but will quickly drop in elevation approaching the intersection with Wornum Drive. (MND, p. 2.2-67). Figure 5 shows the SB Wornum Off-ramp with an elevation of 42 feet, but it is not clear whether this elevation is before or after the off-ramp drops in elevation near Wornum Drive.

Without more specific information about the proposed Wornum off-ramp design, the MND lacks the basic, essential information necessary to assess visual and aesthetic impacts to residential uses at various locations and heights within our Project and the surrounding area. As such, there is insufficient evidence to support the MND conclusion that the GCIP is not anticipated to degrade the quality of the visual resources available to viewers from our Project. Caltrans must supplement the GCIP project description in the EIR.

Conclusion

For the reasons outlined above, Caltrans must undertake further analysis of the issues noted above, and prepare an EIR that adequately analyzes potentially significant impacts of the GCIP, identifies mitigation measures to reduce those impacts, and considers a reasonable range of project alternatives.

Sincerely,

Tamsen Plume
Holland & Knight, LLP
Attorneys for 195-205 Tamal Vista Boulevard LLC

cc: Dianne Steinhauser, Executive Director, TAM
Alice Fredericks, Chair, and TAM Board of Commissioners
Diane Furst, Mayor, Town of Corte Madera, and Town Council
Dan Hillmer, Mayor, City of Larkspur, and City Council
David Bracken, Town Manager, Town of Corte Madera
Dan Bell, Planning Director, Town of Corte Madera
Veronica Nebb, Town Attorney, Town of Corte Madera
Bill Whitney, Principal Project Manager, TAM

Attachments

A. Charles M. Salter Associates Inc. Highway 101 Greenbrae/Twin Cities Corridor (GTCC) Project - Acoustical Analysis of Impacts on 195-205 Tamal Vista Boulevard, dated February 14, 2013.

B. 195-205 Tamal Vista Boulevard Design Review Before and After Photosimulation.

<u>Attachment A</u>

Charles M. Salter Associates Inc.
Highway 101 Greenbrae/Twin Cities Corridor (GTCC) Project
Acoustical Analysis of Impacts on 195-205 Tamal Vista Boulevard
February 14, 2013

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14 February 2013

195-205 Tamal Vista Boulevard LLC
c/o MacFarlane Partners
Attn: Britt Wenzler
201 Spear Street, 14th Floor
San Francisco, CA 94105

Subject: **Highway 101 Greenbrae/Twin Cities Corridor (GTCC) Project – Acoustical Analysis of Impacts on 195-205 Tamal Vista Boulevard**
CSA Project: 13-0058

Dear Britt:

As requested, we reviewed public documents related to the GTCC project. The purpose of our review was to determine the sufficiency of the noise analysis included in environmental documents, with a focus on whether noise impacts on the 195-205 Tamal Vista Boulevard project are adequately addressed.

EXECUTIVE SUMMARY

- TAM's noise study only performed four non-concurrent short-term and one long-term acoustical measurement for the entire corridor under study. No measurements were conducted at the site of 195-205 Tamal Vista Boulevard. We question the adequacy of this measurement program to fully capture the character of the noise environment, particularly on the west side of Highway 101 at Wornum Drive
- The Transportation Authority of Marin (TAM) noise study report (NSR) did not study the site of 195-205 Tamal Vista Boulevard (formerly the WinCup factory)
- The TAM NSR did not evaluate effects from maximum noise levels that would occur when trucks or other vehicles decelerate (e.g., downshifting, air brakes) while taking the southbound Wornum Drive off-ramp
- TAM should study noise impacts on the 195-205 Tamal Vista Boulevard residences related to traffic noise, including traffic and vehicle deceleration on the Wornum Drive off-ramp, and should evaluate any mitigation measures would reduce those impacts
- Noise from certain potential highway construction activities at the nearby future residences at 195-205 Tamal Vista Boulevard are predicted to be significantly louder than local traffic noise levels; TAM should analyze whether any mitigation measures would reduce those impacts
- Further analysis and consideration of mitigation measures should be undertaken as outlined in our Recommendations

PROPOSED GTCC PROJECT

The Transportation Authority of Marin (TAM) proposes to renovate several segments of Highway 101 between Corte Madera Creek on the north and Tamalpais Drive on the south. The segment of the project that could potentially affect the 195-205 Tamal Vista Boulevard multifamily residential/mixed-use project is the proposed new off-ramp from southbound Highway 101 onto Wornum Drive. This arterial roadway comprises the southern property line of 195-205 Tamal Vista Boulevard. The exit ramp would cross over Nellen Avenue, located between 195-205 Tamal Vista Boulevard and Highway 101. Portions of the ramp would be elevated above Highway 101 and Nellen Avenue, and be near the

elevation of the 195-205 Tamal Vista Boulevard project[1]. The new exit would be used by approximately 740 cars per hour during peak times in the morning[2].

REVIEW OF PROJECT DOCUMENTS

We reviewed the following GTCC documents:

- Noise Study Report (NSR) Document dated June 2011 (04-MRN-101-7.2/8.9)
- Letter to Town of Corte Madera and City of Larkspur from TAM dated 1 February 2013 regarding visual impacts
- Excerpts from the TAM Environmental Document regarding visual impacts and scenic resources
- Charles M. Salter Associates EIR review letter for Town of Corte Madera General Plan dated 3 November 2011
- Charles M. Salter Associates environmental noise study for 195-205 Tamal Vista Boulevard dated 3 November 2011

ANALYSIS OF PROPOSED GTCC PROJECT NOISE

1. 2011 On-Site Acoustical Measurements

Charles M. Salter Associates conducted acoustical measurements at the 195-205 Tamal Vista Boulevard in September 2011. The measurements quantified site noise levels. This data was used to determine design features, such as window STC[3] ratings, necessary to meet State Code and Town General Plan requirements for interior and exterior noise.

The day-night average (DNL[4]) noise level at the site facing Highway 101 at the 195-205 Tamal Vista Boulevard project setback was DNL 73 dB. 1 dB was added to the measured level to account for future traffic growth (for a total of DNL 74 dB), consistent with the Town of Corte Madera's General Plan.

2. Review of GTCC Project Traffic Noise Measurements

TAM's Noise Study Report (NSR) summarized acoustical measurements conducted at five locations between Corte Madera Creek and Tamalpais Drive in 2009 and 2010. Four measurements in 2009 were non-concurrent and short-term (1 hour or less). There was also one 24-hour measurement conducted in 2010 to determine overall traffic patterns. Locations were selected by TAM to be near sensitive receivers. The NSR noted 120 sensitive receiving properties, designated R1 to R120 from north to south.

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[1] Letter from TAM to City of Larkspur and Town of Corte Madera, dated 1 February 2013.

[2] Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Noise Study Report, June 2011 (amended October 2012), Page 47.

[3] Sound Transmission Class (STC) — A single-figure rating standardized by ASTM and used to rate the sound insulation properties of building partitions. The STC rating is derived from laboratory measurements of a particular building element and as such is representative of the maximum sound insulation.

[4] Day-Night Average Sound Level (DNL) – A descriptor established by the U.S. Environmental Protection Agency to describe the average day-night level with a penalty applied to noise occurring during the nighttime hours (10 pm - 7 am) to account for the increased sensitivity of people during sleeping hours.

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No measurements were conducted at the site of 195-205 Tamal Vista Boulevard. Based on the number, timing, and locations of the short-term and long-term measurements, we question the adequacy of the noise measurement program as it relates to the number of potential receivers.

Although it is true that acoustical measurements do not need to be conducted at all 120 sensitive receivers to accurately predict noise potential impacts, nonetheless there was a large gap in the measurement locations on the west side of Highway 101 which included the 195-205 Tamal Vista Boulevard site. If 195-205 Tamal Vista Boulevard had been included as a sensitive receiver, the site would be one of the largest (if not the largest) within the studied corridor.

Additionally, Table 2.3-12 in the TAM Environmental Document suggests that existing and no-build alternative (2035) noise levels are predicted to be equal. However, NSR Appendix A (Traffic Data) includes tables showing AM and PM peak hour traffic volumes for mainline freeway segments and ramps, and it appears that in many cases, there is a difference between existing and no-build alternative traffic volumes. The NSR and TAM Environmental Document do not explain why it is assumed that existing and no-build alternative noise levels are predicted to be equal even where traffic volumes are different.

TAM Measured Traffic Noise Data

TAM's Location M2 (page 25 of the NSR) is shown to be the closest to the site of 195-205 Tamal Vista Boulevard, albeit on the other side of the freeway (northbound). TAM's Location M3 is south of the project site on the west side of the highway.

Short-term measured data showed that the hourly Leq noise level during afternoon commute (assumed to be peak hour) at location M2 was 73 dBA[5]. Our acoustical measurement data from 2011 showed similar peak hourly Leq[6] levels at the 195-205 Tamal Vista Boulevard setback along Highway 101 and Nellen Avenue. Measured levels are higher than the NSR's Noise Abatement Criteria (NAC) from Caltrans, described in NSR Chapter 4. The NSR applies Caltrans' "Category B" criterion of 67 dBA hourly Leq at residential exterior spaces due to project noise.

3. Analysis of GTCC Wornum Drive SB Off-Ramp Noise Impacts

Traffic Noise from Southbound Wornum Drive Off-Ramp

Analysis of traffic noise impacts on the 195-205 Tamal Vista Boulevard residences associated with the proposed Wornum Drive SB Off-Ramp were not included in the NSR. According to the NSR, the new off-ramp would be used by approximately 740 cars per hour during peak AM times.

[5] dBA – A-Weighted sound pressure level (or noise level) represents the noisiness or loudness of a sound by weighting the amplitudes of various acoustical frequencies to correspond more closely with human hearing. A 10-dB (decibel) increase in noise level is perceived to be a doubling of loudness. A-Weighting is specified by the U.S. EPA, OSHA, Caltrans, and others for use in noise measurements.

[6] L_{eq}--The equivalent steady-state A-weighted sound level that, in a stated period of time, would contain the same acoustic energy as the time-varying sound level during the same period.

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Vehicle Deceleration from Southbound Wornum Drive Off-Ramp

Analysis of maximum noise from decelerating vehicles on the exit ramps was not included in the NSR. There would be noise emissions from downshifting traffic decelerating on the southbound off-ramp as it slopes downwards to meet Wornum Drive. Maximum impulsive noise levels from truck air brakes, downshifting, or other deceleration phenomena are 10 dBA (or more) louder than typical vehicle noise[7]. Under most circumstances vehicle noise decreases as the vehicles' speed decreases. These potential effects on nearby receivers (e.g., the potential for sleep disturbance in nearby residences) were not studied by the NSR.

4. GTCC Construction Noise Analysis

Chapter 8 (page 42) of the NSR provided an overview of potential project construction equipment, with associated noise levels at 50' from the source (in dBA). Levels range from 55 dBA for a pickup truck to 95 dBA for pile driving.

The Study states that the proposed southbound Wornum off-ramp construction will comply with applicable local, state, and Federal regulations for construction hours and noise control. The Town of Corte Madera's construction noise requirements stipulate limited hours of operation for construction, between 7:00am and 5:00pm on weekdays and 10:00am to 5:00pm on the weekends. There is no Town quantitative requirement for construction noise or equipment.

The Study also includes requirements for Caltrans' contractor to implement "appropriate" noise control measures, including local barriers, special locations for stationary equipment, turning off idling equipment, scheduling activities for daytime hours, and notification of nearby residents.

The closest setback of 195-205 Tamal Vista Boulevard residences project site is approximately 150' west of the centerline of the proposed off-ramp. This would be perceived as a halving of loudness. However, depending on the type and location of construction activity, levels from the louder equipment (e.g., pile driving) would be up to 85 dBA at the nearest receiver. Given the proximity of the 195-205 Tamal Vista Boulevard site to construction activities associated with the proposed Wornum Drive off-ramp, we recommend that TAM further analyze construction noise impacts on the residences, and that additional mitigation measures that could reduce those impacts be considered by TAM.

RECOMMENDATIONS

1. The TAM NSR should be amended to include additional noise measurement data for the segment of Highway 101 adjacent to 195-205 Tamal Vista Boulevard. Because the hourly noise level is higher than the Caltrans Category B criterion, we would recommend that TAM undertake further analysis to determine whether this impact is significant under CEQA, and that mitigation measures to reduce those impacts be considered.

2. The TAM NSR should be amended to include predicted noise impacts from the southbound Wornum Drive exit, including traffic and vehicle deceleration noise impacts. Assessments should be made as to the feasibility of a noise barrier along the exit facing west or other means to reduce noise emissions from decelerating vehicles coming down from the ramp as they approach Wornum

[7] Chapter 3 of the NSR describes human response to change in noise levels. A 10-dB change in noise would be considered to be twice as loud.

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Charles M. Salter
ASSOCIATES INC.

Drive, in addition to other mitigation measures that would reduce these noise impacts. We recommend that TAM undertake further analysis to identify these noise impacts, and that TAM consider mitigation measures that could reduce those impacts.

3. The TAM NSR and Environmental Document should be revised to include an explanation of why it is assumed that the "existing" and "2035 no build alternative" noise conditions are predicted to be equal throughout the study area, in light of the differences in AM and PM peak hour traffic volumes on mainline freeway segments and ramps for existing and no-build alternative scenarios[8].

4. Because the hourly noise level is higher than the Caltrans Category B criterion stated in the NSR, we recommend that TAM undertake further analysis to determine whether traffic noise impacts are significant under CEQA, and that TAM consider mitigation measures that could reduce those impacts.

5. Because the 195-205 Tamal Vista Boulevard project site would be immediately adjacent to the Wornum Drive off-ramp construction site, TAM should further analyze construction noise impacts on these residences and consider any additional mitigation measures that could reduce such impacts. The authority having jurisdiction should implement a construction noise monitoring program for the Wornum Drive off-ramp and potentially other segments to be built near residences. Noise monitoring is often used to log construction activity noise and compare it to local ambient conditions or other criteria as adopted by a jurisdiction. Events that exceed criteria are identified by the monitoring equipment and the contractor is notified of the exceedances.

6. Caltrans should investigate the efficacy of "quiet" pavement technologies for the SB Wornum Drive off-ramp. Such pavements have been shown in studies around the world to be capable of reducing tire-road noise by 3 dBA or more, which is considered to be a "significant" change in roadway noise. Caltrans' May 2011 Traffic Noise Analysis Protocol[9] states that they are actively evaluating quiet pavement technologies.

7. Based on the outcome of the further analysis recommended in this report, TAM should determine whether any other mitigation measures would reduce noise impacts associated with construction and operation of the GTCC.

* * *

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[8] Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Noise Study Report, June 2011 (amended October 2012), Page 47.

[9] http://www.dot.ca.gov/hq/env/noise/pub/ca_tnap_may2011.pdf.

This concludes our current comments on the subject project. Please call with any questions.

Sincerely,

CHARLES M. SALTER ASSOCIATES

Ethan Salter, PE, LEED AP
Principal Consultant

cc: Paula Kirlin
Holland & Knight
Email: paula.kirlin@hklaw.com

ES/CMS/es
2013_02_14 Hwy 101 GTCC Project Acoustical Noise Review Letter

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<u>Attachment B</u>

195-205 Tamal Vista Boulevard Design Review
Before and After Photosimulation

VIEW FROM WORNUM DRIVE:
BEFORE

195-201 Tamal Vista

Corte Madera, CA

MAJOR DESIGN REVIEW

2010-101
August 31, 2011

MacFARLANE PARTNERS | KGM | ROSS LUTHIN | BKF | THE GUZZARDO PARTNERSHIP INC. | TCA tca-arch.com

VIEW FROM WORNUM DRIVE:
AFTER

195-201 Tamal Vista

Corte Madera, CA

MAJOR DESIGN REVIEW

2010-101
August 31, 2011

MacFARLANE PARTNERS | KGM | ROSS LUTHIN | BKF | THE GUZZARDO PARTNERSHIP INC. | TCA tca-arch.com

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Josh Kalkhorst
The Village at
Corte Madera

Andrew Katzenson
California Pizza
Kitchen

Richard "Doc" Klussman

Dr. Greg Orcutt
Orcutt Chiropractic

Keith Passaretti
PC Consulting

Julie Kritzberger
Executive Director

February 12, 2013

Caltrans District 4
Attention: Valerie Shearer
Senior Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660
Email: valerie-shearer@dot.ca.gov

Dear Ms. Shearer,

The Corte Madera Chamber would like to take this opportunity to comment on the Hwy 101 Greenbrae/Twin Cities Corridor Improvements Draft Environmental Documental. We believe this project has not been designed in a context sensitive manner and is not in the best interests of the business community or residents of the Town of Corte Madera. It will have negative impacts on residents, schools, local traffic circulation and businesses. The flyovers and walls will create visual intrusions of the existing scenic landscape and is not appropriate in the context of the Highway 101 in the Twin Cities, and is not necessary to solve any of the problems which this project is supposed to address.

The Corte Madera Chamber strongly suggests that a full Environmental Impact Report be done which is required by law. The Draft Environmental Document is inadequate due to some of the following reasons:

a. The project does not increase traffic capacity on Hwy 101
b. Traffic congestion will still exist on east and west Sir Francis Drake Blvd.
c. There is no analysis of noise impacts on adjacent communities
d. There is no analysis of visual impacts on adjacent communities
e. There is no analysis on impacts to the business community during construction
f. There is no analysis of parking impacts where parking is being eliminated
g. There is no analysis of future growth in the adjacent area

We ask Cal Trans and TAM to change this project. The majority of citizens in Corte Madera and Larkspur are opposed to this project and has come to many public meetings to voice their comments. The "No Build" alternative has fewer adverse impacts than the "Build" project. We ask that you consider a less massive, less expensive, and less drastic alternative be considered. We thank you for your consideration.

Respectfully,

Julie Kritzberger
Executive Director

129 Corte Madera Town Center, Corte Madera, CA 94925
PHONE: 415-924-0441 Fax: 415-924-1839
Julie Kritzberger, Director

Tricia Lacy
45 Ash Avenue
Corte Madera, CA 94925
TriciaLacy@gmail.com

Send to:
Caltrans District 4
Attention: Valerie Shearer
Senior Environmental Planner
Office of Environmental Analysis, MS-88
P.O. Box 23660
Oakland, CA 94623-0660

Email: Valerie_shearer@dot.ca.gov

Dear Ms. Shearer:

Please acknowledge receipt of this comment letter to confirm that it is included in the public comment process. These comments apply to the Highway 101 Greenbrae/Twin Cities Corridor Improvements Draft Environmental Document.

The project will result in the following significant environmental impacts, which cannot be mitigated. The Negative Declaration is not appropriate. A full Environmental Impact Report (EIR) is required by law and must be done.

1. **Flyovers and 7 proposed soundwalls will create substantial massive visual intrusions** on the existing scenic townscape, including but not limited to Corte Madera, Larkspur, and Greenbrae. The massive concrete structures will become a dominant landscape feature when looking down from the top of Mount Tamalpais, Marin's premier view spot, as the project area sits directly below East Peak.

2. **Flyovers will create significant noise that will be detrimental to residents of the area**, including residents of the Greenbrae Marina and Boardwalk, the Golden Gate and Marin Travel Trailer Parks, residents in hill areas of unincorporated Greenbrae above Sir Francis Drake Blvd., Madera Village Suites and the Best Western Hotel. Seven proposed sound barriers will do little to dampen noise, and will instead amplify and funnel noise into nearby and surrounding hillside neighborhoods.

3. **Local traffic will continue to be adversely impacted, in particular during several years of construction**, which will limit local mobility, especially on northbound Tamal Vista between Wornum and Fifer, and as drivers seek alternative routes and spill over onto local streets. Traffic already backs up Northbound on Tamal Vista for several hours each day during the Holiday shopping season from November to January, and at other times.

4. **Bicycle and pedestrian routes will be more dangerous than the existing routes**, as the Wornum Interchange will require crossing busy new ramp lanes and up to four signalized intersections close together on Wornum Drive. ***This point is especially important to me as I have 3 young daughters.

5. Additional pavement will exacerbate existing flooding problems.

6. Relocation of bus stops will result in a path of travel that will be difficult for the disabled to use.

This project does not meet the stated goals of increased safety and reduced traffic congestion. The Draft Environmental Document is inadequate due to the following:

7. **The project does not increase traffic capacity on Highway 101, and only reduces commute time by 1 min/20sec in the Southbound 101 direction and from 6-8 minutes in the Northbound 101 direction by the year 2035.** This savings is hardly worth the $143 million price tag.

8. **The proposed project does not increase traffic capacity on East and Westbound Sir Francis Drake**, thus severe traffic congestion will continue to exist in both directions on this main thoroughfare.

9. **Vehicular safety improvement is not demonstrated and traffic collision data in the document is inaccurate** as it includes 150+ collisions with San Francisco addresses and 2 fatalities caused by medical conditions, not road conditions. The existing project area already has a below-average collision rate, as illustrated in Table 13 of the Traffic

Operations Report.

10. **This project does not adequately comply with "Complete Streets" concepts**, which require transportation projects to serve all users, including cyclists, pedestrians and transit users.

11. **There is no evidence that either Golden Gate Transit or Marin Transit will provide bus routes** to serve transit riders at the four new bus stops in the Greenbrae Interchange.

12. **There is inadequate analysis of parking impacts in areas where street-front parking is being eliminated**, and there is no parking or safe drop-area at several bus stops.

13. **There is inadequate analysis of impacts related to eliminating the existing Nellen Avenue**, which serves as the street frontage and access to several longtime businesses .

14. **There is inadequate analysis of visual impacts on the adjacent communities**

15. **There is inadequate analysis of noise impacts** on the adjacent communities.

16. **There is insufficient information about impacts to the community during the project construction** period, which will include numerous and prolonged detours as well as installation of 273 piles (90 ft. long) through 75+ feet of bay mud.

17. **There is insufficient analysis of impacts in or near Corte Madera Creek**, including impacts on sensitive habitat, wildlife, and water quality.

18. **There is inadequate analysis of population and traffic projections**, which are outdated and inconsistent, especially in regard to recent growth forecasts issued by the State Department of Finance.

19. There is inadequate analysis of future growth in the adjacent area.

20. **There is inadequate analysis of compliance with significant components of the Town of Corte Madera General Plan, the City of Larkspur General Plan and the Marin Countywide Plan.**

21. **There are not sufficient project alternatives for consideration** in the OED.

Cal Trans needs to change this project:

22. **Public opposition to the "Build" project is significant.**

23. The "No Build" alternative has fewer adverse impacts than the "Build" project.

24. Less massive, less expensive and less drastic **alternatives need to be considered**.

25. The **project does not address existing flooding** and future sea level rise.

26. **The proposed Wornum Interchange will create potentially dangerous conditions for pedestrians and bicyclists, many of them school-age children**, and disabled persons who use it to travel between the West and East side of the Twin Cities and surrounding areas.

27. Local traffic needs a safe left turn option out of the Trader Joe/Cost Plus Plaza.

28. **Congestion on East and West Sir Francis Drake Boulevard must be addressed**, particularly as three eastbound lanes leading to Highway 580 and the Richmond-San Rafael Bridge shrink down to one lane, which is what

causes the backup each weekday afternoon on Highway 101.

Sincerely,
Tricia K. Lacy

TAM TRANSPORTATION ALTERNATIVES FOR MARIN

February 14, 2013

Caltrans District 4
Attn: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

VIA E-MAIL: valerie_shearer.dot.ca.gov

RE: COMMENTS ON THE INITIAL STUDY/ENVIRONMENTAL ASSESSMENT (IS/EA) FOR THE HIGHWAY 101 GREENBRAE/TWIN CITIES CORRIDOR IMPROVEMENT PROJECT.

Dear Caltrans District 4:

These comments are provided by Transportation Alternatives for Marin ("TAM"). TAM is a 501(c)(3) non-profit corporation whose mission is to promote pedestrian and bicycle transportation. TAM's mission is advanced through working with the cities, the County, and the institutions of Marin County to make Marin a model community for pedestrian and bicycle transportation, and demonstrating that investment in integrated bicycle and pedestrian infrastructure, combined with education, can promote well being and build a healthy and happy community. TAM works closely with Marin County Bicycle Coalition ("MCBC"), although TAM's comments are submitted independently of the MCBC's comments.

Please find enclosed a copy of a document entitled: "Save the North South Greenway." This document recommends the North South Greenway be completed from the Cal Park Hill Tunnel to the Sandra Marker Trail on the preferred alignments already adopted by Larkspur, Corte Madera, the County, and the Bay Trail as part of the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project. The document "Save the North South Greenway" is included with the submission of this letter and all its contents should be taken into consideration as part of TAM's IS/EA comments.

The North South Greenway was originally envisioned in the 1974 County Bicycle Plan. The detailed alignment was first identified in the 1994 North South Bikeway Study conducted by the County. Since 1994 Sausalito, Mill Valley, Corte Madera, Larkspur, San Rafael, and Novato, as well as the County of Marin, have all included the North South Greenway in their respective Bicycle and Pedestrian Plans. In particular, both Corte Madera and Larkspur identify the North South Greenway as the primary bicycle pedestrian alignment through their cities, forming critical parts of the most important bicycle route in the County.

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In 2004, the City of Larkspur completed a study called the Central Marin Ferry Connection Project, which identified the preferred alignment of the North South Greenway from the north side of East of Sir Francis Drake Boulevard to Redwood Highway. The Central Marin Ferry Connection alignment follows the railroad right-of-way across East Sir Francis Drake Boulevard, across Corte Madera Creek, on the railroad right-of-way behind the Cost Plus Shopping Center, past the trailer park to Redwood Highway. Phase I of the Central Marin Ferry Connection, which will connect the Cal Park Hill Tunnel over East Sir Francis Drake Blvd to the north side of Corte Madera Creek, starts construction in 2013.

The most critical connection of the North South Greenway relative to the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project is at Wornum Drive. Originally Wornum Drive was the North Pacific Railroad right-of-way. In approximately 1995 Wornum Drive was built as a road in the railroad right-of-way. Highway 101 overpasses Wornum Drive because it was a railroad right-of-way when Highway 101 was built. The 1994 North South Bikeway Plan and the Larkspur and Corte Madera Pedestrian and Bicycle Plans identify the Wornum underpass as the passage from the east side of Highway 101 to the west side of Highway 101, connecting east Corte Madera and Larkspur to west Corte Madera and Larkspur. Wornum Drive is literally 50% in Larkspur (the east side) and 50% in Corte Madera (the west side). When the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project is built the North South Greenway, in particular the connection at Wornum Drive, should be considered the top priority for safe and separate pedestrian and bicycle accommodation from the east side of Redwood Highway to the Sandra Marker Trail.

Unfortunately the IS/EA does not refer to the Larkspur, Corte Madera, or County Pedestrian and Bicycle Plans, the Central Marin Ferry Connection Project Study, nor the North South Greenway alignment, or its importance as the key north south pedestrian and bicycle route in Marin County. Further, the IS/EA does not reference or include the Central Marin Ferry Connection Project in the project boundaries even though this is the premier automobile-alternative route in Marin, Corte Madera and Larkspur. This is a gross oversight in the IS/EA. While there are substantial pedestrian and bicycle improvements in the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project, the elimination of the North South Greenway is arbitrary and improper. The lack of reference, in particular to plans that have existed since 1974, must be corrected. All of the freeway improvements being done will have an impact on pedestrians and bicycles in the area. The local Larkspur and Corte Madera residents have testified in public and have passed resolutions stating that the undercrossing at Wornum Drive is a critical undercrossing and that the North South Greenway should be included in the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project.

TAM respectfully requests that the North South Greenway, from the north side of Corte Madera Creek to the Sandra Marker Trail, be included in the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project improvement area. Preliminary engineering has already been completed on the North South Greenway crossing of Corte Madera Creek from the south side of East Sir Francis Drake Boulevard parallel to the railroad right-of-way, connecting to the railroad right-of-way south of Corte Madera Creek staying on the railroad right-of-way all the way to Redwood Highway. This was done by the Transportation Authority of Marin. The materials in the attached document "Save the North South Greenway" show that the North South Greenway could complete a separate and safe pedestrian and bicycle passage from Redwood Highway to the Sandra Marker Trail.

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Also included in the attachment is information from San Rafael, California, Boulder, Colorado and the Netherlands, including engineering contact from Boulder, Colorado about road underpasses. The underpass of the North South Greenway on the top of Puerto Suello Hill in San Rafael is the best local example of infrastructure that could be used to connect the North South Greenway from Redwood Highway to the Sandra Marker Trail with no roadway crossings. (The Puerto Suello underpass turned the most dangerous North South Greenway undercrossing into the safest at an optimal expense. Bill Whitney from the Transportation Authority of Marin was involved in the Puerto Suello Hill underpass and understands the technical information and background of the underpass on the Puerto Suello Hill.) The Puerto Suello Hill underpass is longer than both of the underpasses at Redwood Highway or Tamal Vista, both identified in the attached materials as necessary to connect the North South Greenway from the Redwood Highway to the Sandra Marker Trail.

TAM strongly recommends that the environmental clearances be obtained, engineering be completed and the cost estimates for alternatives be developed to complete the North South Greenway from the south side of East Sir Francis Drake Boulevard (Phase I of the Central Marin Ferry Connection) to Redwood Highway (Phase II of the Central Marin Ferry Connection Project) and from there under Redwood Highway, under any proposed northbound 101 off-ramp at Wornum, back to grade level at Wornum Drive, under the 101 underpass and then under Tamal Vista Boulevard connecting to the Sandra Marker Trail. These improvements are the most sought after and beneficial community improvements in the entire Highway 101 Greenbrae/Twin Cities Corridor Improvement Project. These improvements would connect the communities of East Corte Madera with West Corte Madera, enabling school children to safely commute from East Corte Madera to Redwood High School, and further facilitate access from east Corte Madera to College of Marin. Additionally, grammar and middle school children who live in East Corte Madera or Larkspur could use this walking and cycling access to get to school safely.

Finally, the Bay Trail alignment also runs along the same passage of Phase II of the Central Marin Ferry Connection from the south side of East Sir Francis Drake Boulevard to approximately Redwood Highway. (The Bay Trail heads south slightly short of Redwood Highway and continues to east Corte Madera along the old railroad right-of-way.)

All of the recommendations for alignment have been included in Bicycle and Pedestrian Plans for almost 40 years. The IS/EA should contain these projects as preferred alternatives, environmental clearances should be obtained for the North South Greenway, preliminary engineering should be done, and these alternatives should be brought forth to the public as recommendations to complete the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project.

If you have any questions regarding these materials please do not hesitate to contact us.

Respectfully submitted,

Patrick M. Seidler

Patrick M. Seidler
President

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SAVE THE NORTH SOUTH GREENWAY

Connecting the Cal Park Hill Tunnel to the Sandra Marker Trail
Safely and Separately
As Part Of
The Highway 101 Greenbrae/Twin Cities Corridor Improvement Project

TAM
TRANSPORTATION ALTERNATIVES FOR MARIN

North South Greenway

- The single most important component of the Greenbrae/Twin Cities Corridor Improvement Project is to preserve and build the North South Greenway from the Cal Park Hill Tunnel to the Sandra Marker Trail.
- The most important North South Greenway crossing of Highway 101 in Marin County is from Redwood Highway to the Sandra Marker Trail under 101 alongside Wornum Drive.
- The greatest risk to a continuous routing of the North South Greenway in Marin County is at Wornum Drive.
- The most dangerous section of the North South Greenway for pedestrians and cyclists, after all improvements that are currently funded are built, is the section from Redwood Highway to Tamal Vista.
- The Solution to preserve the North South Greenway from Cal Park Hill Tunnel to Sandra Marker Trail is simple: Build safe and separate pedestrian and bicycle accommodation for this entire section and include this entire project in the Greenbrae/Twin Cities Corridor Improvement Project.

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The North South Greenway

A. Historical Background of the North South Greenway

The vision for Marin's North South Bicycle Route has existed since the 1970's, at which time most operations of the North West Pacific Railroad ("NWPRR") had ceased, and the County had acquired the southern portion of the NWPRR right-of-way and converted it to a multi-use path between Sausalito and Mill Valley. The initial concept was set out in Marin's first bicycle plan: "1974 Bicycle Plan for Marin," in which nine primary routes were designated in the seven page document. Route 1, the "Redwood Route," described a North South Bikeway that would be "the longest arterial bike route [in the County]" running the entire length of Marin from the Sonoma County border to the Golden Gate Bridge. While parts of the Bikeway were not on the old railroad rights-of-way alignments, the old railroad rights-of-way served as the primary location and nexus point for the Redwood Route.

In 1994 the Marin County Parks, Open Space and Cultural Services commissioned the Marin County North South Bikeway Feasibility Study with funding from a Federal Grant to determine an alignment of Marin's North South Bikeway. The 1994 North South Bikeway Study was the first comprehensive, detailed plan that identified a North South alignment, which primarily followed the abandoned railroad rights-of-way from Sausalito to Novato. The North Pacific Coast Railroad started in Sausalito, went through Mill Valley and Corte Madera, then from Larkspur through the Ross Valley to Fairfax, on to Woodacre and towards Point Reyes Station. After 1884 a spur was added where the North Pacific Railroad approaches Larkspur, which connected the North Pacific Coast Railroad tracks from Larkspur to the San Francisco and North Pacific rail line, built to connect the railroad from Tiburon through San Rafael to Petaluma. Today the Sandra Marker Trail is located on the connection section between the historic North Pacific Railroad and the San Francisco and North Pacific Railroad.

The North South alignment designated in the 1994 North South Bikeway Study followed the North Pacific Coast Railroad from Sausalito through the Alto Tunnel in Mill Valley/Corte Madera to Larkspur. The 1974 Marin County Bike Plan and the 1994 North South Bikeway Study both primarily followed the North Pacific Coast Railroad route from Larkspur to northern Novato. After the County of Marin accepted the results and recommendations of the 1994 North South Bikeway Study, the North South Bikeway became increasingly referenced in City Bicycle and Pedestrian Plans, including Plans from Sausalito, Corte Madera, Larkspur, San Rafael, Novato, the Marin Countywide Plan, and parts of the Bay Trail. Starting approximately 2000, Marin's City and County Plans, articles and reference materials began referring to the North South Bikeway alignment as the "North South Greenway."

B. Recent Developments in the North South Greenway and Short Term Plans

Sausalito received funding through the Non-motorized Transportation Pilot Program ("NTPP") and completed plans to extend the North South Greenway from the Sausalito Ferry Terminal to Gate 6 Road, where it meets the Sausalito – Mill Valley Bike Path, the southernmost currently built portion of the North South Greenway. NTPP funding is financing the Alto Tunnel study regarding engineering and land ownership issues to determine the practicality of opening the Alto Tunnel. The North South Greenway, if it ever goes through Alto Tunnel, would emerge on the Corte Madera side near Grove Avenue, where the Greenway heads north across Tamalpais Avenue, continuing behind LCM School and towards downtown Larkspur. The City of Larkspur repaved the railroad right-of-way to build the Sandra Marker Trail from Tamalpais Avenue to the edge of Tamal Vista Avenue in Corte Madera. There is a bike path on Wornum Drive that goes under Highway 101. The 1994 North South Greenway identified a route parallel to the railroad right-of-way behind Cost Plus, the trailer park and then over the Corte Madera Creek. After crossing the Corte Madera Creek, the North South Greenway would connect to the Sir Francis Drake overcrossing, which starts construction in 2013, through the now reopened Cal Park Hill Tunnel, which connects to Andersen Drive.

Sonoma Marin Area Rail Transit ("SMART") was passed for funding in 2008. SMART is currently considering alignment alternatives that locate the North South Greenway parallel to the SMART railroad tracks from Anderson Drive to Second Street in San Rafael. In 2013, the City of San Rafael will build improved bicycle access in the heavily populated and dense commercialized area from Second Street to Mission Street, connecting to the Puerto Suello Path. The Puerto Suello Path, located on the west side of 101 from Mission all the way to the top of Puerto Suello Hill, was completed in 2010 as part of the Highway 101 HOV Gap Closure Project. SMART is now designing and will build most of the remainder of the North South Greenway from the top of Puerto Suello Hill to Novato's northern City limits. As well, SMART has provisions for planning and building the North South Greenway from the Petaluma River all the way to Cloverdale. When completed, the entire length of the North South Greenway from the Golden Gate Bridge to Cloverdale would be approximately 91 miles and would create a path parallel to Highway 101 with minimal roadway interruption.

C. The Highway 101 Greenbrae/Twin Cities Corridor Improvement Project must mitigate the impacts to the North South Greenway

The alternatives being studied by the Transportation Authority of Marin, in particular the northbound off-ramps being added at Wornum Drive, the increased traffic on Redwood Highway and the increased traffic through Wornum Drive, the Greenbrae/Twin Cities Corridor Improvement Project has the responsibility to mitigate the increased traffic that will break up CRITICAL SECTIONS of the North South Greenway, primarily from Corte Madera Creek to the Sandra Marker Trail. THIS IS THE ALIGNMENT OF THE NORTH SOUTH GREENWAY, AS WELL AS PORTIONS OF THE BAY

TRAIL. (Note: Wornum Underpass was the original train route and Hwy 101 was built to overpass the railroad.)

D. Sections of the North South Greenway that are relevant to the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project
[See Exhibits on the following pages]

1. The Central Marin Ferry Connection Project [Exhibit D-1(A) and D-1(B)]
2. Redwood Highway to Sandra Marker Trail [Exhibit D-2(A) and D-2(B)]

The sections of the North South Greenway that are pertinent to the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project are, for the most part, contained in the Central Marin Ferry Connection Project. Additionally, the most important Highway 101 crossing for the North South Greenway is connecting the south end of the Central Marin Ferry Connection Project to the Wornum Avenue Path and then connecting to the Sandra Marker Trail at Tamal Vista Blvd.

1. Central Marin Ferry Connector Project

This Larkspur and Bay Trail co-funded Study carried forward one of the top priority North-South Bikeway projects from the 2001 County Bicycle Plan, a proposal to connect the communities of Corte Madera and Larkspur over Corte Madera Creek, which would complete a key segment of the Bay Trail and provide improved bicycle and pedestrian access to the Larkspur Ferry Terminal. The Central Marin Ferry Connection project was identified to plan a connection through or around the U.S. 101 Interchange, and across Sir Francis Drake Boulevard. The project site is notorious as the most heavily congested location in Marin County. It is the confluence of all multimodal routes, including pedestrian and bicycle paths, bus connector services, automobile, truck, ferry and airport commuter transportation services, all of which radiate across the Bay Area, extending the reach of non-motorized travelers. In 2002, the City of Larkspur began planning work on the Central Marin Ferry Connection project in partnership with local and regional agencies. Competitive source funding was obtained for design and environmental work. The report established a preferred alignment for the Central Marin Ferry Connection project that essentially follows the old Northwestern Pacific Railroad right-of-way between Wornum Drive in Corte Madera, across Corte Madera Creek, and across East Sir Francis Drake Boulevard on a new high-level bridge connecting to the Cal Park Tunnel Pathway.

The preferred alignment for the Central Marin Ferry Connection Project recommended by the Technical Advisory Committee (TAC) followed the old Northwestern Pacific Railroad right-of-way between Wornum Drive in Corte Madera across Corte Madera Creek and onto Sir Francis Drake Blvd. on a new high level

bridge to Larkspur Landing. The TAC concluded that this option provided the safest, most functional, direct and enjoyable route for pedestrians and cyclists.

After Marin received the Non-Motorized Transportation Pilot Program funding in 2005, the Transportation Authority of Marin reestablished an order of priority for the Central Marin Ferry Project and split the Ferry Connection Project into two segments:

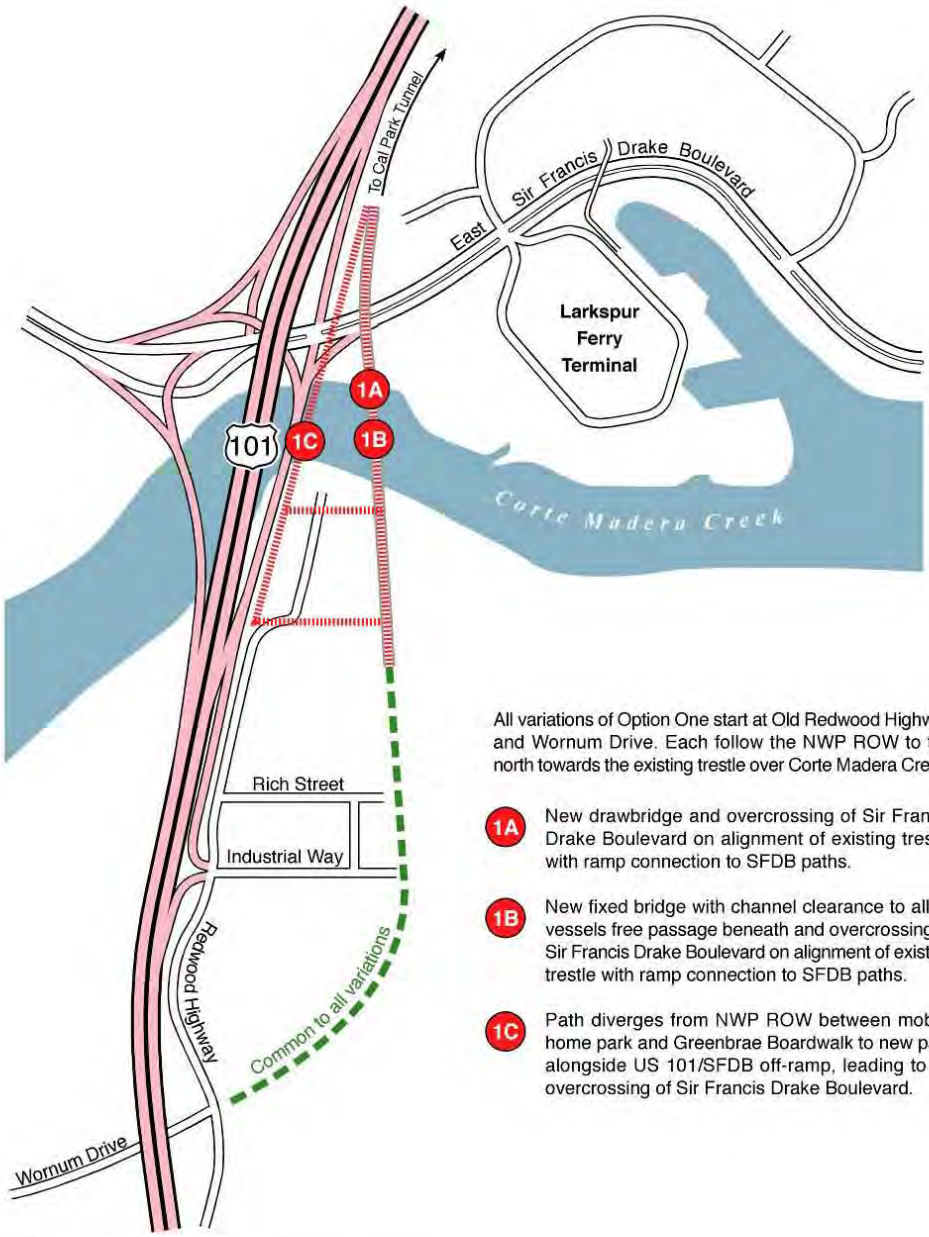
- Phase I: A crossing over Sir Francis Drake Blvd. from the (then soon to be opened) Cal Park Hill Tunnel landing on the South side of Sir Francis Drake and connecting the Cal Park Hill Tunnel path to the bicycle paths on the south side of Sir Francis Drake. The Transportation Authority of Marin will begin building Phase I of the Central Marin Ferry Connection in 2013.
- Phase II: Crossing of Corte Madera Creek from the south side of Sir Francis Drake connecting to the old railroad right-of-way behind the mobile home park, Cost Plus and then connecting to Redwood Highway at Wornum Drive. Preliminary engineering was done on the Phase II crossing of Corte Madera Creek and continuing on the Railroad right-of-way behind the mobile home park and Cost Plus to Redwood Highway, but was abandoned in 2009 by the Transportation Authority of Marin board.

The Greenbrae Interchange Project has been going on for approximately a decade. To date, the Phase II portion of the Central Marin Ferry Connection project has not been included in the Greenbrae/Twin Cities Corridor Improvement Project. However, the Central Marin Ferry Connection Project Phase II preferred option provides the optimal multi-modal safe and separate connections for cyclists and pedestrians to get through a highly dangerous area from Cal Park Hill to the Redwood Highway.

Exhibit D-1(A)

FINAL

CENTRAL MARIN FERRY CONNECTION PROJECT



All variations of Option One start at Old Redwood Highway and Wornum Drive. Each follow the NWP ROW to the north towards the existing trestle over Corte Madera Creek.

1A New drawbridge and overcrossing of Sir Francis Drake Boulevard on alignment of existing trestle with ramp connection to SFDB paths.

1B New fixed bridge with channel clearance to allow vessels free passage beneath and overcrossing of Sir Francis Drake Boulevard on alignment of existing trestle with ramp connection to SFDB paths.

1C Path diverges from NWP ROW between mobile home park and Greenbrae Boardwalk to new path alongside US 101/SFDB off-ramp, leading to an overcrossing of Sir Francis Drake Boulevard.

Larkspur Trestle Bike Path Option I

10/02

Prepared For
City of Larkspur

Prepared By
Alta Planning + Design, Inc.

April 2004

Exhibit D-1(B)

Sir Francis Drake Blvd
101
Drakes View Circle
Corte Madera Creek
Bridge Alt 1C
CMFCP Bridge Alt 1B
450B
Rich St
Industrial Way
Lucky Dr
Nellen Ave
Fifer Ave
Bay Trail
Bay Trail (existing)
BT Commute Route
Commute/Recreational Connector
Recreational BT Route (Preferred Alignment)
X Remove BT Route

2. **Connecting the North South Greenway from Redwood Highway to the Sandra Marker Trail [Exhibits on the following pages]**

   The most critical connection of the North South Greenway relative to the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project is at Wornum Drive. Originally Wornum Drive was the North Pacific Railroad right-of-way. In approximately 1995 Wornum Drive was built as a road in the railroad right-of-way. Highway 101 overpasses Wornum Drive because it was a railroad right-of-way when Highway 101 was built. The 1994 North South Bikeway Plan and the Larkspur and Corte Madera Pedestrian and Bicycle Plans identify the Wornum underpass as the passage from the east side of Highway 101 to the west side of Highway 101, connecting east Corte Madera and Larkspur to west Corte Madera and Larkspur. Wornum Drive is literally 50% in Larkspur (the east side) and 50% in Corte Madera (the west side). When the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project is built the North South Greenway, in particular the connection at Wornum Drive, should be considered the top priority for safe and separate pedestrian and bicycle accommodation from the east side of Redwood Highway to the Sandra Marker Trail.

   a. See Exhibit D-2(A) and D-2(B)

E. Safely and Cost Effectively Completing the North South Greenway from Redwood Highway to the Sandra Marker Trail: Underpasses of Redwood Highway, possible northbound off-ramps to Wornum, and Tamal Vista Boulevard.

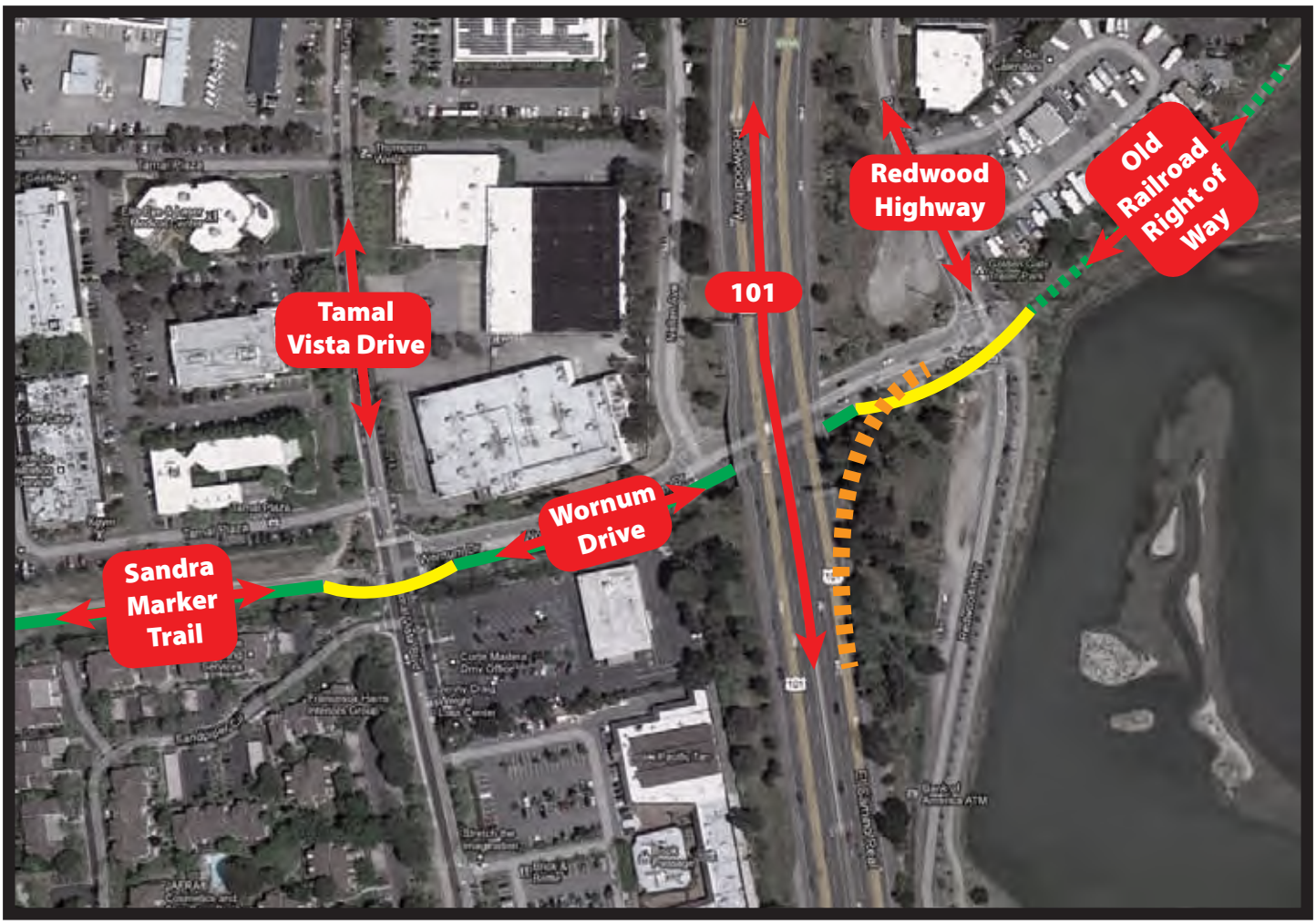
Transportation Alternatives for Marin recommends that Transportation Authority of Marin use underpasses under Redwood Highway and the new freeway off-ramp (if it is built) and underneath Tamal Vista Boulevard as part of the Greenbrae Interchange Project. Please see the document attached titled "#35-Grade-Separated Crossing Treatment" from the City of Boulder Colorado. This document gives a thorough background on crossings, including crossings under water tables. Additionally, it includes information from the City of Boulder as to why bicyclists prefer underpasses (because there is less altitude gain). <u>Cities and Counties prefer underpasses because they can be built for a fraction of the cost of overpasses</u>.

With underpasses connecting the North South Greenway under Redwood Highway, under the new proposed northbound off-ramp as well as under Tamal Vista Boulevard, a safe and separate accommodation for school children, recreational cyclists and neighbors would facilitate travel from one side of Corte Madera to the other, connecting critical portions of our communities without endangering our citizens with automobile collisions.

- Undercrossings of roads for pedestrians and cyclists are the most cost effective.
- Undercrossings of roads for pedestrians and cyclists are the safest.
- Undercrossings of roads for pedestrians and cyclists are the most desired by pedestrians and cyclists.

Exhibit D-2 (A)

CONNECTING THE NORTH SOUTH GREENWAY FROM REDWOOD HIGHWAY TO THE SANDRA MARKER TRAIL



Existing North South Greenway

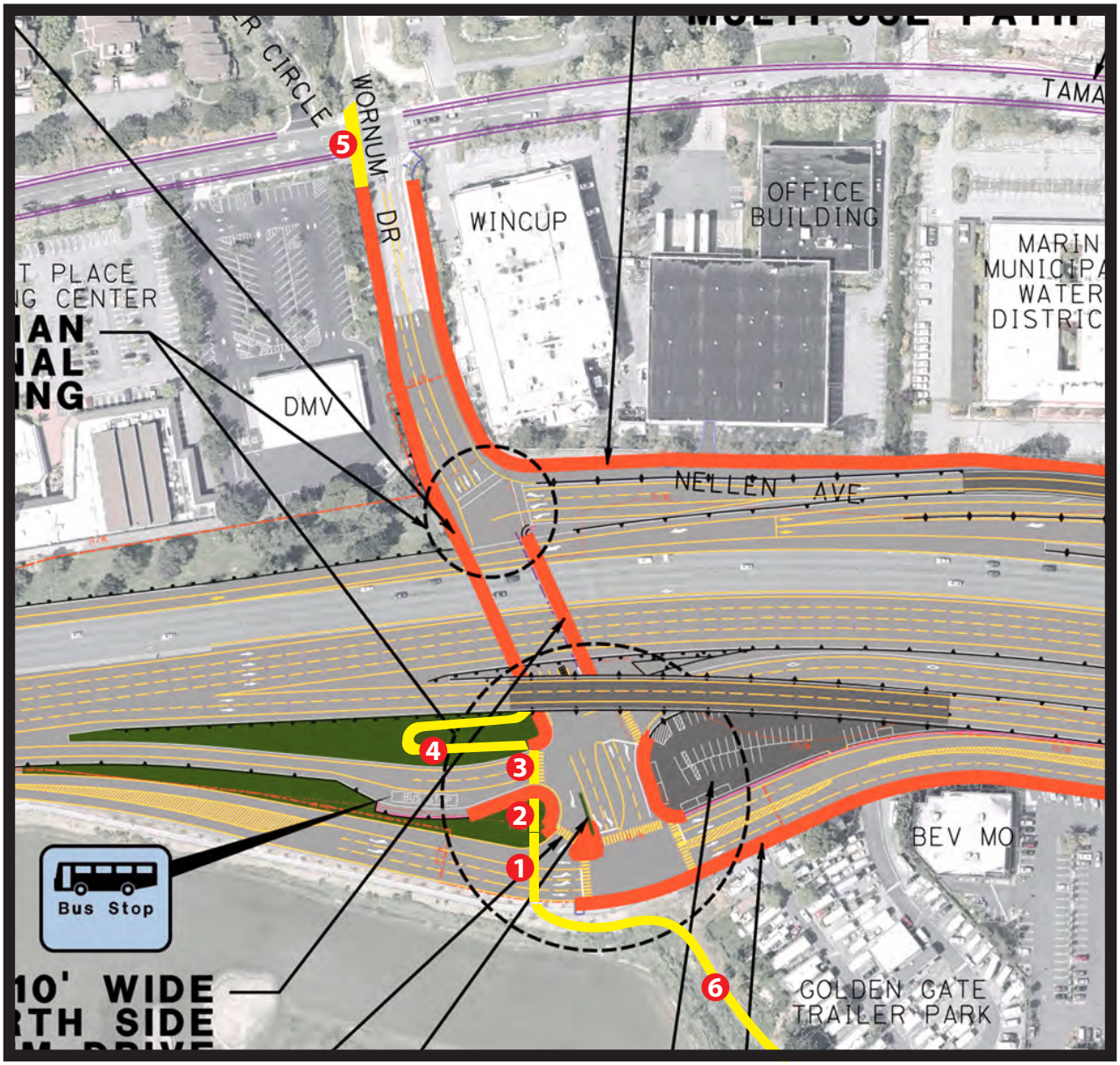
North South Greenway Underpass

Proposed Off-ramp

Future North South Greenway

Exhibit D-2 (B)

Connecting the North South Greenway from Redwood Highway to the Sandra Marker Trail.



1. Redwood Highway Underpass 60’
2. Skylight space between Redwood Highway and Off-ramp 40‘-50’
3. Northbound Wornum Off-ramp Underpass 45’
4. Ramp leading to Wornum Bike Path at Grade on Wornum Drive
5. Proposed Tamal Vista Underpass 80’
6. Phase II Central Marin Ferry Connection

F. Examples of Underpasses [See Exhibits on the following pages]

1. Puerto Suello Hill Underpass Pictures: Exhibit F-1(A) and F-1(B)
2. Boulder, Colorado Underpass Picture: Exhibit F-2
3. Tilburg, Netherlands Underpass Picture: Exhibit F-3

Exhibit F-1 (A)

Puerto Suello Hill Underpass

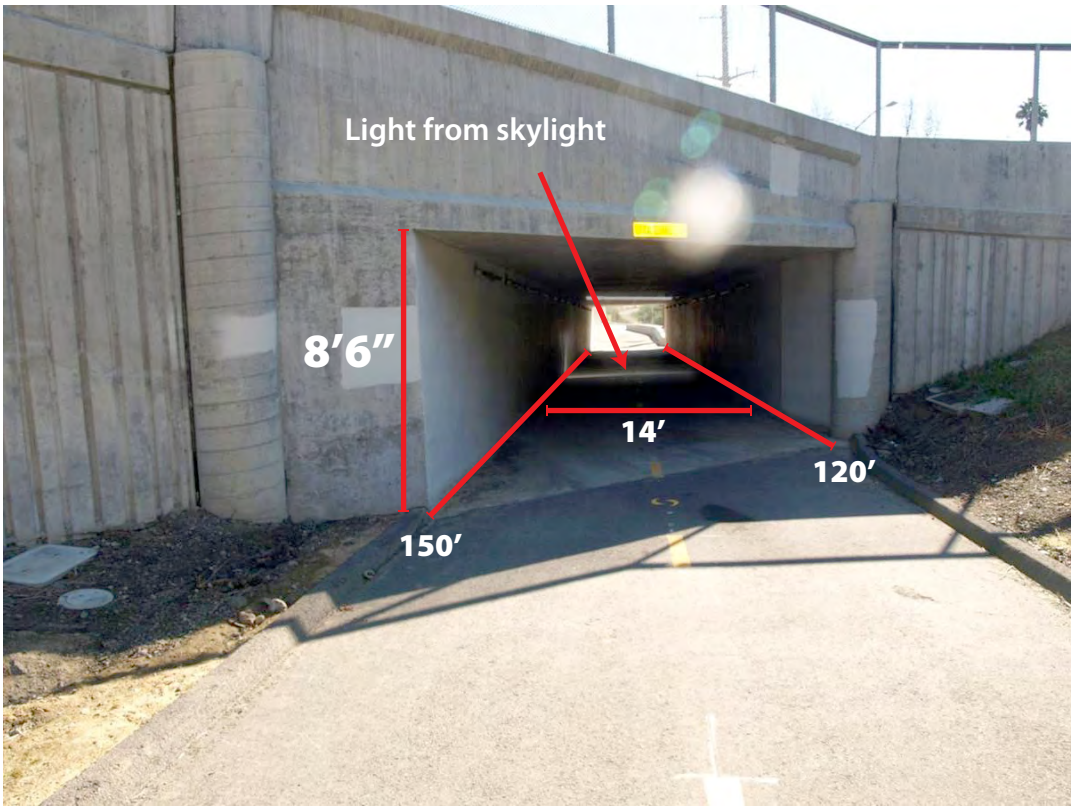
Puerto Suello Hill Path North Entrance Underpass of Lincoln Ave Southbound On-Ramps and Off-Ramps.

Puerto Suello Hill Path South Entrance Underpass of Lincoln Ave Southbound On-Ramps and Off-Ramps.

Exhibit F-1 (B)

Puerto Suello Hill Underpass

Puerto Suello Hill Path South Entrance Underpass of Lincoln Ave Southbound On-Ramps and Off-Ramps.



Dimensions of Puerto Suello Hill Underpass, View from North Entrance of Lincoln Ave Southbound On-Ramps and Off-Ramps.

Exhibit F-2

Boulder, Colorado
Bike Underpass

This trapezoidal structure is considered a best practice for an underpass in the Netherlands.

G. #35- Grade Separated Crossing Treatment from Boulder, Colorado

Please see the attached "#35-Grade Separated Crossing Treatment for Boulder, Colorado" to understand why cities, counties, cyclists and pedestrians prefer underpasses to safely connect pedestrian and bicycle routes.

H. Central Marin Ferry Connection Project Final Report April 2004

Please see the attached complete Final Report from April 2004 for the Central Marin Ferry Connection Project.

I. Ockham's Razor: "The simplest explanation tends to be the right one."

I. Ockham's Razor: "The simplest explanation tends to be the right one."

William of Ockham (c. 1285-1349)

Completing the North South Greenway from the Cal Park Hill Tunnel to the Sandra Marker Trail would be the optimal transportation improvement in the Greenbrae/Twin Cities Corridor Improvement Project.

- A continuous, safe and separate accommodation for pedestrians and bicycles from Andersen Drive in San Rafael to Tamalpais Drive in Corte Madera will be created through connecting the Cal Park Hill Tunnel over Sir Francis Drake then crossing Corte Madera Creek, continuing on the railroad right-of-way south of Corte Madera Creek to Redwood Highway and to the Sandra Marker Trail.

- Connecting Cal Park Hill Tunnel to the Sandra Marker Trail will:

    - ✧ Provide the greatest increase in safety to the most vulnerable transportation groups: Pedestrians and Cyclists.

    - ✧ Be the safest accommodation to pedestrians and cyclists in the Greenbrae/Twin Cities Corridor Improvement Project.

    - ✧ Increase mobility in the Greenbrae/Twin Cities Corridor Improvement Project area of influence.

    - ✧ Create the best opportunity to decrease congestion by:

        - Facilitating alternative access to the Larkspur Ferry from San Rafael, Larkspur, Corte Madera and the Ross Valley

        - Connecting East Corte Madera to West Corte Madera and Larkspur

        - Enabling safe access to schools from East Corte Madera to West Corte Madera and Larkspur, including Redwood High School and College of Marin

        - Connecting Larkspur and Corte Madera to the Downtown San Rafael Transit Center

#35 – Grade-Separated Crossing Treatments

BOULDER, COLORADO

Cris Jones, Transportation Planner, Boulder, CO
Contributions by Bill Cowern (Traffic Operations Engineer), Annie Noble (Greenways Coordinator) Marni Ratzel (Bike and Pedestrian Planner) and Randall Rutsch (Senior Transportation Planner).

Background

For over a century, Boulderites have been getting around by bicycle. The city did not, however, emphasize bicyclists and pedestrians in the design of transportation facilities until the 1980s. The 1989 Transportation Master Plan (TMP) brought with it some major changes in how the city viewed transportation. Transportation's emphasis was moved away from primarily focusing on the automobile, and shifted toward a balanced view of transportation that fully included options like walking, biking, and taking the bus.

Since 1989, the city has seen many changes in transportation facilities, particularly for bicyclists. The planned network of primary and secondary bicycle corridors is largely complete, minus a few key connections that remain to be built. A network of continuous paths along Boulder Creek and its tributaries is 70 percent built. Today, Boulder's bike and pedestrian facilities are among the best in the country.

The city recognizes the importance of providing a variety of transportation options that allow citizens to travel safely and efficiently. All of Boulder's transportation facilities include several elements that have been embraced by the community. Bike and pedestrian underpasses have been such a success that they are now used throughout the city. In explaining how the city has come to provide over 55 underpasses, it is important to consider the history leading to their construction.

In 1910, Frederick Law Olmsted, Jr. warned the city of Boulder of the dangers of allowing development to encroach upon the floodplain of Boulder Creek. He recommended against the construction of a deep, artificial flood channel to facilitate development in the floodplain. Instead he suggested that Boulder Creek be allowed to remain in a small shallow channel for the ordinary stages of the stream, while including a much broader floodplain as a channel during larger storms. Recognizing the need to dedicate this floodplain land to a useful purpose, he suggested creating a space for public use.

In 1969, a moderate flood affected the city of Boulder. The following decade marked the city's first serious flood control efforts. Initial investigations focused on traditional flood mitigation techniques, such as hard-lining stream channels and using concrete structural facilities to channelize stream flow. These plans, however, conflicted with the city's commitment to improve both quality of life and the urban environment, and evoked considerable public opposition.

With the goal of maintaining and enhancing the aesthetic and environmental integrity of Boulder Creek and its tributaries, the city decided to pursue alternative solutions to flood control. In 1978, the city adopted a "non-containment" policy for Boulder Creek as part of the Boulder Valley Comprehensive Plan. This policy promoted ongoing city efforts to protect public safety by restricting development within the floodplain of Boulder Creek and its tributaries.

In 1984, the city adopted the Boulder Creek Corridor Plan that recommended development of a continuous path along the entire length of Boulder Creek. This corridor would serve both as a flood hazard mitigation measure and as a continuous urban park for recreational and transportation use. It would also serve to restore and enhance wetlands along with fish and wildlife habitats.

Figure 1. Construction of the Boulder Creek Path underpass at Broadway.

Figure 2. The completed Boulder Creek Path underpass at Broadway.

Figure 3. Pedestrian underpass at College and Broadway.

The construction of a continuous shared-use facility required separated grade crossings at each intersection throughout the corridor. Existing creek underpasses were converted to include shared-use path underpasses through fairly simple modifications. Upon its completion, the Boulder Creek Path was instantly popular and quickly became a much loved community amenity (figures 1 and 2).

The public acclaim of the Boulder Creek project led to an increase in public discussion about the desirability of extending and continuing the concept of the Boulder Creek project along Boulder Creek's tributaries within the city. As a result, the city designated over 32.2 km (20 mi) of stream corridors along six tributaries of Boulder Creek for inclusion in the Greenways Program.

Countermeasures

Today, the city of Boulder is home to more than 55 underpasses built to serve bicyclists and pedestrians. While most new underpass projects are driven by the transportation department, underpasses often have benefits beyond transportation. New underpasses along Boulder's greenways have increased flood carrying capacity and improved the natural environmental systems along Boulder Creek and its tributaries.

Although most underpasses have been built as a part of Boulder's greenway system, a number of underpasses have been constructed at locations not along a waterway. These underpasses serve to eliminate pedestrian barriers and increase safety at dangerous intersections. The College and Broadway underpass, for instance, was designed with the sole purpose of increasing pedestrian safety.

Before construction of the College and Broadway underpass, thousands of students a day were forced to cross Broadway (U.S. Highway 92) at grade, in order to get between campus and the University Hill commercial district. Students often crossed (midblock) and would stand in the median before crossing entirely. Unlike most of the underpasses within the city, the Broadway and College underpass required a lengthy public process before construction. This was largely because of concerns from the merchants in the Hill commercial district. Merchants worried that an unattractive or poorly designed underpass would be perceived as unsafe and discourage pedestrian traffic to their businesses. The city went through an extensive design process, including obtaining public input, and creating photo simulations of the proposed design to gain community acceptance (see figure 3).

Evaluation and Results

The success and support of Boulder's underpasses is measured by several elements benefiting the community. These include increasing the safety and convenience of bicycle and pedestrian travel, promoting their use, and in the case of the Greenways system, providing a continuous grade-separated system appropriate for users who are not

comfortable using the on-street system. The city currently employs several methods to assess the value of its underpasses relative to its transportation goals. These methods include automated pedestrian and bike counts and periodic surveys used to calculate bicycle and pedestrian mode share.

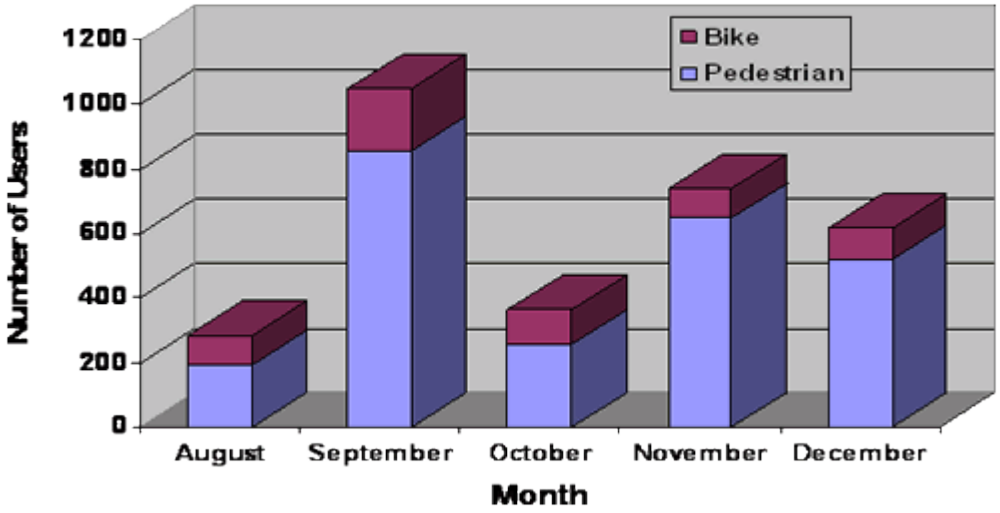
In addition to routine evaluation methods, the city updates its Transportation Master Plan (TMP) approximately every six to seven years in order to ensure the city is working toward the current needs of the community. The 1989 TMP created a vision of a grade-separated system along Boulder's greenways. This vision was refined in the 1996 TMP update with its recognition of different types of users from the novice to the experienced commuter and goal of providing facilities for all types of users. Underpass construction continues to be strongly supported by Boulder citizens and evaluation of TMP policies will determine the extent of future construction.

The planning and design efforts resulted in an award-winning project widely hailed as a complete success. Today, the College and Broadway underpass allows thousands of bicyclists, pedestrians, and motor vehicles to travel freely and safely through the intersection every day.

As mentioned above, several methods are employed to evaluate underpass use and benefit. User counts are performed at several locations throughout the city including the Broadway and College underpass. Although counts are not available for dates prior to construction, current counts indicate a high number of users. If the underpass did not exist, current users would be forced to cross Broadway at grade (figure 4). Counts at Broadway and College are taken once a month from 4:45pm to 5:30pm.

In addition to performing manual counts, the city operates several automated bike counters along several shared-use pathways. These counters monitor use 24 hours a day, 365 days a year. Counts have revealed fairly stable use of about 600 to 800 cyclists per day year-round, excluding days of extreme cold, precipitation, and high winds.

Figure 4: College and Broadway Fall 2002 Users



Conclusions and Recommendations

As the city of Boulder continues to move toward completing its greenway corridors, it is important to consider the factors that have lead to the city's success (for other communities interested in building a similar system). As mentioned above, much of the success of the greenways system and its underpasses can be attributed to a community that views such a system as beneficial. It also is important to remember that the system has not been built entirely on city dollars. About 50 percent of funding has come from federal resources.

Costs and Funding

The cost of constructing a grade-separated transportation system is a discouraging factor for many communities. It often is purported that high sales tax revenues have afforded the city's desire to construct such an extensive multi-modal transportation system. In actuality, Boulder's sales tax revenues are average among cities of similar size. It is the community's vision of responsible growth and commitment to a multi-modal network that has driven transportation efforts in the city. In addition to commitment, the rapid and extensive construction of underpasses throughout the city has depended on funding leverage. Many underpass projects have received federal funding based on flood mitigation elements. Please see the table listing of some recent underpass projects and their funding sources.

Table 3

Greenway	Project	Description/Goals	Funding
South Boulder Creek	Central to Stazio	Trail construction including low water crossing and railroad underpass.	$67,000 (Lottery) $70,000 (Flood Control)
Bear Creek	Baseline to US 36 though CU property	One underpass and trail connections to CU Main campus, Apache Trail and Williams Village.	$8,700 (Transportation) $58,000 (Flood Control) (FAUS)
1992			
Wonderland Creek	Broadway Underpass	Flood capacity increase, channel restoration, riparian vegetation restoration, wetland and pond creation.	$45,000 (Transportation)
Wonderland Creek	Valmont Underpass	Flood capacity increase, trail underpass.	$30,000 (Transportation) $45,000 (Flood Control) (FAUS)
South Boulder Creek	Stazio to Arapahoe	Paved trail construction, railroad underpass, wetland creation.	$57,000 (Lottery) $6,000 (Transportation) $55,000 (Flood Control)
1993			
Bear Canyon Creek	Mohawk to Gilpin	Riparian habitat widening and restoration, wetland creation, landscaping and two underpasses, trail construction.	$28,000 (Lottery) $55,000 (Transportation) $84,000 (Flood Control)
South Boulder Creek	Arapahoe Underpass	Trail underpass.	$93,000 (Lottery) $55,000 (Transportation) $45,000 (Flood Control)
South Boulder Creek	EBCC Pedestrian Bridge	New trail bridge and soft-surface trail approaches.	$18,000 (Lottery) $2,000 (Flood Control)
1994			
Bear Canyon Creek	Martin to Moorhead	Food improvements, two underpasses, trail connections.	$148,000 (Lottery) $335,000 (Transportation) $599,000 (Flood Control)
1995			
Fourmile	Broadway Underpass	Trail underpass and flood capacity improvements.	$4,000 (Lottery) $75,500 (Transportation) $10,000 (Flood Control)

Goose Creek	Trail Connection at 30th Street	Trail through new 30th Street underpass to Mapleton.	$9,000 (Transportation) $1,000 (Flood Control)
Bear Creek	Mohawk Underpass	Trail underpass and flood capacity improvements.	$93,000 (Transportation) $75,000 (Flood Control) $200,000 (Urban Drainage)
1997			
South Boulder Creek	Baseline to EBCC	Underpass, habitat restoration and trail connection.	$61,000 (Transportation) $82,000 (Lottery) $52,000 (Flood Control)
Bear Creek	Gilpin Underpass	Flood control, pedestrian and bicycle underpass.	$6,500 (Lottery) $63,000 (Flood Control) $211,000 (Transportation) $97,000 (Urban Drainage)

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- Noble, Anne. *Greenways Master Plan*. City of Boulder: 2001.
- Smith, Phyllis. *History of Transportation in Boulder*. City of Boulder: 1989.

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FINAL

CENTRAL MARIN FERRY CONNECTION PROJECT

Prepared For
City of Larkspur

Prepared By
Alta Planning + Design, Inc.

April 2004

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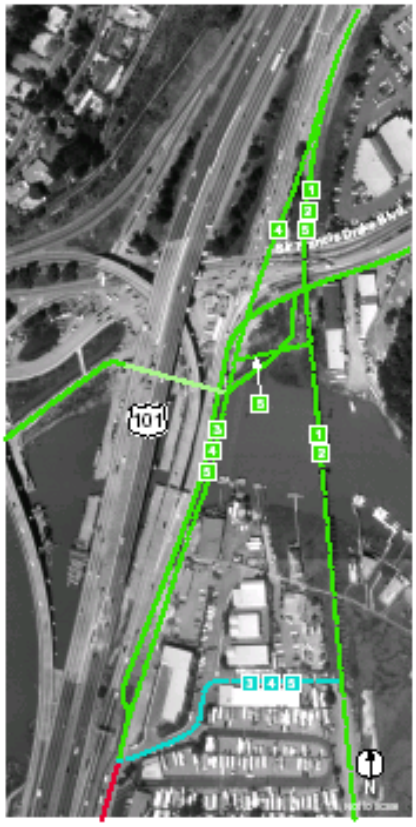
EXECUTIVE SUMMARY

The Central Marin Ferry Connection (CMFC) project was first identified in the Marin County Bicycle and Pedestrian Master Plan (2000) as one of the top 25 most important projects in Marin County for a number of reasons:

1. It is at the crossroads of almost all trips between central and southern Marin County.
2. It serves the Larkspur Ferry Terminal, a major destination and one that is easily accessible by walking or bicycling from many residential areas.
3. The current situation is inadequate to encourage more bicycling and walking within the corridor.
4. It connects numerous school, shopping, recreation, and commuter routes and existing bikeway segments.

This project is located on the east side of U.S. 101 between the East Sir Francis Drake Boulevard (ESFD) corridor on the north and the communities of Larkspur and Corte Madera on the south. This corridor provides access to many important destinations including the Larkspur Landing Shopping Center, Bon Air Shopping Center, Marin Central Plaza, Drakes Landing, Larkspur Ferry Terminal, and the residential communities at Greenbrae Boardwalk, Marin RV Park, Golden Gate Trailer Park, and the apartments at Larkspur Landing. In addition, this project connects to existing trail systems along Corte Madera Creek, the trails along Paradise Drive in Corte Madera, and the trail system in Larkspur and Corte Madera within the abandoned Northwestern Pacific Railroad corridor.



The five options for the CMFC project as illustrated in the 2000 Marin County Bicycle and Pedestrian Master Plan.

Currently, the U.S. 101 Corte Madera Creek overcrossing does provide bicycle and pedestrian access over the creek, but this connection consists of a narrow sidewalk on the east side that places users very close to high-speed traffic and a narrow separated pathway on west side of the highway that requires bicyclists to dismount. The purpose of the Central Marin Ferry Connection Feasibility Study is to determine a more user-friendly alignment.

In early 2002, the City of Larkspur received a Bay Trail Planning Grant to initiate research into this project. Alta Planning + Design was hired to review the five corridor

alignment options mentioned in the Marin County Bicycle and Pedestrian Master Plan, develop and eliminate others as relevant, and to recommend a preferred alignment. This study and accompanying preliminary design documents are the result of that planning grant.

PROJECT ALTERNATIVES

Two major alternatives were developed, each with three sub-options. The primary alignments were defined as either (1) a multi-use path along the NWP right-of-way, or (2) a Class 1 multi-use path along Redwood Highway.

ALTERNATIVE ONE – Locate a multi-use path on the NWP right-of-way starting at Wornum Drive.

Sub-Option 1A – *NWP/Drawbridge*

- The multi-use path follows the NWP right-of-way from Wornum/Redwood Highway northward across a rehabilitated trestle and drawbridge, connecting to the south side of East Sir Francis Drake Boulevard (ESFD) on a new ramp.
- A new drawbridge would be installed at Corte Madera Creek.
- The pathway could continue across ESFD on a new bridge as part of a future connection to Cal Park Tunnel and/or Larkspur Landing.
- The multi-use path would fall entirely within the NWP right-of-way.

Sub-Option 1B – *NWP/Ramped Bridge*

- This option is similar to Sub-Option 1A but rather than using the existing trestle and drawbridge across Corte Madera Creek, the existing trestle and drawbridge would be removed and a new fixed bridge constructed within the NWP right-of-way. The bridge would provide sufficient clearance to meet Coast Guard requirements and utilize the existing concrete abutments.

Sub-Option 1C – *NWP/Off-ramp*

- The multi-use path follows the NWP right-of-way from Wornum/Redwood Highway up to a new east-west easement to be purchased from the property owner. The easement would take the pathway to the frontage road, and connect to the new U.S. 101 bridge and pathway as described below under Alternative 2. This is a hybrid option between Alternatives 1 and 2, taking advantage of the NWP right-of-way while avoiding the problems with the trestle and drawbridge. A new ramp connects the off-ramp path with the existing at-grade SFDB paths.
- On the north side of Corte Madera Creek, the path could cross over ESFD on a new bridge that meets the NWP right-of-way on the north side of the road. Although this crossing is within the scope of the CMFC project, it would most likely be constructed as part of a future connection to the Cal Park Tunnel or Larkspur Landing.

ALTERNATIVE TWO – Locate a Class1 multi-use path along the west side of Redwood Highway from Wornum Drive northward.

Sub-Option 2A – *Redwood Highway/Off-ramp*

- A 10- to 12-foot wide Class 1 multi-use path would be installed along the west side of Redwood Highway from Wornum Drive to the existing pathway location leading onto the Corte Madera Creek U.S. 101 bridge.
- The Class 1 path would lead directly to a new bridge structure on the U.S. 101 ESFD off-ramp bent caps. A new ramp would connect the off-ramp path to the existing at-grade ESFD paths.
- On the north side of Corte Madera Creek, the path could cross over ESFD on a new bridge that meets the NWP right-of-way on the north side of the road. This would likely be constructed as part of a future connection to the Cal Park Tunnel or Larkspur Landing.

Sub-Option 2B – *Redwood Highway/Off-ramp/Trestle*

- This is essentially the same as Sub-Option 2A, except that a new wooden trestle would link to the existing historic trestle rather than constructing a new bridge directly from the new U.S. 101 off-ramp bridge. This elevated structure could be constructed directly over the existing boardwalk in this area. From that point the path could continue over ESFD on a new bridge to be constructed if and when the Cal Park Tunnel project moves forward or a connection to Larkspur Landing is sought.

Sub-Option 2C – *Redwood Highway/Off-ramp/No SFDB Crossing*

- This is essentially the same option as 2A and 2B except that rather than a new bridge over ESFD, users are simply directed along the south side of ESFD to the existing signals and crosswalks at Larkspur Landing Circle.

The ability to construct a project in phases can be an important element because it may allow for agency location of funds over time, rather than all at once. The three phases of all options include the southern section along the NWP right-of-way between Corte Madera Creek and Wornum Drive (Phase 1), crossing Corte Madera Creek to East Sir Francis Drake Boulevard (Phase 2), and crossing East Sir Francis Drake Boulevard to connect to Larkspur Landing and the future Cal Park Tunnel bikeway (Phase 3).

EVALUATION

A decision matrix with clearly described criteria and scoring was used to evaluate each project alternative. The evaluation criteria were based on the overall project goals and were weighted to reflect the relative importance of each category. This criterion was then used to evaluate each of the alternative alignments. The criteria used for the CMFC alternatives was as follows:

- Vehicle Conflicts / User Safety
- Functionality / Access
- Usage
- Cost
- Compatibility with Plans
- Potential Implementation Problems
- Ease of Implementation
- Public Support
- Privacy / Security
- North-South Bikeway
- Right-of-Way
- Environmental / Wetland Impacts
- Cultural Resources
- Noise / Health
- Aesthetics / Visual Impacts

Alternative 1B scored the highest due to the complete separation from motor vehicle traffic, functionality, directness, maximum usage potential, aesthetics, and public support. Alternative 1A also scored well because of the same characteristics as 1B, but implementation complications prevented it from outscoring 1B. Alternatives 2A, 2B, and 2C scored lowest due to the combination of a less-than-desirable environment to walk or bicycle (due to the proximity to U.S. 101), and/or the cost.

The Technical Advisory Committee reviewed and discussed the results of this screening process with the result that three preferred alignments (1A, 1B, and 1C) were identified for more in-depth analysis. Alternative 1A was determined to have several significant problems. This includes inherent problems with operating a drawbridge and the condition of the drawbridge itself. Due to these and other problems, Alternative 1A was dropped from consideration.

Alternatives 1B and 1C more closely meet the goals and objectives of the Technical Advisory Committee (TAC). Alternative 1B scores the highest based on the criteria discussed previously and is a preferred option of the TAC, but there are six major obstacles that need to be overcome:

1. Finding an agency willing to take on the construction, operation, and maintenance of a new high-level bridge
2. Compatibility with future SMART plans
3. Controversy surrounding loss of trestle and drawbridge
4. Environmental impacts to the wetlands during construction
5. Visual impacts from a high level bridge
6. Easement acquisition through the Marin RV Park

Alternative 1C contains many of the advantages of Alternatives 1A and 1B, but is not as direct as either of those options. Safety issues would be minimal since a single traffic conflict would occur at the un-signalized crossing of Redwood Highway on its northern section where low traffic volumes exist. The Class 1 path in the NWP right-of-way and the new bent cap structure could be completed with minimal environmental impact. However, potential fatal flaws for this

alignment include potential conflicts with future Corte Madera Creek U.S. 101 widening, the need for Caltrans approvals, and the need to acquire the easement through the mobile home park.

TAC RECOMMENDATION

After reviewing the materials developed in this feasibility study, the Technical Advisory Committee unanimously recommended the following at their February 4, 2004, meeting:

- The preferred alignment for the Central Marin Ferry Connection project is Alternative 1B, which essentially follows the old Northwestern Pacific Railroad right-of-way between Wornum Drive in Corte Madera, across Corte Madera Creek, and on to East Sir Frances Drake Boulevard on a new high-level bridge to Larkspur Landing. The TAC concluded that this option provides the most functional, direct, and enjoyable route for pedestrians and bicyclists. Potential problems with the high-level bridge include maintenance costs and environmental impacts, which have not been analyzed yet, although BCDC has given it preliminary approval.
- Should a high level bridge not be feasible for maintenance or environmental impact reasons, Alternative 1C would be the preferred alignment. This route follows the Northwestern Pacific Railroad right-of-way from the south, crosses over the U.S. 101 northbound Sir Frances Drake off-ramp via a new easement on the north edge of a mobile home park, and crosses Corte Madera Creek on the bent caps of the highway structure.
- The TAC also recommends that the lead agency status of the MOU partners be changed from the City of Larkspur to the Marin County Congestion Management Agency, subject to discussions between those agencies.

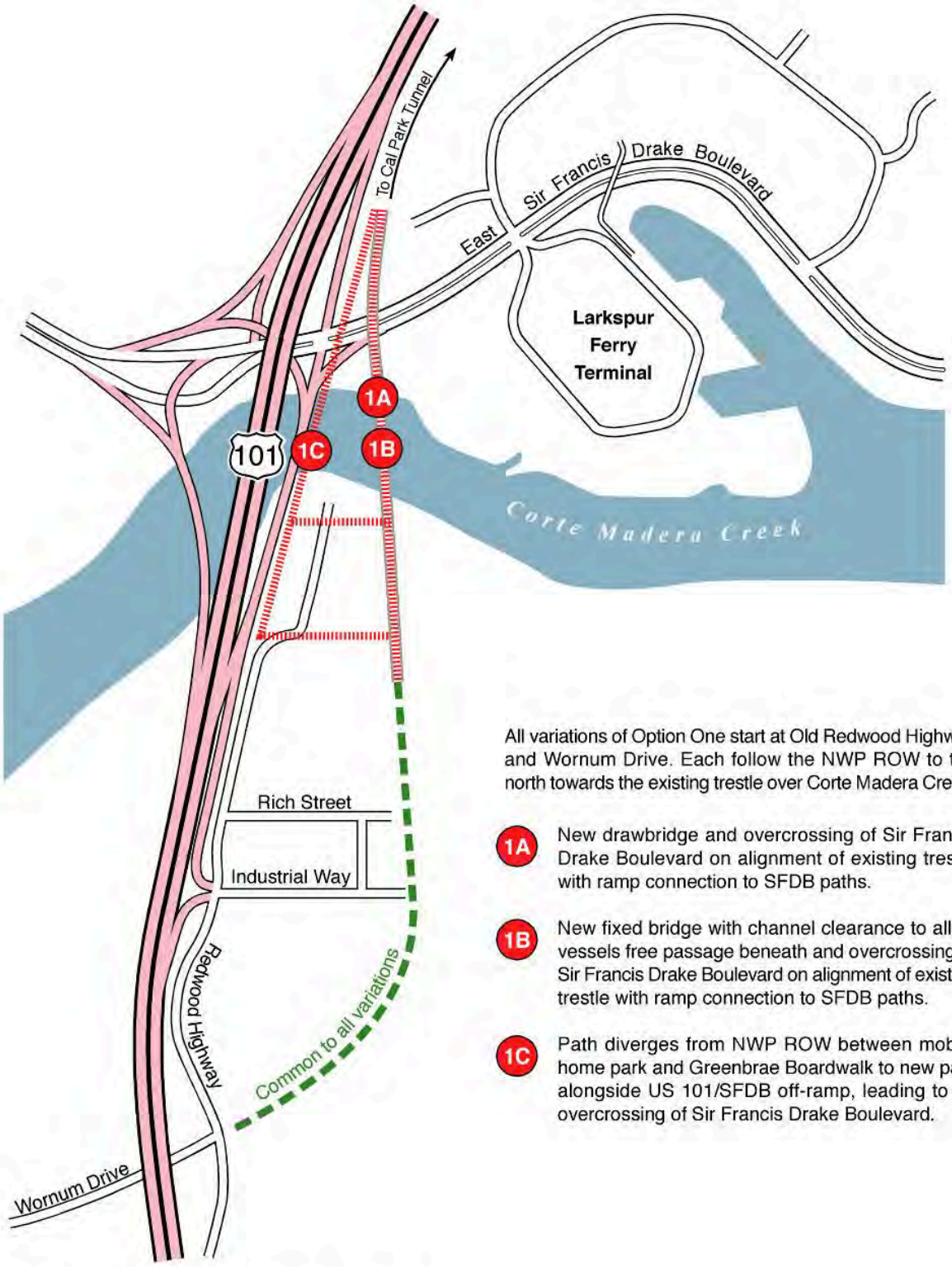
Based on the analysis in this report and input from the four participating agencies and the TAC, the following recommendations are made:

1. **Proceed with Phase I.** Continue planning, design, and implementation of the Phase I segment of the project, which is a new Class I pathway on the NWP right-of-way from Wornum/Redwood Highway to the Marin RV Park, and from that point to a new easement on the perimeter of the RV Park to Redwood Highway. This effort includes obtaining a new easement on the perimeter of the Marin RV Park, and possibly modifying or removing some existing tenants on the NWP right-of-way at the end of Industrial Way to allow for a pathway. This would provide a new Bay Trail segment, and enhance access to the existing sidewalk on the U.S. 101 Corte Madera Creek overcrossing.
2. **Seek Policy Guidance.** The decision to proceed with Alternative 1B is a policy decision among the four member agencies participating on this project. Staff from each of the agencies should provide their recommendations in a Staff Report, supported by the TAC recommendations. Each of the alternatives has significantly different costs, advantages,

and disadvantages. Policy guidance is required as to the feasibility and desirability to take on new maintenance responsibilities for a major new structure over Corte Madera Creek.

3. **Identify an Implementation Agency.** The funding application and MOU for the project states that Marin County will take the lead in implementing this project. The MOU states: "The City of Larkspur will request that the Marin County Congestion Management Agency consider assuming responsibility for subsequent projects to complete the work initiated by this grant, as the Congestion Management Agency generally coordinates multi-jurisdictional projects." The partners on this project need to resolve the issue of who will lead the implementation phase.

4. **Proceed with Planning and Design.** Continue working with Caltrans and other agencies in the development of plans and designs for Alternative 1B. Work with the four partner agencies to ensure good connectivity southward into Corte Madera, and northward linking to the Cal Park Tunnel project.



All variations of Option One start at Old Redwood Highway and Wornum Drive. Each follow the NWP ROW to the north towards the existing trestle over Corte Madera Creek.

1A New drawbridge and overcrossing of Sir Francis Drake Boulevard on alignment of existing trestle with ramp connection to SFDB paths.

1B New fixed bridge with channel clearance to allow vessels free passage beneath and overcrossing of Sir Francis Drake Boulevard on alignment of existing trestle with ramp connection to SFDB paths.

1C Path diverges from NWP ROW between mobile home park and Greenbrae Boardwalk to new path alongside US 101/SFDB off-ramp, leading to an overcrossing of Sir Francis Drake Boulevard.

Larkspur Trestle Bike Path
Option I

10/02

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February 14, 2013

Valerie Shearer, Senior Environmental Planner
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Dear Ms. Shearer,

The Marin County Bicycle Coalition (MCBC) appreciates the opportunity to provide comments on the Draft Environmental Document for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project.

MCBC has been active in advocacy for 15 years in Marin County and has the primary goal of making the roads safer for cyclists and pedestrians. We achieve this end by working to ensure that any and all road or road-related projects consider the needs of cyclist and pedestrian safety as a top priority. It is within this context that MCBC submits the following comments.

Overall General Comments re: Bicycle/Pedestrian Circulation
MCBC has been involved in the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project for nearly 10 years. As part of the process of creating the bicycle/pedestrian improvements within the project area, MCBC met with Transportation Authority of Marin (TAM) staff and provided comments on many occasions since then. While MCBC has been and continues to be satisfied with many of the improvements that are proposed as part of this project, it was not until early 2012 that we inadvertently learned that the pedestrian overcrossing (Highway 101 bike/ped overcrossing) was to be removed; MCBC nor the public were ever officially notified of this decision by TAM.

Since early 2012, MCBC has been working to compel TAM to develop and include plans to replace the pedestrian overcrossing, but TAM has insisted that new facilities on Wornum Drive would be adequate- MCBC strongly disagrees.

MCBC seeks to develop completely safe and separated (from cars) facilities for cyclists and pedestrians where possible. The plan to have Wornum Drive be a de-facto replacement for the freeway overcrossing violates the most fundamental principles of our organization and conflicts with principles that surround creating walkable/bikable communities here in Marin. The fact is that the Wornum Drive undercrossing will endanger users significantly

more than the current Highway 101 bike/ped overcrossing for the simple reason that grade-separated overcrossings are conflict-free transportation facilities. Under the current plan, Wornum will have increased traffic fed by two freeway offramps and one freeway onramp, increasing the number of potential conflict points significantly. In terms of safety for cyclists and pedestrians, this is an unacceptable replacement for the existing Highway 101 overcrossing.

The Marin County Bicycle Coalition circulated a petition regarding the need for a grade-separated crossing of Highway 101 beginning in December 2012. It is attached at the bottom of this document as Appendix A.

Section 1.2 Purpose and Need
This section includes a bullet indicating that the project has the purpose to:
"Improve pedestrian and bicycle access through the Greenbrae/Twin Cities Corridor"

MCBC believes that the Purpose and Need are not being met with the removal of the Highway 101 bike/ped overcrossing without a similarly safe and separate-from-cars crossing of Highway 101 being built to replace it.

1.2.2 Project Need
1.2.2.1 Capacity, Transportation Demand, and Safety
This section focuses on roadway safety for automobile traffic on Highway 101. There is no mention of potential dangers that pedestrians might encounter using Wornum Drive. This too should have been evaluated. In California, 27% of traffic fatalities are cyclists and pedestrians; grade-separated facilities in highly congested areas, especially near freeway corridors, are the best way to reduce collisions with cars and to ensure the safety of those that choose to use active transportation.

1.2.2.3 Modal Interrelationships and System Linkages
The last sentence in the following (bold text) paragraph should be removed or modified. The heavily used, existing Highway 101 overcrossing does not "exacerbate limited connectivity" as the sentence indicates. The Highway 101 overcrossing, in fact, does quite the opposite. It enhances connectivity by providing a safe and separate facility over Highway 101. The fact that it is not ADA compliant is true; it is vital that a new overcrossing be built and that it be ADA compliant, thereby further enhancing the benefits of a Highway 101 overcrossing for all users.

"Existing multi-use paths are heavily used by pedestrians and bicyclists to reach residential, commercial, and community destinations, as well as local and regional transit facilities along the Greenbrae/Twin Cities Corridor. Access to alternative modes of transportation, such as the Larkspur Ferry Terminal, regional and local bus stops, and multi-use bicycle and pedestrian pathways is constrained by the limited connectivity across Corte Madera Creek, as well as to the east and west sides of US 101. ***This situation is further exacerbated by the existing pedestrian overcrossing at Nellen Avenue, which does not comply with the standards of the Americans with Disabilities Act (ADA)."***

1.3.1 Alternatives
1.3.1.1 Build Alternative
Improvements to Pedestrian, Bicycle, and Transit Facilities
The bullet in this section that indicates, "*Removing the existing non-ADA compliant pedestrian overcrossing near Lucky Drive/Nellen Avenue*" should be moved or deleted. This is *not* an

Improvement but a loss for cyclists and pedestrians crossing Highway 101 and should not be under the section indicating “improvements”.

The bullet that indicates, “*Constructing a southbound bike lane and a northbound multi-use path along Redwood Highway to allow for safe bicycle operations*” is under discussion with TAM, the Bay Trail and MCBC. This description is one of a few options being discussed regarding maximizing safety for cyclists and pedestrians on Redwood Highway. MCBC suggests generalizing the sentence by changing it to, “Constructing bike lanes and/or a multi-use path along Redwood Highway to allow for safe bicycle/pedestrian operations”.

The first sentence of the following paragraph (in bold text below) should be removed. Removal of this structure does *not* improve bicycle pedestrian access in the area as stated but will instead make crossing Highway 101 more dangerous.

“***Removal of the existing noncompliant ADA pedestrian overcrossing near Lucky Drive/Nellen Avenue****, in combination with the enhanced pedestrian and bicycle access along Lucky Drive, Fifer Avenue, between Fifer Avenue and Wornum Drive, will improve the bicycle and pedestrian access in the area. Pedestrian and bicycle improvements proposed as part of the project will effectively close the gap in these facilities and improve access through the corridor”*

1.3.2 Planned Development
Land Use Assumptions
This section lists 6 future land developments that could be built in the vicinity. There are several additional potential developments near the project area that should be included in an updated list in the final environmental document. Even given this low estimate of future developments in the area, there will be a substantially larger number of people living in the area than there are now over the coming years. To help reduce traffic and to maximize incentives for walking and biking in the area, there needs to be a safe and separate bicycle/pedestrian crossing of Highway 101. This need for a safe crossing of Highway 101 is even greater when considering that the Larkspur Ferry, the SMART train and the Cal Park Tunnel (all significant transportation elements in the area) are just adjacent to this project and many residents of these developments will want to have access to them by walking or biking.

2.1 Issues with No Adverse Impact
Community Impacts
Community Character and Cohesion
The determination that the proposed improvements will not negatively affect community cohesion is inaccurate. While the project will result in the installation of bicycle and ADA-compliant pedestrian improvements, these provisions do not address the new problems being presented by the removal of the Highway 101 bike/ped overcrossing, including the potential increase of cars using Wornum Drive, as well as the addition of multiple on/off-ramps that cyclists and pedestrians using Wornum Drive will be forced to navigate when attempting to cross the freeway. Specifically, hazards on Wornum Drive include cyclists and pedestrians being forced to cross numerous lanes of heavy traffic, including some double right turn lanes. Right turn lanes, particularly double right turn lanes, present a well-known danger to pedestrians and cyclists. Such dangers will likely create incentives for people to drive cars instead of walking and biking across Highway 101. This issue should be evaluated in the final environmental document.

CEQA requires determination of whether a proposed project will physically divide an established community. The Mitigated Negative Declaration incorrectly states that no new physical or perceptual barriers will be created. With the removal of the Highway 101 bike/ped overcrossing, pedestrians and cyclists will have no other local option to cross the freeway other than Wornum Drive. Street design has significant effects on the social cohesion of neighborhoods and studies have repeatedly shown that people, particularly children, are less likely to walk or bike when there is a real or perceived safety issue along a given route. Without provisions for a safe and separated-from-traffic bicycle/pedestrian facility to cross Highway 101, the proposed project will become, for many, an effective barrier to walking and bicycling, both physically *and* psychologically.

The Mitigated Environmental Declaration states that the project will improve community cohesion through the installation of bicycle and ADA-complaint pedestrian improvements on Wornum Drive, which will provide a net benefit by increasing connectivity to transit, recreation areas and regional trails. As stated above, without a grade-separated crossing of Highway 101, Wornum Drive will not provide a safer environment for cyclists and pedestrians attempting to cross Highway 101.

Because of multiple conflict points and congestion and thus, decreased safety, Wornum Drive will serve as a barrier between communities located on both sides of the freeway, including access to residences, commercial centers and schools, access to public transit (including the Larkspur Ferry, the future SMART Station and the Marin Airporter), and access to popular recreational pathways and areas (including the Sandra Marker Trail, the Bay Trail, the Corte Madera Marsh Ecological Preserve and the Cal Park Tunnel).

Additionally, this area represents a critical link in Marin's North-South Greenway, extending from the Golden Gate Bridge through northern Novato; this mostly separated-from-cars facility serves to increase walking and biking mode shift in Marin (Marin's Countywide Plan has a goal of 20% walking and biking by 2020). A safe and separate-from-traffic Highway 101 bike/ped overcrossing is a vital link of this critically important Marin County facility. The existing bike/ped overcrossing must be replaced as part of this project to maintain this linkage.

2.2 Human Environment

2.2.1 Land Use

2.2.1.1 Existing and Future Land Use

This section fails to capture all future or planned developments within the corridor. Current and planned projects that were not identified in this section and in Table 2.2-1 include the future SMART Station, the Paradise Drive Elementary School, the Madera Vista Apartments renovation of 126 currently vacant units, the Central Marin Ferry Connection Project, and renovations to College of Marin. In addition, higher density development is being suggested or considered for San Quentin, Drakes Landing and Fifer Avenue. Therefore, for the Mitigated Negative Declaration to state that the vicinity is "built out" is inaccurate, as plenty of opportunity still exists for future development and higher density in the area.

The implications regarding such potential growth for future demand of walking and biking in this area are significant and must be evaluated. Without safe and separated facilities to cross Highway 101, opportunities for active transportation in the area will be reduced or lost. This vicinity is a growing transit oriented development area and safe and separated facilities are

vital for encouraging access to the SMART Train, the Larkpur Ferry, and nonmotorized transportation via the Cal Park Tunnel to destinations to the North.

Environmental Consequences
The determination that the proposed project will improve local access for the existing community serving commercial and residential land uses is incorrect when considering the removal of the Highway 101 bike/ped overcrossing. See comments regarding Wornum Drive and the planned removal (without replacement) of the existing pedestrian overcrossing of Highway 101 under Sections 2.1 and 2.2.1 above.

Tables 2.2-2 through 2.2-4 provide a summary of the goals and policies that are applicable to the proposed Build Alternative improvements. The Mitigated Negative Declaration indicates that the proposed project is consistent with such goals and policies. MCBC believes this is inaccurate based on the following:

Bicycle and Pedestrian Master Plans
While this section discusses the background and purpose of the Marin County, the City of Larkspur, and the Town of Corte Madera Bicycle and Pedestrian Plans, it does not include any analysis as to how the Greenbrae Corridor Improvement Project relates to or complies with those plans. Please include an analysis of how these plans relate to improvements proposed as part of the Greenbrae Corridor Improvement Project.

Table 2.2-2: Consistency with Marin Countywide Plan
Countywide Goal: *Less Traffic Congestion.* *Marin community members will have access to flexible work schedules, carpools, and additional transportation choices for pedestrians, bicyclists, and transit users that reduce traffic congestion.*

As was noted in Sections 2.1 and 2.2.1 above, the proposed project will have severe negative effects on cyclists and pedestrians needing to cross Highway 101. Given the proposed removal of the Highway 101 pedestrian overcrossing, without replacement, cyclists/pedestrians will be forced to cross the freeway using Wornum Drive. As stated in more detail above, Wornum Drive presents numerous safety concerns to non-motorized users. As such, the project will serve as a deterrent to nonmotorized users and will result in fewer transportation options for pedestrians and bicyclists than currently exists with the safe and separate Highway 101 bike/ped overcrossing. Cyclists and pedestrians will not use the planned facilities if they do not feel safe doing so. Therefore, any potential for reduction of traffic congestion that could be achieved through the provision of safe and separate bicycle and pedestrian facilities is lost under the current design)which has no such Highway 101 separated crossing replacement planned).

Policy TR-2.1: Improve the Bicycle and Pedestrian Network. *Promote adequate bicycle and pedestrian links, to the extent feasible, throughout the county, including streetscape improvements and standards that are safe and pedestrian and bicycle friendly.*

As stated in more detail in Section 2.1 above, Wornum Drive presents numerous safety concerns to non-motorized users. Furthermore, as also stated in Section 2.1 above, Wornum Drive will serve as an effective barrier between communities located on both sides of the freeway, including access to residences, commercial centers and schools, access to public transit (including the Larkspur Ferry Terminal, the future SMART Station and the Marin

Airporter), and access to popular recreational pathways and areas (including the Sandra Marker Trail, the Bay Trail and the Corte Madera Marsh Ecological Preserve). Additionally, this area represents a critical link in Marin's North-South Greenway which connects Sausalito to Novato.

Table 2.2-3: Consistency with the Town of Corte Madera General Plan
Policy RCS-2.5: ***Minimize transportation-related energy consumption.***
As stated in more detail above, Wornum Drive presents numerous safety concerns to non-motorized users. As such, the project will serve as a deterrent to non-motorized users and will result in fewer transportation trips by pedestrians and bicyclists than currently would be taken with the existence of the safe and separated from traffic pedestrian overcrossing. Cyclists and pedestrians will not use the planned facilities if they do not feel safe doing so. Therefore, any potential for the minimization of transportation-related energy consumption that could be achieved through the provision of safe and separate bicycle and pedestrian facilities will be reduced or lost under the current design.

Policy CIR-1.1: ***Provide safe and convenient linkages between all modes of travel within the planning area, and extending between the Town and adjacent jurisdictions in the region.***
As stated in Section 2.1 above, Wornum Drive will not provide a safe environment for cyclists and pedestrians attempting to cross Highway 101. Wornum Drive will serve as an effective barrier for many people walking and biking between communities located on both sides of the freeway, including access to residences, commercial centers and schools, and access to public transit. Additionally, this area represents a critical link in Marin's North-South Greenway, Marin's primary North/South facility extending from Sausalito through northern Novato. The North/South Greenway provides direct linkages to/from the Sandra Marker Trail, Larkspur Ferry Terminal, Central Marin Ferry Connection, the Cal Park Tunnel, the future Larkspur SMART Station and to communities beyond.

Policy CIR-2.1: ***Prioritize options for improving bicycle and pedestrian access across Highway 101.***
In order to prioritize options for improving bicycle and pedestrian access across Highway 101, facilities must be constructed that are considered safe and appealing to use. The current facilities planned along Wornun Drive, without a replacement grade-separated crossing of Highway 101, will not achieve that goal. The proposed design of Wornum Drive is projected to result in a significant increase of automobile traffic using the facility, as well as the addition of multiple on/off-ramps that cyclists and pedestrians will be forced to navigate across when attempting to cross the freeway. Cyclists and pedestrians will be forced to cross numerous lanes of heavy traffic, including some double right turn lanes. Right turn lanes, particularly double right turn lanes, present a well known danger to pedestrians and cyclists. There is overwhelming evidence that street design and traffic affects the physical and mental health of residents and social cohesion of street neighborhoods. Without provision of a safe and separated-from-traffic bicycle/pedestrian facility for crossing Highway 101, the proposed project will become an effective barrier for many people to bicycling, both physically *and* psychologically for those wishing to cross the freeway.

Policy CIR-3.1: ***Increase the Town's network of bicycle and pedestrian paths, especially Class I facilities, as viable alternatives to vehicular transportation, especially for access to neighborhoods, commercial centers, schools, parks and other key activity centers.***

For greater detail, refer to comments on Policies CIR- 1.1. Wornum Drive will serve as an effective barrier for many users between communities located on both sides of the freeway, including access to residences, commercial centers and schools, and access to public transit.

Policy CIR-3.3: ***Explore opportunities to install bicycle and pedestrian paths that provide connections to surrounding communities and regional open spaces.***
Please refer to comments on Policy CIR- 1.1 and CIR-3.1.

Table 2.2-4: Consistency with the City of Larkspur General Plan
Goal 10: ***Create better ties between Larkspur, neighboring communities, and the region.***
Please refer to comments on Policy CIR- 1.1 and CIR-3.1.

Policy a: ***Develop a comprehensive and coordinated trails and paths system that serves both recreational and utilitarian travel.***
Please refer to comments on Policy CIR- 1.1 and CIR-3.1.

Policy f: ***Freeway improvements should include protected crossings for pedestrians and bicycles.***
Refer to comments on Policy CIR- 1.1 and CIR-3.1. In order to prioritize options for improving bicycle and pedestrian access across Highway 101, facilities must be constructed that are considered safe and appealing to use. The current facilities planned along Wornun Drive will not achieve that goal. The proposed design of Wornum Drive is projected to result in significant increases of automobile traffic using the facility, as well as the addition of multiple on/off-ramps that cyclists and pedestrians will be forced to navigate when attempting to cross the freeway. Cyclists and pedestrians will be forced to cross numerous lanes of heavy traffic, including some double right turn lanes (see comments above re: right turn lanes). There is overwhelming evidence that street design and traffic affects the physical and mental health of residents and social cohesion of street neighborhoods. Studies have repeatedly shown that that people, particularly children, are less likely to bike or walk when there is a busy road barrier en route or when facilities are perceived to be unsafe. Without provision for a safe and separated-from-traffic bicycle/pedestrian facility for crossing Highway 101, the proposed project will become an effective physical barrier for many users that would otherwise walk and bike across Highway 101.

Goal 6: ***Provide paths that encourage broad public use.***
In order to encourage broad public use of the pathway facilities proposed along Wornum Drive, they must be considered safe and appealing to use. See Policy F comment above.

Environmental Consequences
The Build Alternative is **not** consistent with the Marin Countywide Plan, the Town of Corte Madera General Plan, and the City of Larkspur General Plan, as discussed under Tables 2.2-2 through 2.2-4 Policies and Goals above.

No-Build Alternative
A heavily used Highway 101 bike/ped overcrossing does **not** "*hinder the overall effectiveness of the multi-modal options in the corridor*," as this section indicates. The Highway 101 bike/ped overcrossing, in fact, does quite the opposite. It enhances connectivity by providing a safe and separate facility over Highway 101. The removal of the existing Highway 101 bike/ped

overcrossing, with no plans for replacement, however, *does* hinder the overall effectiveness of the multi-modal options in the corridor.

Avoidance, Minimization, and/or Mitigation Measures
As noted above under Environmental Consequences, the proposed Build Alternative improvements are **not** consistent with local planning goals and policies, specifically as they relate to improved access to alternative modes of transportation, including pedestrian access. Therefore, the Mitigated Negative Declaration's determination that "*no minimization or mitigation measures are required for transportation land use*" is incorrect. It is vital that mitigation measures include a new safe and separated from traffic, ADA compliant, crossing of Highway 101 as part of the project to mitigate the numerous safety, circulation and connectivity concerns discussed in detail above, and to ensure compliance with local plans' polices and goals, also noted above.

2.2.1.3 Parks and Recreational Facilities
Affected Environment
Bikeways
The second paragraph under "Bikeways" indicates that, "*the limited connectivity of the existing multi-use paths and bikeways is further confined by the existing pedestrian overcrossing at Nellen Avenue, which currently does not comply with the standards of the Americans with Disabilities Act (ADA).* This sentence should (similar to the above comment, under "***1.2.2.3 Modal Interrelationships and System Linkages"***), should be removed. The rationale that because the Highway 101 bike/ped overcrossing is not ADA-compliant it therefore confines travel is incorrect. The Highway 101 bike/ped overcrossing provides important connectivity in the area for cyclists, for the elderly, for disabled and for the very young. The planned use of Wornum Drive in place of the existing overcrossing will not only create significantly greater dangers for users, but it will create an impediment and disincentive for people wishing to cross the freeway by bicycle or walking. MCBC is strongly recommending that this overcrossing structure be replaced with an ADA-compliant grade-separated structure.

Bay Trail Alignment
It has long been a MCBC intention to complete the North/South Greenway adjacent to this project area along the current SMART ROW (over Corte Madera Creek and to the south to Wornum Drive) for both transportation and recreation purposes. MCBC has long supported a separated bridge over Corte Madera Creek and a north/south pathway on the SMART right-of-way from Corte Madera Creek to Wornum Drive.

MCBC also supports the construction of a 12-foot wide bicycle/pedestrian pathway using the "bent caps" on the Northbound Sir Francis Drake Boulevard exit ramp that is planned as part of this project. MCBC supports San Francisco Bay Trail comments, as submitted on February 13th, 2013, which support the Central Marin Ferry Connection Project study Alternative 1C. This alternative provides a separated bike/ped facility over Corte Madera Creek using the bent caps and continuing through the (first) mobile home park after touching down onto Redwood Highway (when heading south). The route then continues along the SMART railroad corridor heading south to Wornum at Redwood Highway. Because the GCIP is planning on constructing the path on the bent caps as part of this project, it seems prudent to pursue Alternative 1C in the near term. The GCIP provides a unique opportunity to move this part of Phase 2 of the Central Marin Ferry Connection Project forward and there is significant historic, current, public and agency support for this effort. While it is clear that this option was

previously removed from consideration as part of this project, it warrants another assessment and should be included as the GCIP moves forward.

Avoidance, Minimization, and/or Mitigation Measures
MCBC appreciates the intention to "maintain bicycle and pedestrian access to the maximum extent feasible as part of construction staging". MCBC further requests that bike/ped facilities be prioritized in the project construction schedule to the extent feasible as well. Many of these facilities can be built before or concurrently with other larger construction activities and MCBC requests that these facilities be prioritized in the construction schedule.

2.2.2 Growth
This section neglects to look at the implication of growth on nonmotorized transportation in the project area. Increases of housing in both the City of Larkspur and the Town of Corte Madera (especially considering that there will likely be significant growth in the project area) will increase the amount of people walking and biking in the area. This is especially true when considering the likelihood that many new residents at locations such as the new WinCup development, the Rose Garden Development and potential future development of the Jackovics' properties (Big 5 and adjacent properties), will be living within walking/biking distance from the future SMART Station, the Larkpur Ferry and destinations to the north through the Cal Park Tunnel (see comments above for section *2.2.1.1 Existing and Future Land Use* for additional information regarding future active transportation development impacts to the area).

Additionally, is it important to recognize that walking and biking rates are growing in Marin at a rate far higher than the national average. The 2011 Nonmotorized Transportation Pilot Program bike counts for Marin indicate that, "bicycling increased 90% on weekends and 59% on weekdays, while walking increased 39% on weekends and 35% on weekdays between 2007 and 2011." At 12 Marin locations bicycling levels in 2011 are 159% higher on weekends and 172% higher on weekdays than they were in 1999. On the Larkspur Corte Madera pathway, bicycle counts in 2011 were 35% higher on weekends and 143% on weekdays than in 2007. Driving this growth is the significant increase of safe and separated facilities on the North/South Greenway, including the Cal Park Tunnel, the Lincoln Hill Pathway and the (soon to be built) Central Marin Ferry Connection Project, all of which are part of the North/South Greenway network that includes the Sandra Marker Trail in Larkspur/Corte Madera to the south.

It is vital that bike/ped accommodations in this area recognize what is expected to be continued growth of walking and biking and the increasing need for a safe crossing of Highway 101 on a separated facility. Forcing all bike/ped traffic onto Wornum Drive which is projected to have a substantial increase of cars by 2035, will create unnecessary dangers for cyclists and pedestrians and will create a serious disincentive for cyclists and pedestrians traveling between Marin's major transportation hub at Larkspur Landing and local communities.

2.2.3.2 Environmental Justice
Low income communities throughout the Country suffer from inadequate bike/ped facilities disproportionately. While this document indicates that this project will not displace minority or low-income residents, the lack of a safe and separated bike/ped facility crossing Highway 101 may disproportionately affect these groups. Low-income residents disproportionally walk and bike because of their inability to afford owning and operating cars. As such, these non-drivers

will be forced to use Wornum Drive in the absence of the existing 101 overcrossing and will experience significantly more dangerous conditions. These dangers will also disproportionally affect the elderly. Having safe and separate facilities, on the other hand, will significantly benefit low-income users of this transportation corridor; this environmental justice issue must be evaluated as part of this document.

2.2.5 Traffic and Transportation

2.2.5.1 Regulatory Setting

This project fails to meet regulatory direction as assigned by the FHWA. Full consideration has not "*been given to the safe accommodation of pedestrian and bicyclists*" in the development of this project with respect to crossing Highway 101. The removal of a safe and separate-from-traffic Highway 101 overcrossing, only to be replaced with the Wornum Drive undercrossing, fails to meet the direction assigned by the FHWA. While the new Wornum Drive facilities are planned to be ADA compliant, they present particular dangers for the elderly and disabled as the crossing Wornum Drive crossing will create a significantly greater number of conflict points with cars. Section 2.2.5.1 says, "*When current or anticipated pedestrian and/or bicycle traffic presents a potential conflict with motor vehicle traffic, every effort must be made to minimize the detrimental effects on all highway users who share the facility*." Every effort has unquestionably **not** been made to minimize potential conflicts. Minimizing potential conflict is best done with a grade-separated crossing of Highway 101. Wornum Drive (without an overcrossing replacement) will create *more*, not fewer, dangers for those crossing Highway 101.

The following paragraph is inaccurate: "*As shown in **Figure 2-2**, existing and planned bicycle and pedestrian facilities lack connectivity within the Greenbrae/Twin Cities Corridor. For example, there is no connection between the planned Central Marin Ferry Connection Multi-Use Pathway and the Cal Park Hill Tunnel to the north, and existing pedestrian and bicycle facilities to the south. This gap creates poor linkages between alternative modes (pedestrian, bicycle, transit and ferry service) hindering the overall effectiveness of the multi-modal options present in the corridor. **This situation is further exacerbated by the existing non-ADA compliant pedestrian overcrossing at Nellen Avenue."***

It is true that connectivity will be greatly increased by constructing a pathway on the bent caps over Corte Madera Creek. However, the statements that the existing pedestrian overcrossing "creates poor linkages" and hinders "the overall effectiveness" and "exacerbates" the situation is false. This paragraph above should be modified by removing the sentence that is in bold text.

The existing pedestrian overcrossing is a significant and popular connector over Highway 101 and serves many people of all ages, despite being non-ADA compliant. A new ADA compliant grade-separated crossing across Highway 101 would be of great benefit for connectivity across Highway 101 and it would serve the needs of all users traveling to and from separated facilities to the south/west. MCBC urges that a new grade-separated crossing be included as part of this project.

Intersection Traffic Operations

The study of Southbound 101 and Northbound 101 intersection operating conditions for the year 2015 under both the Build and No-Build Alternatives should include an assessment of the Pedestrian Level of Service at the study intersections. Many of these intersections represent

typical routes pedestrians and bicyclists use to access nearby public transit, parks, schools, essential goods, and surrounding neighborhoods. Overall, existing conditions at the project area suggest substantial traffic hazards for pedestrians and bicyclists, both for area residents walking and bicycling to adjacent neighborhood amenities and for people coming to the project area via non-motorized means. Application of a Pedestrian Environmental Quality Index (PEQI), originally developed by the San Francisco Department of Public Health (SFDPH) in 2008 and now used nationwide, should be included as part of the study of intersection operating conditions.

The Initial Study should evaluate existing conditions for pedestrian and bicycle safety and the cumulative effects on pedestrian and bicycle hazards and collision frequencies in the project area. The PEQI should quantify street and intersection factors empirically known to affect people's travel behaviors and be organized into the typical five categories: intersection safety, traffic, street design, land use and perceived safety. Within these categories should be 31 indicators that reflect the quality of the built environment for pedestrians which should comprise the survey used for data collection. SFDPH has aggregated these indicators to create a weighted summary index, which can be reported as an overall index. Table 1 indicates how the indicators fit into the broader domains of pedestrian comfort and security.

Table 1: PEQI 2.0 Indicators by Domain

Intersection Safety	Traffic Volume	Street Design	Land Use	Perceived Safety
▪ Crosswalks ▪ High visibility crosswalk ▪ Intersection lighting ▪ Traffic control ▪ Pedestrian/ Countdown signal ▪ Wait time ▪ Crossing speed ▪ Pedestrian refuge island ▪ Curb ramps ▪ Intersection traffic calming features ▪ Pedestrian engineering countermeasures	▪ Number of vehicle lanes ▪ Posted speed limit ▪ Traffic volume ▪ Street traffic calming features	▪ Continuous sidewalk ▪ Width of sidewalk ▪ Width of throughway ▪ Large sidewalk obstructions ▪ Sidewalk impediments ▪ Trees ▪ Driveway cuts ▪ Presence of a buffer ▪ Planters/ gardens	▪Public seating ▪ Public art/ historic sites ▪ Retail use and public places	▪ Pedestrian scale lighting ▪ Illegal graffiti ▪ Litter ▪ Empty spaces

The increased traffic along Wornum Drive will further increase hazards to pedestrians and cyclists. The SFDPH's peer reviewed research documents that small area-level differences in vehicle-pedestrian injury collisions are dependent on resident and employee population, neighborhood commercial uses, high traffic volumes and arterial street types. Without mitigations, the increased population within the project area would be subject to these hazards and therefore increased risk of injury and death while walking or biking on Wornum Drive.

The discussion of baseline conditions should include data on pedestrian-vehicle collisions in the project area. In addition to assessing where new resident populations will be introduced and their potential pedestrian routes, providing a map of the location of pedestrian-vehicle collisions in the project area over the past 10 years would be helpful in identifying high hazard locations that could benefit from focused pedestrian design efforts. The Initial Study should also consider how improvements in the pedestrian environment in the area may be feasible and provide appropriate mitigations, including the replacement of a grade-separated crossing of Highway 101.

2.2.6 Visual/Aesthetics
2.2.6.2 Affected Environment
Marin Countywide Plan
Design–Goal DES-5: ***Attractive and Functional Streets and Parking Areas. Design automobile use areas to fit the character of the community and comfortably accommodate travel by pedestrians and bicyclists, while still meeting health, safety, and emergency access needs.***
Refer to comments on Policy CIR- 1.1 and CIR-3.1.

City of Larkspur General Plan
Community Character–Policy B: ***Preserve the desirable features of the built environment as well as the remaining natural environment - trees, marshes, creeks, hillsides - as components of Larkspur's community character and identity.***
The existing bike/ped overcrossing of Highway 101 represents a desirable community feature that is proposed for removal, without replacement, as part of the proposed project. The removal of this desirable feature of the built environment is in direct violation of Policy B above.

2.2.6.4 Avoidance, Minimization, and/or Mitigation Measures
The Mitigated Negative Declaration's determination that the local character of Lucky Drive, Wornum Drive and recreation trails will be maintained and made more appealing to pedestrians is incorrect. The removal of the existing pedestrian overcrossing near Lucky Drive and the subsequent rerouting of all pedestrian and bicycle traffic to Wornum Drive will result in a vast negative effect on cyclists and pedestrians needing to cross Highway 101. The facilities proposed along Wornum drive, as opposed to the existing grade-separated crossing of Highway 101, are **not** appealing to cyclists and pedestrians for the numerous safety and accessibility concerns discussed above. Without provision of a safe and separated-from-traffic bicycle/pedestrian crossing of Highway 101, the proposed project will become a barrier to bicycling, both physically ***and*** visually/psychologically for those wishing to cross the freeway.

2.6 Climate Change (CEQA)
2.6.2 Project Analysis
The Mitigated Negative Declaration's determination that the proposed project is designed to improve traffic operations, reduce traffic congestion, and improve bicycle and pedestrian access along U.S. Highway 101 is incorrect. The proposed removal of the pedestrian overcrossing of Highway 101, without replacement, and the bicycle and pedestrian improvements proposed along Wornum Drive will **not** help to alleviate traffic congestion, enhance local traffic circulation, or provide interregional connectivity when viewed from a non-motorized transportation perspective.

The removal of the existing overcrossing, without replacement, will result in a degradation of existing and planned pedestrian and bicycle facilities to the north and existing pedestrian and bicycle facilities to the south, and will effectively create a gap in these facilities along the US 101 corridor and Marin's North/South Greenway/bikeway. Facilitating a safe and separate from traffic connection to these transit alternatives and popular destinations would serve to reduce the number of personal vehicles on the highway and connecting arterials, thereby reducing the amount of GHG emissions.

As noted in the Mitigated Negative Declaration, "the U.S. EPA estimates that an individual who leaves their car at home for just two days a week will reduce GHG emissions by an average

1,600 pounds per year." Therefore, it's imperative that the bicycle/pedestrian facilities constructed as part of the proposed project serve to entice (verses discourage) people to bike or walk to their destinations. Under the current project design, the proposed project presents numerous safety and circulation concerns to cyclists and pedestrians. The facilities proposed along Wornum drive, as opposed to the existing safe and separate from traffic crossing of Highway 101, are **not** appealing to cyclists and pedestrians as a result of the numerous safety and accessibility concerns discussed above. Without provision of a safe and separated-from-traffic bicycle/pedestrian facility for crossing Highway 101, the proposed project will (for many) become a barrier to walking and bicycling, both physically ***and*** psychologically and will result in fewer people walking and biking to their destinations, and therefore, the project will result in an increase of GHG emissions.

Thank you.

Sincerely,

Andy Peri, Advocacy Director
Marin County Bicycle Coalition

Alisha Oloughlin, Planning Director
Marin County Bicycle Coalition

www.marinbike.org

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F 415 456 9344
733 Center Blvd.
Fairfax, CA 94930

Attachment A

Below please find a petition and over 1150 petition signers supporting the replacement of the existing Greenbrae bicycle/pedestrian overcrossing with a safe and separated-from-traffic facility. The names below listed as “anonymous” signed the petition with their actual names but asked for their names not to appear in public documents.

Petition to the Transportation Authority of Marin (TAM):

We the undersigned urge the Transportation Authority of Marin to prioritize safety for cyclists and pedestrians and include a replacement overcrossing as part of the design, final environmental document, funding and construction plan for the $142 million Greenbrae/Twin Cities Corridor Improvement Project for the following reasons:

Safety

- Marin must continue to build transportation infrastructure that accommodates people of all ages and abilities. Requiring young children, the disabled and the elderly to cross multiple surface streets as well as freeway onramps and offramps in order to get across Highway 101 is unacceptably unsafe.
- This project must encourage nonmotorized travel by building a separated-from-cars overcrossing. The new planned facilities on Wornum Drive will discourage nonmotorized travel in the area.

Environment and Equity

- Over 62% of greenhouse gas emissions come from transportation in Marin. Facilities that encourage nonmotorized transportation are a key part of the GHG solution.
- Only a safe and separate facility will provide equitable safe transportation routes for the disabled, poor and the elderly who cannot afford or are not able to drive.

Existing Plans/Policies

- Marin County's Countywide plan has a stated goal of 20% walking and bicycling by the year 2020. Failure to replace this overcrossing is inconsistent with that goal.
- The Corte Madera General Plan has a policy to prioritize options for improving bicycle and pedestrian access across Highway 101- this project fails regarding this policy.

- The Larkspur General Plan includes policies prohibiting thoroughfares that divide the city and requires design circulation facilities that minimize disruption of neighborhoods and communities. It includes a goal to encourage attractive alternatives to the use of single-occupant automobiles- this project fails regarding these policies.

Encouragement, Health, Active Lifestyle/Active Transportation

- Marin has seen a weekday increase of 172% of cycling since 1999- and walking increased 39% on weekends and 35% on weekdays between 2007 and 2011. This trend will only continue with the replacement of safe and separated bike/ped facilities.
- Marin has the oldest population in the Bay Area; having safe and separate bike/ped facilities are critical for the elderly to maintain independence.
- It is vital that we work to reverse the obesity epidemic that has swept the nation; the built environment is a key part of the solution.

Connectivity and the Future

- Replacing the overcrossing would connect Corte Madera and west Larkspur residents to the ferry and SMART train at Marin's most important transportation hub at Larkspur Landing.
- The overcrossing is a vital safe connector in Marin's bike/ped North-South Greenway.
- A new overcrossing is a 50-100 year investment for existing and future generations- we need to be thinking about our children, our grandchildren, our great grandchildren and beyond.

Elinore	Alaria	Sausalito
Andrew	Abballo	Fairfax
Adrienne	Abbott	Sunnyvale
Bill	Abright	San Anselmo
Cathleen	Acheritogaray	Corte Madera
Elise	Acosta	Sausalito
Susan	Adams	Sausalito
Rick	Addis	Greenbrae
Elliot Akwai-Scott		Portland
Larry	Alboher	Mill Valley
Mark	Alicino	Fairfax
Christy	Allen	Mill Valley
Michael	Alley	Mill Valley
Steven	Alter	Larksur
Emily	Alter	Larkspur
Richard	Alvarado	Larkspur
Alan	Ament	San Rafael
John	Anastasio	Sausalito
Robert	Ander	Larspur
Terrell	Anderson	San Rafael
Peter	Anderson	Fairfax
Frank	Anderson	Santa Rosa
Jack	Androvich	San Rafael
Erin	Aradi	San Rafael
Daniel	Archer	Mill Valley
Dana	Armanino	Larkspur
Loretta	Armstrong	Greenbrae
Raul	Atkinson	San Anselmo
John	August	Mill Valley
Renee	Avalos	Mill Valley
Mike	Bacce	Novato
Mariela	Badum	Larkspur
Kim	Baenisch	San Rafael
Brian	Baker	San Anselmo
Randi	Bakken	Novato
Derek	Ball	Corte Madera
Magnus	Barber	San Francisco
Laura	Barber	Corte Madera
Charles	Barrett	Mill Valley
Arthur	Barton	Tiburon
John	Battelle	Ross
Morris	Beazley	San Anselmo
Barbara	Becker	Corte Madera
Cynthia	Beckwith	Larkspur
Matthias	Behrends	Mill Valley
Bruce	Bell	Sausalito
Nina	Bellak	Bolinas
William	Bennett	Larkspur
Anna	Berczi	San Francisco
Steven	Berger	San Rafael
Piper	Berger	Tiburon
Claudia	Berger	Greenbrae
Mauricio	Bernales	Novato
Gregory	Bernson	Fairfax
Liz	Bernstein	Mill Valley
Peter	Berridge	San Rafael
Erick	Bet	San Anselmo
Ellie	Beyers	San Francisco
Sandra	Bird	Kentfield
Mark	Birnbaum	Novato
Leslie	Blackaller	Kentfield
Ben	Blizard	Oakland
Leslie	Bloom	Mill Valley
Fredi	Bloom	Fairfax
Thomas	Blower	Tiburon
Jason	Blum	Larkspur
Layla	Bockhorst	Larkspur
James	Bockhorst	Larkspur
John	Boeschen	San Rafael
Barbara	Bogard	Mill Valley
Ben	Bogin	Larkspur
Camille	Bohanan	Novato
Charles	Bookoff	Woodacre
Patricia	Borden	Larkspur
Tom	Boss	Forest Knolls
Emily	Botts	Corte Madera
Casey	Botts	Fairfax
Gerard	Bourguignon	Mill Valley
Meade	Boutwell	San Anselmo
Nancy	Boyce	San Rafael
N Edward	Boyce	San Rafael
Nessa	Brady	Mill Valley
Larry	Bragman	Fairfax
Matthew	Brasler	San Anselmo
Dave	Brast	Inverness
Dave	Brast	Inverness
Ruth	Braun	Larkspur
Connie	Breeze	Fairfax
John	Brentlinger	Fairfax
Sarah	Brewer	San Rafael
N.	Brink	Mill Valley
Claudia	Brisson	San Rafael
Jeff	Broussard	Corte Madera
Amanda	Brown	Mill Valley
Pamela	Bryan	Larksspur
Stephen	Bryne	Fairfax
Stephen	Bryne	Fairfax
David	Buccolo	Kentfield
Randal	Buck	San Rafael
Clifton Buck-Kauffman		Cotati
Lee	Buckner	San Rafael
Christopher	Budz	San Francisco
Robert	Bundy	Corte Madera
Terence	Bunton	Mill Valley
Marlene	Buono	Corte Madera
Pat	Burke	Kentfield
Alex	Burnham	San Rafael
Debora	Busse	Larkspur
Claire	C	Stinson Beach
Cynthia	Cady	Woodacre
Jerry	Cahill	Mill Valley
Clarence	Cain	Fairfax
Karlene	Caldwell	San Anselmo
Alex	Caldwell	Fairfax
Patricia	Callahan	Kentfield
Florette	Camarata	Sausalito
Diane	Camargo	Sacramento
Ann	Cameron	Corte Madera
Ray	Capper	Corte Madera
Joey	Carlin	Greenbrae
Kay	Cash-Smith	Tiburon
Mike	Cass	Novato
David	Catania	Mill Valley
Marx	Cazanave	Kentfield
Matt	Celli	San Rafael
Shelley	Champine	Ca
Susanne	Chaney	Fairfax
Tiffany	Chang	Larkspur
Robert	Chang	Tiburon
Rose	Chavira	San Rafael
Wm Carey	Chenoweth	Sausalito
Shelley	Chesley	Mill Valley
Edward	Chin	San Rafael
Chris	Chin	Avedouglaston
Lisa	Chipkin	San Rafael
Shana	Chrisman	San Rafael
Robert	Chrisman	San Rafael
Mark	Christian	San Anselmo
Leif	Christiansen	Corte Madera
Lori	Chudacoff	San Anselmo
Chris	Churchill	Cortemadera
Dan	Ciccarone	Mill Valley
Lorenzo	Cico	San Anselmo
Tom	Ciemins	Larkspur
Peggy	Clark	Mill Valley
Bridget	Clark	San Anselmo
Shelagh	Claw	Sausalito
Carolyn	Clute	San Francisco
Chris	Clutton	Fort Bragg
Rick	Coates	Cazadero
Trystan	Cobbett	San Francisco
Nathan	Cohen	Larkspur
Leah	Cohen	Larkspur
Jay	Cohen	Belvedere
Joyce Colenbrander		Novato
Ezra	Colman	Novato
Mark	Comin	San Rafael
Loring	Conant	Larkspur
Jano	Contador	San Francisco
Mark	Cook	Greenbrae
Tim	Cooper	Corte Madera
Henry	Corning	Corte Madera
Glenda	Corning	Corte Madera
Craig	Coss	Sausalito
Chris	Costello	Petaluma
Bryan	Costello	Larkspur
Robert	Cotton	San Rafael
John	Counter	Mill Valley
Cynthia	Countouris	Greenbrae
Steven	Courteau	Back Cottage
Claudia	Coury	Corte Madera
Anne	Coyne	San Rafael
Tara	Coyote	San Anselmo
Arien	Crellin-Quicj	Greenbrae
Marian	Cremin	Woodacre
James	Cressa	San Anselmo
Todd	Crisafulli	San Rafael
Dennis	Crowe	San Rafael
Thomas	Crowell	San Anselmo
Katheirne	Csizmadia	San Anselmmo
Bob	Cullinan	San Rafael
Mark	Cummings	San Rafael
Angela And Art Curley		Larkspur
Jon	Curtis	San Rafael
Michael	Dab	Tiburon
Lya	Daggett	Sacramento
Mark	Danzig	Millvalley
Paul	Daro	Mill Valley
Paul	Daro	Mill Valley
Ron	Davenport	Novato
Stephanie	Davis	Larkspur
Neil	Davis	Ukiah
Lori	Davis	San Rafael
John	Davis	Corte Madera
Jim	De La Riva	Foster City
Vicky	Dehnert	Mill Valley
Christina	Del Villar	Newark
Joe	Demaestri	Mill Valley
Bill	Denler	Larkspur
Stan Dennison Jr.		Walnut Creek
Jane	Denton	San Rafael
Timothy	Dick	Palo Alto
Katherine	Dicker	Sunnyvale
Josh	Dieterich	San Rafael
Michael	Dinga	Novato
Christopher	Disalvio	Mill Valley
Susan	Dixon	Novato
Donald	Dodge	San Francisco
Frederick	Dodsworth	Mill Valley
Ellen	Donald	San Anselmo
Matt	Donlan	San Rafael
Diana Donlon Karlenzig		San Anslmo
Yarrow	Drake	San Anselmo
Caroline	Drake	San Anselmo
Nic	Drexler	San Anselmo
Nic	Drexler	Larkspur
Helene	Drumm	San Anslemo
Stephen	Ducat	Fairfax
Michael	Dudasko	San Rafael
Deborah	Duenas	Fairfax
John	Dugan	Berkeley
Fred	Dupuis	Greenbrae
Maureen	Durnell	San Anselmo
Blake	Durtsche	San Francisco
Steve	Eagleton	San Anselmo
Stephen	Eckdish	Mill Valley
David Edmondson		Washington DC
Harry	Elefther	San Anselmo
Naomi	Elvove	Greenbrae
Mary	Estes	San Rafael
Jennie	Eubank	Inverness
Carla	Falkner	Berkeley
Hans	Fallant	Mill Valley
Pamela	Farrell	Tiburon
Andrew	Farrell	Corte Madera
John	Ferguson	Fairfax
Jeanie	Fidler	Novato
Mark	Fiore	Fairfax
Diane	Fischler	San Rafael
Stella	Fisher	Ross

Fredreick	Fisk	San Anselmo
Rick	Fister	Larkspur
Sinead	Fitzgerald	Greenbrae
Matthew	Fitzpatrick	Ross
Bradford	Flaharty	San Rafael
Yolanda	Fletcher	San Anselmo
Sherril	Flint	Greenbrae
Lee	Flint	Greenbrae
Kari	Floberg	San Francisco
Tom	Flynn	Larkspur
Kevin	Foley	Mill Valley
Virginia	Fong	San Rafael
Stacey	Ford	Greenbrae
Jeanne	Foreman	Larkspur
Kathleen	Forte	Tiburon
Carson	Forter	San Rafael
Charles	Fowler	Larkspur
Steve	Fox	Corte Madera
Rick	Fraites	Novato
Mike	Freeman	Santa Rosa
Norah	Frei	Larkspur
Linda	Frender	Larkspur
Gwendolyn	Froh	Fairfax
Bob	Frommer	San Rafael
Robert	Fuller	Fairfax
Jen	Fuller	Sausalito
Charlotte	Fuller	Fairfax
Janet	Furman	Corte Madera
Nancy	Gallagher	Larkspur
John	Gallagher	Larkspur
Rodrigo	Garcia	Mill Valley
Laura	Garcia	Fairfax
Greg	Garcia	Fairfax
Enzo	Garcia	Mill Valley
Elena	Garcia	Fairfax
Jon	Gardner	Mill Valley
Michael	Gaspers	San Rafael
Michael	Gassen	Mill Valley
Jim	Gault	Greenbrae
Paul	Gehrman	Larkspur
Rich	Gelber	San Francisco
Tricia	Gellman	Sausalit
Brett	Geoffroy	Mill Valley
Susan	George	San Francisco
Matthew	Geyer	Mill Valley
Marty	Giblas	Mill Valley
Marty	Giblas	Mill Valley
Jack	Giessler	Larkspur
Tim	Gilbert	San Rafael
Tim	Gilbert	San Rafael
Jeffrey	Gimzek	San Anselmo
Robert	Ginis	Corte Madera
Genevieve	Ginwala	Greenbrae
Bob	Glass	San Anselmo
David	Glazer	Mill Valley
John	Goggin	Mill Valley
Lindsey	Going	San Rafael
Aaron	Golbus	San Rafael
Stephen	Gold	San Rafael,
Ralph	Gonzales	Kentfield
Joyce	Gordon	Corte Madera
Arnold	Graf	Petaluma
Deborah	Graham	Mill Valley
Eric	Gratacap	San Francisco
Nina Anne	M.Greeley	Sausalito
John Greenwood		San Francisco
Molly	Gregg	Petaluma
Deborah	Greitzer	San Rafael
Richard	Grey	Corte Madera
Cathy	Grey	Corte Madera
David	Griffis	Mill Valley
Gary	Gross	San Anselmo
Nancy	Grover	San Anselmo
Deborah	Grund	San Rafael
Indira	Guerrieri	San Rafael
Sandra	Guldman	Kentfield
Ronald	Gutierrez	San Francisco
Otis	Guy	Fairfax
Noah	Guyot	Mill Valley
Manuel	Guzman	San Anselmo

Jerry	Haas	Mill Valley
Jana	Haehl	Corte Madera
Jeanette	Hall	Fairfax
Dean	Halpern	San Rafael
William	Hangen	Santa Cruz
David	Hannaford	San Anselmo
Johanna	Harman	Mill Valley
Patricia	Harrington	San Rafael
Charles	Harris	San Rafael
Steve Harshbarger		Corte Madera
Tom	Harvey	Corte Madera
Megan	Harvey	Corte Madera
Lori	Harvey	San Rafael
Chris	Hawkins	San Francisco
Rick	Hayman	Fairfax
Marcus	Hays	Sausalito
Linda	Hearne	Larkspur
Phil	Heiman	Penngrove
Erica	Heimberg	Woodacre
Bill	Helvestine	Larkspur
Ted	Herman	Petaluma
Tori	Hernandez	Larkspur
Jan	Herr	San Anselmo
Dana	Herrick	Sausalito
Daniel	Hersh	Mill Valley
Daniel	Herth, Jr.	Santa Rosa
Craig	Herzog	Mill Valley
Stephen	Hesson	San Rafael
Michael	Hill	San Leandro
Frances	Hinckley	Corte Madera
Joel	Hirigoyen	San Rafael
Katherine	Hoag	Fairfax
Christian	Hobbs	Corte Madera
Lucelle	Hoefnagels	San Anselmo
Lynn	Hoerle	Inverness
David	Hoffman	Fairfax
Peter	Hogg	Greenbrae
Helyse	Hollander	Larkspur
Victoria	Holman	San Geronimo
Matthew	Holt	Mill Valley
Ann	Holzheiser	Greenbrae
Ken	Homer	San Rafael
George	Hope	Inverness
Jeffery	Hopkins	Fairfield
Cammie	Howard	Longmont
Michael	Howe	San Geronion
Russell	Howson	Mill Valley
Roland	Hsu	Mill Valley
Chris	Hubbard	Mill Valley
Deb	Hubsmith	Fairfax
Eric	Hudson	Fairfax
Vernon	Huffman	Woodacre
Matt	Hughes	San Anselmo
Kimberly	Hughes	Mill Valley
Georgia	Hughes	Novato
Justin	Hult	San Rafael
Joe	Hunt	San Rafael
Sharon	Hunter	San Anselmo
Scot	Hunter	Ross
Brian	Hunwick	San Anselmo
Dan	Hurlbutt	San Rafael
Tim	Hurley	San Francisco
Ken	Husband	San Anselmo
Lisa	Hynes	Corte Madera
John	Ince	Mill Valley
Russ	Irwin	Sausalito
Jeff	Ivarson	San Rafael
Lorene	Jackson	San Rafael
Tad	Jacobs	San Rafael
Rodger	Jacobsen	San Rafael
Elmer	Jan	San Rafael
Martha	Jarocki	Greenbrae
Gerry	Jarocki	Greenbrae
Lucie	Jencek	Sausalito
Michael	Jenkins	Tiburon
Soren	Jensen	Mill Valley
Larry	Jobbins	Novato
Tyler	Johnson	Corte Madera
Markham	Johnson	Mill Valley
Donald	Johnson	Fairfax

Robert	Johnsons	Larkspur
Tom	Johnston	San Anselmo
Robert	Johnston	San Rafael
Jason	Jones	Fairfax
Adella	Jones	Larkspur
Katherine	Judd	Larkspur
Jack	Judkins	Fairfax
Clive	Julianus	Fairfax
Sven	Junkergard	San Anselmo
Alex	Kahl	San Rafael
Andrew	Kaiser	San Rafael
Devyani	Kamdar	Larkspur
Kay	Karchevski	San Rafael
Paul	Kardel	Kentfield
Warren	Karlenzig	San Anselmo
Ellen	Karpay-Brody	
	San Anselmo	
Walter	Kassoway	Fairfax
Tauny	Kasuya	San Rafael
Lewis	Katcher	Mill Valley
Seth	Kaufman	San Anselmo
Jonathan	Keeton	Mill Valley
Julian	Keippel	Corte Madera
Julian	Keippel	San Francisco
Daniel	Keller	San Rafael
Laura	Kelly	Fairfax
Linda	Kemp	Ross
John	Kemp	Ross
Lauren	Kennedy	San Anselmo
Kelly	Kennedy	San Rafael
Colin	Kennedy	Greenbrae
Bill	Kennedy	San Francisco
Liese	Keon	Larkspur
Stephen	Kepple	Corte Madera
Bill Kern	Point Reyes Station	
Richard	Kilbourne	Larkspur
Jinwoo	Kim	Larkspur
Kathleen	King	Mill Valley
Lew	Kious	Mill Valley
Susan	Kleinberg	Lagunitas
Kristin	Kloiber	Brimfield
Jennifer	Klopfer	Mill Valley
Blake	Knier	Fairfax
Patrick	Knight	San Anselmo
Daniel	Knightly	Fairfax
Daniel	Kohn	Mill Valley
Tuomas	Kostiainen	San Rafael
Jon Krabbenschmidt		Belvedere
Traci	Krall	San Rafael
Jeffrey	Kroop	Fairfax
Jonathan	Krotinger	San Rafael
Sally	Kuhlman	Mill Valley
David	Kupfer	San Rafael
Denise	Labuda	San Rafael
Denise	Labuda	San Rafael
Sara	Laine	Fairfax
Steve	Lamb	San Anselmo
Dave	Lampert	Novato
Lanny	Lampl	San Anselmo
Crystal	Larios	Kentfield
Christine	Larson	Larkspur
Lisa	Lascala	San Rafael
Timothy J.	Lasheway	Corte Madera
Garry	Lawler	Corte Madera
Josh	Lawrence	Greenbrae
Richard H	Lawrence Jr.	
	Kentfield	
Jennifer	Lawson	Mill Valley
Roger	Lawton	San Rafael
Theran	Lee	Novato
Stan	Lee	Oakland
Scott	Lee	Greenbrae
Richard	Lee	Mill Valley
Nancy	Lee	Corte Madera
Mike	Lee	San Francisco
Kiara	Lee	San Rafael
Ralph	Leighton	Tivuton
Bernie	Lenhoff	Berkeley
Patrick	Lepelch	Mill Valley
Bill	Lescohier	Fairfax

Jack	Lester	Corte Madera
Christian	Levaggi	Mill Valley
Jeremy	Levin	San Anselmo
Daniel	Levin	San Francisco
Susan	Levinson	Greenbrae
Allan	Levinson	Greenbrae
Sandy	Liaw	Corte Madera
Andrew	Lie	Mill Valley
Gabriel	Lieb	Fairfax
Clifford	Liehe	San Francisco
Jay	Linderman	Greenbrae
Stu	Lips	San Rafael
Christopher	Lish	Olema
Nancy	Little	San Geronimo
Lawrence	Litvak	Mill Valley
Lawrence	Litvak	Mill Valley
Rachel	Lloyd	Fairfax
Dr. Eva	Long	Kentifield,
Cheryl	Longinotti	Corte Madera
Summer	Lopez	Mill Valley
Ray	Lorber	San Rafael,
Michael	Lotter	San Anselmo
Janet	Lourenzo	Corte Madera
Marika	Love	San Rafael
David	Lowenfels	Fairfax
Gareth	Loy	Corte Madera
Reinhard	Ludke	San Anselmo
David	Ludwig	Sausalito
Janis	Luft	Tiburon
Karen	Lusk	Corte Madera
Robin	M	Larkspur
Tom Macaleavey		Kentfield
Anita Macaleavey		Kentfield
Ben	Mack	San Rafael
Tom	Macmillan	Mill Valley
Kiran Macpherson		Corte Madera
David Macpherson		Corte Madera
Kristine	Madsen	Larkspur
Don	Magdanz	San Rafael
John	Malone	Novato
Maureen	Manley	Sausalito
Jennifer	Mann	San Rafael
Greg	Maple	Mill Valley
Mark	Marinozzi	Mill Valley
Belle	Marko	San Anselmo
John	Martin	Ross
Debra Ellen		Martin
	Woodacre	
Craig	Martinelli	Lafayette
Michele	Mason	Tiburon
Aron	Mason	San Mateo
Pierre	Masquelier	Tiburon
Madelaine	Matej	Mill Valley
Harald	Matej	Mill Valley
Heather	Mathieson	Novato
John	Matocq	San Rafael
Robert	Mayer	Larkspur
Kim	Maynard	Mill Valley
Kim	Maynard	Mill Valley
Vanessa	Mcbride	Larkspur
Jack	Mcclellan	Bolinas
Carmack	Mccormick	Mill Valley
Preston	Mccoy	San Rafael
Skot	Mcdaniel	Novato
Saci	Mcdonald	San Rafael
Deirdre	Mcdonald	San Geronimo
Lee	Mceachern	Greenbrae
Emily	Mcfarland	Corte Madera
Sara	Mcghie	Tiburon
John	Mcglynn	San Francisco
Brett	Mcintire	San Rafael
Susan	Mckearnan	Berkeley
Lindsey	Mclennan	San Rafael
Heidi	Mcmullen	Mill Valley
Daniel	Mcnamara	San Rafael
Patrick	Mcnicholas	San Rafael
Dorothy	Mcquown	Mill Valley
Kenneth (Bud) Meade		Forest Knolls
Niobe	Melendy	Greenbrae
Nikos	Melendy	Greenbrae
Veena	Melvani	Oakland
Lynn	Menard	Greenbrae
Doug	Menke	Palo Alto
Diane	Merrill	Larkspur
Marcia	Meyers	Novato
Charles	Meylan	Corte Madera
Judy	Milani	San Rafael
Brendan	Millar	Larkspur
Susan	Miller	Novato
Robert	Miller	Tiburon
Lloyd	Miller	San Rafael
Judy	Miller	Novato
Jim	Miller	San Geronimo
Eric	Miller	Corte Madera
Adam	Miller	San Francisco
Gayle And George Mills		San Rafael
Mike	Milton	Novato
Jacqueline	Miranda	Corte Madera
Jonathan	Mitguard	San Rafael
Denise	Mitidieri	San Rafael
David	Moller	Larkspur
Peter	Mollison	San Anselmo
Nicole	Mollison	San Anselmo
Margaret	Mooney	Novato
Joshua	Mooney	Fairfax
Richard	Moore	San Rafael
Peter	Moorhead	Larkspur
Michael	More	San Rafael
Alejandro	Moreno	Woodacre
Fred	Morfit	San Anselmo
Susan	Morgan	Sausalito
James	Morris	Tiburon
Tim	Mossteller	Larkspur
Riyaz	Motan	Fairfax
Peter	Mueller	Sausalito
Leslie	Mueller	San Rafael
Betsy	Muir	San Rafael
Naomi	Muirhead	Sausalito
Christopher		Munoz
	Antioch	
Alexander	Muromcew	Ross
Peter	Namkung	Greenbrae
Bonnie	Namkung	Greenbrae
Ruth K	Nash	Larkspur
Karen	Neal	Larkspur
Matt	Nederman	San Rafael
Marisa	Nelson	Sausalito
Carol	Nelson	San Rafael
Chris	Neumann	Ross
Frank	Neundorf	San Anselmo
Harry	Neuwirth	Ross
Ann	Nichols	Larkspur
Cheri	Nielsen	Mill Valley
Lawrence	Nigro	Fairfax
Joan	Nilsen	San Rafael
Penny	Noble	Mill Valley
Mark	Norstad	Corte Madera
Virginia	Nowak	San Anselmo
Gregory	Nudd	Fairfax
Karen	Nygren	Tiburon
John	Nygren	Tiburon
Meredith	Obendorfer	San Francisco
Rondi	Oestlien	Larkspur
Valentin	Ofshteyn	San Rafael
Lucienne	O'keefe	Greenbrae
Catherine	Olds Point	Reyes Station
Brett	Oloughlin	San Rafael
Alisha	Oloughlin	San Rafael
Kelly	O'mara	San Rafael
Melissa	Orons	Novato
Joakim	Osthus	San Rafael
Anny	Owen	Corte Madera
Janet	Oyen	Mill Valley
Norm	Page	San Anselmo
Josh	Painter	Mill Valley
Elizabeth	Palacios	Larkspur
Nicole	Palkovsky	San Anselmo
Lisa	Paningsoro	San Rafael
Vincent	Pannepacker	Tiburon
Brian	Parish	San Francisco
Brian	Parish	San Francisco
Jarel	Parker	Greenbrae
John	Parnell	Novato
Tim	Parr	Mill Valley
Michael	Parrett	San Rafael
Jeffrey	Parrish	Corte Madera
Steve	Patrizi	Greenbrae
Charlotte	Patterson	Mill Valley
Anne	Pearl	Larkspur
Martin	Peckins	San Rafael
Sally Dion	Pennypacker	Forest Knolls
Devi	Peri	Fairfax
Andy	Peri	Fairfax
Michael	Pero	Stinson Beach
Frank	Peronetto	Mill Valley
Lou	Perrelli	Larkspur
Shoshana	Peters	Larkspur
Teri	Peterson	Larkspur
Sandra	Peterson	Albany
Kurt	Peterson	Mill Valley
Pamela	Pierce	San Rafael
Philip	Pillsbury	Larkspur
Paul	Pina	San Rafael
Erin	Pinto	Muir Beach
Jenny	Pisillo	San Anselmo
Bob	Planthold	Oakland
Mark	Pletcher	San Rafael
Alan	Podesto	Cloverdale
James	Polack	San Rafael
Steven	Pollock	Novato
Paolo	Pompanin	Mill Valley
Harvey	Poppel	Tiburon
Kevin	Porter	San Anselmo
Jessica	Powell	Fairfax
William	Prestwood	San Francisco
Claud	Price	Larkspur
Ian	Prowell	Greenbrae
Jory	Prum	Fairfax
Davin	Pukulis	San Francisco
Philip	Quadrini	Sausalito
David	Quattro	Novato
Lauren	Ramsey	Mill Valley
Nathan	Randel	Mill Valley
Luca	Rattazzi	San Francisco
Patricia	Ravasio	Corte Madera
Patricia	Ravicz	Novato
Jocelyn	Ray	Mill Valley
Martin	Rayman	Kentfield
Mary	Redfern	San Rafael
Nicole	Rehder	San Rafael
Karen	Rehder	San Rafael
David	Reichard	Guerneville
Wesley	Renzas	Sausalito
Jon	Reynolds	Sausalito
Jo Ann	Richards	San Anselmo
Diana	Richmond	Mill Valley
Eric	Richter	Soquel
Pamela	Rickard	Greenbrae
Laura	Riley	Mill Valley
Jed	Ritchey	Corte Madera
Jennifer	Rivas	Novato
Perry	Robertson	Corte Madera
Ryan	Robinett	San Rafael
Robert	Roehm	Novato
Bob	Roehm	Novato
Deirdra	Rogers	Fairfax
Ben	Rogers	Brookline
Tom	Rohrer	San Anselmo
Glenn	Roiz	Larkspur
Barbara Josephine Rolph		Mill Valley
Bonnie	Romanow	Greenbrae
Elon	Rosenfeld	Fairfax
Yolanda	Rossi	San Anselmo
Nathanael	Rotsko	Brooklyn
Bernadette	Rowan	Mill Valley
Grant	Rudolph	Mill Valley
Christopher	Ruedy	Woodacre
Chris	Ruedy	Woodacre
Martin	Russell	Mill Valley
Eric	Russell	San Anselmo

John	Rutledge	Nicasio
Mary Lee	Rybar	Ross
Robert	Rye	Larkspur
J	S	San Anselmo
Loring	Sagan	Sausalito
Voter	Salin	Fairfax
Mike	Sallaberry	San Francisco
Magali	Salomon	Mill Valley
Toby	Salz	Mill Valley
Sabrina	Sam	Larkspur
R Scott	Samet	San Anselmo
Dave	Sams	Mill Valley
Mike	Samuels	San Rafael
Michele	Samuels	Mill Valley
Robert	Sangalli	San Rafael
Carlos	Saraiva	San Rafael
Barbara	Sardella	Greenbrae
Rebecca	Satinover	San Rafael
Charlin	Sawyer	Woodacre
Leslie	Schaaf	Novaty
Kathleen	Schaefer	Larkspur
Erik	Schmidt	Corte Madera
Joel	Schmukler	Mill Valley
Richard	Schneider	San Rafael
Jeffrey	Schneider	San Rafael
Florence	Schneider	San Anselmo
Robert	Schonefeld	Tiburon
Judy	Schriebman	San Rafael
Erik	Schten	Larkspur
Robert	Schuchardt	San Francisco
Mike	Schulist	San Rafael
Kalara	Schuster	Mill Valley
Larry	Schwartz	Fairfax
Laura	Sciaroni	Mill Valley
Thomas	Scott	Fairfax
Elio	Scudieri	Santa Cruz
Terry	Seaton	Corte Madera
Lisa	Sebastian	Fairfax
Shelley	Secondo	San Anselmo
Matt	Sellers	San Rafael
Mary	Serphos	San Anselmo
Gina	Servina	Larkspur
Matthew	Sessions	Mill Valley
Narek	Sevacheryan	Tiburon
John	Severinghaus	Ross
Jean Severinghaus		Greenbrae
Rob	Shattuck	Novato
Greg	Sheffer	Mill Valley
Aj	Shepard	Corte Madera
Janie	Sheppard	Ukiah
Michel	Sherman	San Rafael
Jane	Sherman	Lakrkspur
Mark	Sheron	Novato
Fumio	Shibata	San Rafael
Nick	Shryock	Corte Madera
John	Shurtz	Oakland
John	Shurtz	Oakland
Linda	Siegel	Greenbrae
James	Sievert	Corte Madera
Heather	Sievert	Corte Madera
Joe	Silverman	Sausalito
Vesela	Simic	Kentfield
James	Simmons	Berkeley
Timothy	Singleton	San Francisco
Charles	Sipos	San Francisco
Dylan	Skerrett	Corte Madera
Amy	Skewes-Cox	Ross
Julie	Skopal	Corvallis
Mark	Slate	San Rafael
Craig	Slater	Fairfax
Matt	Slepin	San Rafael
Steven	Smith	Corte Madera
Judy	Smith	Larkspur
John	Spallone	San Francisco
Ann	Sparkman	Corte Madera
Nancy	Spellman	San Rafael
Len	Spitzer	Oakland
April	Spooner	San Rafael
Christopher	Spratt	San Rafael
Loretta	Stec	San Rafael

John	Stechschulte	San Diego
Steven	Stenberg	Novato
Aaaron	Stern	Mill Valley
Cameron	Stewart	San Rafael
Jamie	Still	San Francisco
Roger	Stoll	San Rafael
Wencil	Storek	San Anselmo
Geoffrey	Strawbridge	Mill Valley
Albert	Strietmann	Sausalito
Erik	Stromberg	Fairfax
Lorna	Strutt	San Francisco
David	Sudlow	Novato
Liz	Swearingen	Larkspur
Nancy	Swig	Larkspur
Leah	Swiler	Corte Madera
Matt	Switzer	San Rafael
Albert	Szilvasy	San Rafael
Richard	Tan	San Rafael
Larry	Tan	San Anselmo
Valerie	Taylor	San Rafael
Karl	Tede	Larkspur
Dan	Teich	Washington
Kristina	Teplin	Forest Knolls
Lloyd	Tepper	San Rafael
Sara	Terrien	Mill Valley
Nancy A	Thomas	San Rafael
Ann	Thomas	Corte Madera
Elisabeth	Thomas-Matej	Mill Valley
M Kathryn	Thompson	Fairfax
Maurice	Tierney	Emeryville
Lopresti	Toby	Fairfax
Lori	Tompkins	San Rafael
Christopher	Tonry	San Anselmo
Jonathan	Toste	San Rafael
Lorraine	Trautwein	San Anselmo
Kirsten	Treais	Mill Valley
Wanden	Treanor	Greenbrae
Dimitri	Tretiakoff	San Rafael
Bob	Trigg	San Anselmo
Cathy	Tsao	Fairfax
Monique	Tse	San Anselmo
Lou	Turi	Greenbrae
J	Turner	San Rafael
Donald	Turner	Mill Valley
Phillip	Tweedie	San Anselmo
Phillip	Tweedie	San Anselmo
Chris	Urban	San Rafael
Christopher		Uren
	San Rafael	
Zach	Usi	Daly City
Frank	Valentini	San Rafael
Delia	Van Der Plas	
	San Anselmo	
Constance	Vandament	Larksur
Sergio	Velasquez	Novato
Marc	Vendetti	Fairfax
Jeffrey	Vickers	San Geronimo
Vogel, Mft	Victoria	Mill Valley
Jon	Vincelette	San Anselmo
Paul	Vine	Novato
Julia	Violich	San Anselmo
John	Vipiana	San Rafael
Thomas	Voigt	San Rafael
Alex	Vollmer	San Rafael
Greg Von Buchau		San Anselmo
Achim	Von Neefe	Oakland
Elyse	Vosburg	Novato
Dusya	Wagner	Greenbrae
Steven	Waisman	Larkspur
Tricia	Walalce	Corte Madera
Michael	Wallenfels	Novato
Brenda	Walsh	Larkspur
Michael	Wang	Corte Madera
Michael	Wanger	Kentfield
Michael	Wara	Mill Valley
Scott	Warner	Novato
Nancy	Warren	San Rafael
Karl	Warren	Sausalito
Dwayne	Warren	San Rafael
Steven	Wasserman	Fairfax

Michael	Watkins	San Anselmo
John	Watkins	Kentfield
Boyd	Watkins	San Francisco
William	Watson	San Anselmo
Parabar	Weber	El Cerrito
Alan	Weiler	Lagunitas
James	Weinberger	San Rafael
Jonathan	Weisblatt	Mill Valley
Kevin	Weitz	San Rafael
Elihu	Welber	San Anselmo
Heather	Wells	Greenbrae
Nancy	Weninger	Larkspur
Raoul	Wertz	Mill Valley
Lisa	Westin	Novato
Pete	Wheelan	Mill Valley
Ned	White	Larkspur
David	White	Santa Rosa
Cynthia Whitman-Bradley		Fairfax
Melanie	Wice	Mill Valley
Paul	Wicks	Larkspur
Eric	Wilcox	Kentfield
Dean	Wilcox	Sausalito
Pat	Williams	Corte Madera
Melisa	Williams	Mill Valley
Mark	Williams	Fairfax
Judd	Williams	Mill Valley
Conrad	Williams	Greenbrae
Sam	Wilson	San Anselmo
Land	Wilson	San Rafael
Mary Carol	Winkler	San Rafael
Cindy	Winter	Greenbrae
Cindy	Winter	Greenbrae
Barb	Withers	San Rafael
Theodore	Witt	Corte Madera
Neal	Wolfe	Greenbrae
Ben	Wolin	San Anselmo
Kirk	Wollenweber	
	Greenbrae	
Daniel	Wonnacott	Fairfax
Susanne	Woods	Forest Knolls
Debra	Woods	Mill Valley
Tom	Woolley	Novato
Eileen	Worthley	Mill Valley
Liza	Wozniak	Larkspur
Graham	Wright	Livermore
Barbara	Wyeth	Bolinas
Mathew	Wyman	Mill Valley
Linda And Zhan Yang		Greenbrae
Craig Thomas Yates		San Rafael
Russ	Young	San Rafael
David	Young	San Anselmo
Elliott	Zalta	Greenbrae
Beth	Zamichow	Corte Madera
Nash	Zamzow	San Rafael
Janet	Zanetto	San Rafael
David	Zebker	San Francisco
Bill	Zemanek	Petaluma
Daniel	Zemelman	Fairfax
Yoyo	Zhou	San Francisco
Eric	Zickler	San Anselmo
Steve	Ziman	San Rafael
Jacqueline	Zimmer Jones	Mill Valley
Jay	Zutant	Sausalito
Anonymous		Novato
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Anonymous	Greenbrae
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Anonymous	San Rafael
Anonymous	Corte Mader
Anonymous	Mill Valley
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Anonymous	Greenbrae
Anonymous	San Rafael

Kentfield Planning Advisory Board

P.O. Box 304, Kentfield, California 94914

February 14, 2013

Valerie Shearer, Senior Environmental Planner
Caltrans District 4
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660
Email: valerie_shearer@dot.ca.gov

Re: Highway 101 Greenbrae/Twin Cities Corridor Improvement Project
Initial Study and Mitigated Negative Declaration

Dear Ms. Shearer:

The Kentfield Planning Advisory Board (KPAB) is a citizen group appointed by the Marin County Board of Supervisors to make recommendations to the county on land use and public works projects in the unincorporated Kentfield and Greenbrae area. We are advisory, not decision-makers, to county staff and elected officials.

While this project is not located in the unincorporated area for which we review projects, it is a major travel corridor for the entire Ross Valley and would affect the convenience and safety of Kentfield and Greenbrae residents driving, walking or using public transit on a daily basis.

We are particularly concerned about: pedestrian safety of transit stops; failure to address flooding in the project area, congestion on Sir Francis Drake Blvd, the sharp turn and merge required for NB traffic exiting 101 to head west on SFD, impacts of the East Bay traffic which is a primary cause of peak hour congestion at the interchange and on 101, plans and schedules for construction, and how the project would affect Larkspur Landing and ferry terminal traffic on East SFD. Insufficient information is provided about proposed ramp metering at the on-ramps to know if this would help drivers entering SB 101 from SFD.

It is hard to understand details of the project from the project document. Figure 1-2 on p. 1-15 does not have sufficient detail. Indeed, the environmental document is superficial and should be redone as an Environmental Impact Report with more detail and a full analysis of alternatives.

We request the following information be provided.

Greenbrae Transit Stops. There are four stops proposed in the vicinity of the interchange. Please provide an exhibit, with overlay showing existing conditions, which shows the following:

- Location of the transit stops in relation to the roadway and the vehicle traffic lanes at those locations and their direction of movement.
- The sidewalks, walkways or crosswalks that riders would use to access and leave the transit stops including the distance from the transit stop to their parked cars if they would be parking nearby to use a bus. Otherwise, explain where riders would originate.

- Parking lots or other points where bus riders would leave cars, or indicate if the project anticipates riders walking from home or workplace to the transit stops. Include the number of parking spaces available in the area for transit users and their location.
- Projected flood elevations of the transit stops if the stops are proposed in a floodplain or where BCDC or FEMA projections indicate future probable intrusion of bay waters or flooding which is caused by combinations of high tides, storm surges, wind-driven waves, and, in the future, sea-level rise. The project description indicates that the project planning horizon is at least to 2035. BCDC projects (p. 2.6-18) up to 16 feet sea level rise by 2050 so some of this would take place by 2035.

Separately provide an analysis of these walkways or crosswalks with regard to pedestrian safety, and details on Golden Gate and Marin Transit schedules that would serve the stops.

Flooding and Sea-Level Rise. The discussion under 2.6 on Climate Change is largely unrelated to the project and defers consideration of sea level or flooding impacts until the state or other agencies have specific plans and recommendations. This is not a responsible approach in planning a project that presumably would have a design life of several decades and be used by thousands of people daily. The environmental document admits that alternate routes would not have the capacity to handle traffic diverted from Highway 101 in a flood situation and this should be addressed in more depth than this document provides.

Please provide an exhibit that indicates probable floodwater elevation in the Greenbrae project area at least for 2035 and 2050. Describe possible measures, such as flood walls, roadway elevation height changes and alternate access routes from East and West SFD to Highway 101 that could be constructed that would keep cars and people out of harm's way in flood events.

Project Construction. Aside from some protective measures regarding air quality, noise and avoidance of nesting season, there is no description of the construction. TAM representatives stated that the project would be built in phases as funds become available; this indicates that construction could occur over a long time, at least two years. The project document merely states (p. 1-20) that "...proposed construction will require temporary roadway and shoulder closures and detouring which will be planned for in a Transportation Management Plan...". Due to the massive and significant impacts this work will create for Kentfield and Greenbrae drivers information on this work should not be deferred to a plan to be written after project approval. A full description of the work and its impacts should be in the project document or EIR.

Please provide a timetable for the work to be done along with a description of attendant roadway closures and redirection of traffic to alternate routes that would be needed. Also provide the number and type of construction vehicles, where construction parking would take place, locaton of laydown areas, and the impact of construction vehicles and operations on GHG emissions.

Provide graphic representation of any changes to local roads that would take place during construction, e.g. lane changes or changes in traffic signals on SFD, Bon Air Road, Magnolia Avenue and at SFD intersections along the way. Include aerial views of any changes proposed (parking location/configuration, lanes, medians, pedestrian and bicycle movement, access points) that would occur. Enumerate the number of any public parking spaces that would be lost and

represent any changes to roadway landscaping required to improve sight distance. Use overlays to show proposed changes to existing conditions.

Sir Francis Drake Congestion/NB Exit to SFD West. Residents of the Ross Valley are concerned about daily congestion on Sir Francis Drake Blvd and the project does not indicate any improvement to this even though the project extends to Eliseo Drive. It appears that the project does not even address the sharp curve at the northbound exit from 101 to SFD headed west. There is a sharp left curve here followed quickly by a merge with traffic exiting SB for 101 to SFD and traffic coming from east SFD. This should be improved. Please describe how the project affects this exit and merge and measures that would improve this for drivers.

Ramp Metering. The project description states that ramp meters may be used. While we recognize that this strategy, to hold surface traffic at on-ramps when the freeway is congested, can be useful, it could also impact drivers coming from the Ross Valley who could be delayed by the metering. Please describe how this measure would be implemented at the SB SFD on-ramps and any measures to ensure that unacceptable backups and increased congestion do not occur.

SB SFD On-Ramp Extension/Merging. Although a project goal is elimination of the short merge distances in the interchange, at least with the SB SFD on-ramp the project appears to only push the merge operation to Fifer Avenue where it merges onto Highway 101. At this juncture the SB traffic from East and West SFD appears to be joined by vehicles entering from Fifer Avenue, with all lanes merging onto 101. This would seem to create a bottleneck at this location. The exhibits and text do not fully explain this. Please provide a graphic of the SB SFD on-ramp, the proposed flyover, changes at Fifer Drive and the merge onto Highway 101, showing on the graphic the number of lanes at any one location and the distances along the way between the various changes. The project document states (p. 1-12) that Caltrans' standard weaving distance is 1,600 feet, but it is not clear exactly what would be the appropriate distance in which to accomplish this merge. Please provide detailed information along with a graphic representation of what would take place at this entry point to 101 so the public can assess how this would work.

East Bay Traffic. The project document states (p. 1-10) that the causes of Highway 101 SB congestion "are the bottlenecks at the intersection of Sir Francis Drake Boulevard and Eliseo Drive…and the high traffic volumes entering the highway from Sir Francis Drake Boulevard…between Sir Francis Drake Boulevard and Fifer Avenue." There is no mention of the volume of traffic that moves through this interchange from the East Bay. This should be acknowledged and analyzed for its cumulative impacts on the interchange.

Larkspur Landing/Ferry Terminal Intersection. The Larkspur Landing/Ferry Terminal intersection is problematic and should be analyzed in relation to this project. When traffic is backed up, it delays Kentfield/Greenbrae residents from traveling westbound on SFD under 101.

How does this project impact this intersection, especially if more people try to enter 101 from the east or as more pedestrians try to cross SFD from buses at new transit stops? Impacts that could reasonably occur due to the proposed train station and Larkspur Landing Station Area Plan currently being processed by Larkspur should be assessed.

Project Alternative Designs. A range of alternatives to the Build Alternative, should be developed and analyzed in an EIR in the same depth as the Build Alternative. Design should focus on minimal changes to address major deficiencies at this time, and there should be no major construction until such time as the flooding problem in the project area is addressed. More modest projects that could be evaluated could include, for example, eliminating the exit at Lucky/Fifer from 101 Southbound and using SFD or Madera Boulevard to exit 101 and reach Lucky/Fifer, or providing an auxiliary lane from SFD to Tamalpais Avenue. These would eliminate the need for the flyover described.

Project Description and Visual Impacts. The document does not have an exhibit that shows in one place all the proposed construction and roadway changes with sufficient graphic detail. Please provide one good graphic showing current conditions and proposed changes, with distances, number of lanes, etc. all indicated. This could be done on an 11 by 17 inch sheet, with an overlay of existing conditions and should be available to the public.

The visual impacts from Greenbrae of changes proposed are not clearly defined. Please provide some simulations of the proposed flyover and interchange work from the multi-use path that runs along the creek on the west side of Highway 101.

In summary, the Kentfield Planning Advisory Board requests this project to include:

- A solution for flooding and sea level rise for the life of the improvements to the roadway,
- Analysis and a solution for improvements to the exit from 101 and the intersections at Eliseo Drive and SFD as well as at Larkspur Landing Circle and SFD to handle the increase in traffic load both vehicular and pedestrian,
- An analysis of the proposed increase in pedestrian traffic and its impact on circulation,
- An analysis of the construction phase of the project and the proposed mitigation for its impact on pedestrian and vehicular traffic,
- An interim solution to improve safe traffic flow until these issues can be resolved.

Yours truly,

Anne Petersen

Anne Petersen, KPAB Chair
KPAB Members: Alan Derwin, Sandy Guldman, Dale Hansen,
Eva Long, Pamela Scott, Mary Sylla; Ann Thomas, Secretary

Cc: Greenbrae Property Owners Association
Kent Woodlands Property Owners Association
Larkspur City Council
Corte Madera City Council
Bill Whitney, Transportation Authority of Marin
Supervisor Katie Rice

Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

February 14, 2013
By E-Mail

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Dianne Steinhauser
Transportation Authority of Marin
750 Lindaro Street, Suite 200
San Rafael, CA 94901

Re: Greenbrae Corridor Improvement Project Proposed MND

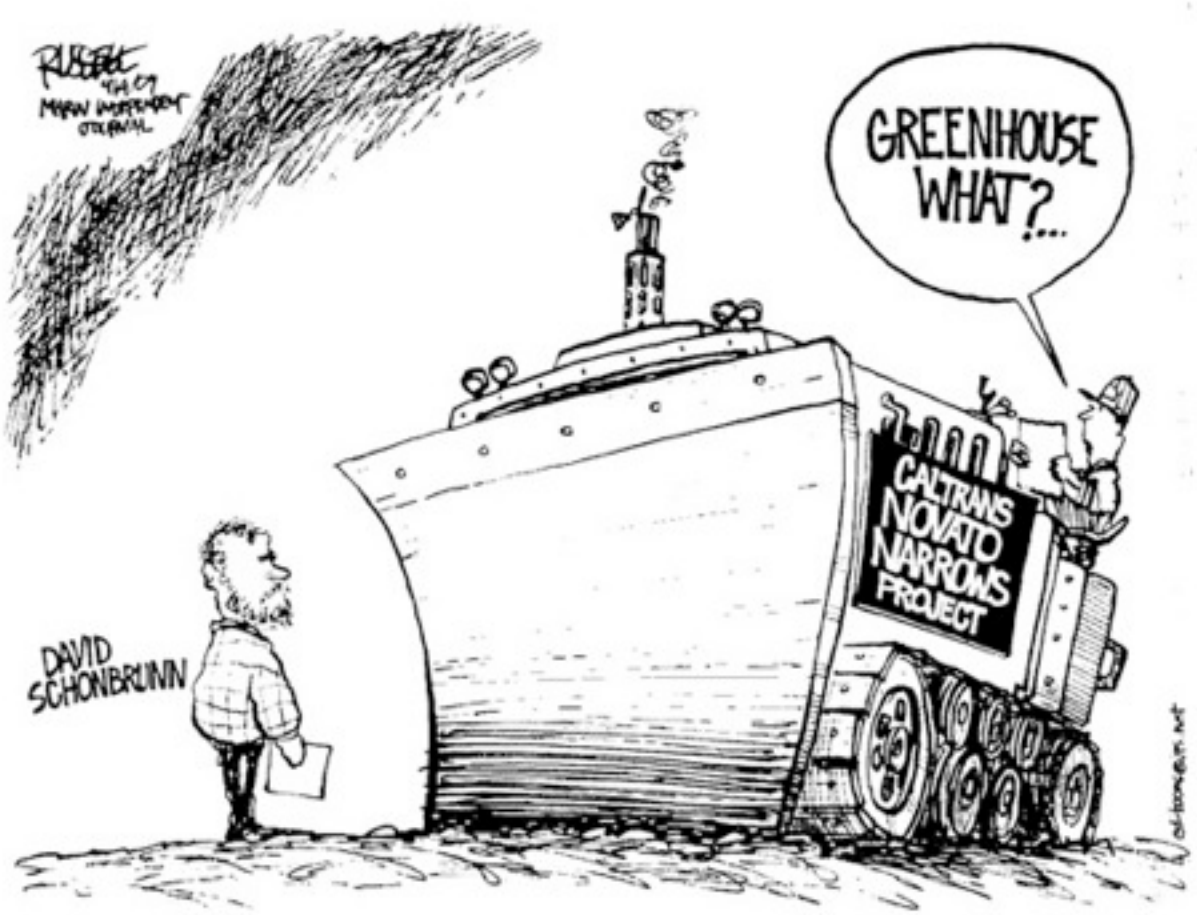
Dear Ms. Shearer and Ms. Steinhauser:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is a Marin-based environmental organization dedicated to the regional planning of transportation, land use and air quality. Our focus in recent years has been reducing the impact of transportation on the climate.

That focus led us to file suit against Caltrans, challenging the EIR for the Marin-Sonoma Narrows because it failed to perform a multi-modal alternatives analysis and to adequately analyze induced demand. (See memento on next page.) The Initial Study (with Proposed Mitigated Negative Declaration)/Environmental Assessment ("Initial Study") document for the Greenbrae Corridor Improvement Project ("Project") indicates that, despite the sharp increase in the scientific understanding of climate change since those days, strikingly little has changed at Caltrans.

The Initial Study is notable in its unquestioned assumption that the only solution to a traffic problem is more highway lanes. The absence of any transit ridership modeling and mode split analysis indicates that the preparers never considered the possibility of multimodal solutions. There wasn't even any transit Level of Service statistics in the description of transit conditions on p. 2.2-42 (although there was a set buried deep in Appendix B). This is a strong indication that no thought whatsoever was given to the possibility of significantly increasing the transit mode share for suburban choice riders by expanding transit service. Preparers seem to be stuck in the false belief that people that use transit are fundamentally different from those that drive. The only transit outcomes from the Multimodal Report (Appendix B) are the relocation of bus stops.

The failure to consider multimodal alternatives makes the proposed Mitigated Negative Declaration (MND) legally inadequate under CEQA and NEPA. It is also indicative of being stuck within the status quo groupthink that was prevalent prior to the widespread recognition of climate change. This conduct is no longer excusable. TRANSDEF believes it to constitute--or should constitute--professional malpractice.



TRANSDEF fully recognizes the significant changes in lifestyle and unprecedented levels of interagency cooperation needed to make multimodal alternatives work well. The point that seems to have been lost on senior management at Caltrans is that the consequences for continuing a Business as Usual approach to transportation planning are dire. (See attached articles on the costs and impacts of climate change.)

Here is an example of a Multimodal Alternative: One of the biggest traffic generators in the Greenbrae Corridor is the Larkspur Ferry Terminal. In its self-imposed silo, Caltrans never considered a Transportation Demand Management (TDM) alternative that would significantly reduce traffic going to and from the Terminal, apparently because that would require working with another agency. If GGBHTD were to institute a significant parking charge at the Terminal and commence free and fast shuttle service on SFD, that could have a dramatic effect on the congestion complaints that triggered the Project.

Similarly, it is widely believed that large numbers of Solano County solo drivers help clog up Highway 101 NB in the PM peak hour. Yet there was no study of the origins and destinations of Richmond Bridge users, to investigate the feasibility of van pool marketing. Finally, there was no analysis of the potential for TDM at San Quentin Prison, a very large employer that might possibly impact the Greenbrae Corridor.

TRANSDEF views the Project as a bait-and-switch. The Project was initially sold as a solution to the overloaded traffic signal at the NB US 101/ SFD intersection. Then, most of the discussions and open houses centered around ramp closures to decrease weaving and increase safety. A close study of the Initial Study, however, indicates that the most significant feature of the Project is a new auxillary lane in each direction, which is what enabled the conclusion that “The Build Alternative would relieve the bottleneck under the No Build Alternative and serve much higher volumes.” (Traffic Operations Report, pp. 77-78.)

This capacity expansion was quantified: “When compared with the No Build Alternative, the Build Alternative would serve approximately 20 to 55% more vehicles during the PM peak hour under Construction Year (2015) and Design Year (2035) conditions.” (Traffic Operations Report, p. *x*.) This is a significant capacity expansion, despite claims to the contrary, which are discussed below.

If the Project goes forward to build auxillary lanes, despite the climate change implications discussed below, TRANSDEF proposes the following findings and tasks:

1. The visual impacts of the NB braided ramp structure are the consequence of implementing an on-ramp at Warnum Drive, for the purpose of enabling mainline freeway access from the Industrial Way area, replacing the awkward Industrial Way on-ramp/SFD traffic light/SFD on-ramp.

2. This is a classic example of the cure being worse than the disease. These ramps have garnered tremendous public antagonism and opposition, both for their visual impacts and their cost.

3. The proposed new NB US 101 Warnum on-ramp does not meet Caltrans spacing standards, as it is too close to Tamalpais Drive.

4. Conduct a survey of drivers attempting to leave the Industrial Way area and head north on US 101, beyond SFD. Find out how many of them there are, where they are coming from, and where they are going.

5. If the number is as modest as expected, decide that no mainline freeway access will be provided from the Industrial Way area. Drivers seeking to proceed north will still be able to use either the Tamalpais Drive on-ramp or make a U-turn after entering EB SFD. This will be a cost-benefit decision that weighs the convenience of these NB drivers against the cost and public dissatisfaction of a braided structure, and the benefit to SFD traffic operations achieved by eliminating the straight-through signal phase.

6. Eliminate the NB braided ramp structure, which causes unnecessary cost and visual blight.

7. Construct an auxillary lane from the Tamalpais Drive diamond on-ramp to the SFD/ Industrial Way off-ramp. It will provide an appropriately located on-ramp and an off-ramp to Redwood Highway.

8. Weaving is the result of too many on-ramps in close proximity. The only reason for the complexity of the Project's design is the unwillingness of the local jurisdictions to have any ramps closed, for fear of upsetting their residents. Their position is antithetical to protecting public health and safety, as keeping all the ramps open contributes to weaving and collisions.

9. Preserving the convenience of local residents is not a sufficient basis for the expenditure of over $50 million in regional funds to build braided ramps.

10. While understandable, it was a serious policy mistake to spend millions of dollars designing the Project to cater to the wishes of the local jurisdictions.

11. Since the rationale for the project is the elimination of weaving, the most obvious and reasonable thing to do would be to close the Fifer Avenue on-ramp. This would immediately eliminate the cost and visual blight of a braided ramp structure.

12. In addition, erecting a barrier between the SFD SB US 101 on-ramp and the mainline would close the access to the Fifer off-ramp from the mainline, eliminating the other aspect of the weave as well. The barrier would end south of the Fifer off-ramp, allowing SFD on-ramp traffic to merge with mainline traffic. The SFD on-ramp would continue to have access to the Fifer off-ramp.

13. SB US 101 access to Fifer would be via a new off-ramp located on the US 101 SB viaduct, shortly after the SFD off-ramp. This new ramp would connect to and merge with the SB US 101 SFD on-ramp above Corte Madera Creek. This would be less visually intrusive than a braided ramp because it would be an extension of the existing US 101 viaduct.

14. The Initial Study offers no operational justification for a SB US 101 auxillary lane from the Fifer on-ramp to the Tamalpais off-ramp. Eliminate this widening as an unnecessary expense.

15. If weaving continues to cause excessive injuries and collisions, close one or both of the Madera Blvd. ramps.

<u>Specific Comments on Initial Study Text, with Page References</u>
vii: The organization of the Initial Study is chaotic. The List of Appendices is not in the Table of Contents. These Appendices were apparently not posted online, which is why we never found the Initial Study Checklist, the most basic element of an Initial Study.

Apparently no master list of documents exists. I was rebuffed when I asked TAM staff for an online version of the complete document. All that is available is a set of chopped up excerpts, with random file names. It is extraordinarily difficult to navigate between all the various sections. In the absence of evidence to the contrary, this appears intentional.

1-9: Caltrans is dishonest in claiming that auxillary lanes are not capacity improvements (FN 7), and that this project "intends to improve the efficiency of US 101, and improve safety, without increasing overall capacity through the corridor." The 71% reduction in vehicle hours of delay and 24% increase in NB PM peak volume in 2035 (pp. 52 & 53) are not the result of safety improvements. They obviously come from expanding the freeway. Auxillary lanes are Caltrans' premiere method of increasing capacity, when adding mixed-flow lanes would violate the Clean Air Act.

1-9: The Initial Study offers lip service to multimodalism ("In addition, project improvements to existing transit and pedestrian/bicycle facilities, and the construction of new facilities, are intended to make these alternative modes (i.e., buses, bicycles, and pedestrians) more attractive and efficient in order to reduce traffic volumes in the Greenbrae/Twin Cities Corridor.") but does not actually <u>deliver</u> any significant reductions in traffic volumes.

1-10: Please update this statement to reflect current conditions: "NB US 101 between the on-ramp at Industrial Way and the off-ramp at Sir Francis Drake Boulevard. Traffic entering the highway at the Industrial Way on-ramp is prohibited by lane striping only."

1-11: The projected 36% increase in traffic volumes in 2035 highlights a significant problem in transportation demand modeling: its failure to adequately reflect the phenomena of congestion equilibrium and demand destruction. Congestion will not go beyond a specific point, absent growth in capacity, because drivers will defer or cancel trips if traffic is too bad. Anthony Downs famously described this as the Triple Convergence. Please provide a suitable backcast to demonstrate that the model in question is capable of accurately projecting greatly increased levels of congestion.

1-12: Nonprofessional readers of the Initial Study are unable to evaluate the significance of the highly technical accident statistics in Table 1-1 without definitions of the terms.

1-14: While the text includes a call for new bus stops, the only discussion of them is in TOR Appendix B. They are not analyzed in the Initial Study.

1-15: This project is very complex and difficult for a member of the public to fully comprehend. A traditional highway lane schematic diagram is needed. Figure 1-2, while very helpful, is not an adequate replacement. Figure 2-5 is missing part of the lane markings, and can't clearly show all lanes, because of the braiding, so it does not serve as a replacement, either.

1-20: The TDM programs that were discussed are a joke. Of course they would not satisfy the purpose of the project by themselves. To do that, a serious TDM program would be needed. That might entail placing a toll on using Highway 101, or requiring shopping centers to charge a market rate for parking.

1-21: The Land Use Assumptions fail to mention the Larkspur Landing Station Area Planning process, which is currently in process. The plan could result in very significant development in the Larkspur Landing area.

2.2-4: Contrary to the assertion that the Project is consistent with Corte Madera Policy CIR-2.1, “Priorize options for improving bicycle and pedestrian access across Highway 101” and Larkspur Policy f, “Freeway imporvements should include protected crossings for pedestrians and bicycles,” it is clear that removing access across the Highway must be considered a Significant and Unavoidable Impact.

2.2-6: Figure 2-2 includes the Greenbrae Boardwalk within the Ecological Preserve. This appears to be a mistake.

2.2-16: As stated earlier, the 24% increase in NB traffic volumes directly disproves the assertion that: “However, these improvements will not increase overall capacity through the corridor.” The increase in VMT indicates additional trips, which could be trips from development induced by more tolerable freeway conditions. We challenge the conclusion that the Project will have no impact on growth. The Project will prevent the further deterioration of freeway operations, which would otherwise discourage developers from seeking zoning changes for increased development.

2.2-21: Figure 2-5 is apparently the only map in the Initial Study that shows where the construction will actually take place. Another copy of the base map is needed to identify the new lanes, and where they are in relation to the existing lanes.

2.2-32: While the SB on- and off-ramps are described in the text, there is no corresponding description of the NB Industrial Way ramps, or the traffic there. This description is crucial because the initial premise of the Project was to reduce the impact of these ramps on SFD traffic signal operations.

2.2-32: The description of Tamalpais Drive should distinguish for non-engineers between the loop and diagonal ramps, as this is not defined anywhere in the document.

2.2-36: Apparently no analysis was ever done to identify the traffic generator west of Highway 101 on SFD. Clearly, if it is significant enough to jam up the freeway off-ramp and SFD, it deserves to be studied in detail to evaluate the potential for TDM. If this is traffic heading to the College of Marin and Marin Catholic High School, for example, carpools and increased transit might be highly effective solutions which could improve SFD operations enough to eliminate the need to widen the SFD off-ramp. The disaggregation of demand permits targetted TDM solutions, which are much less expensive than brute force capacity expansion solutions.

2.2-38: Similarly, where are the cars coming from that are entering the freeway NB at Tamalpais Drive? What TDM solutions might be possible?

2.2-46: The statement “South of Sir Francis Drake Boulevard, highway traffic operations will be similar to the No-Build Alternative” strongly implies that there is no operations rationale to build a SB auxillary lane. Provide a technical justification for its expense.

2.2-47: The Initial Study allows the truth to come out for the first time when it admits that: “The auxiliary lane will provide additional capacity for the NB US 101 highway and allow vehicles to enter and exit the highway more easily.” Note that this contradicts numerous assertions to the contrary in the Initial Study.

2.5-5: The Visual Resources section used “site” where it meant “sight.”

2.6-1: To capture the relevance of the Initial Study to the larger issues of climate change, we suggest appending the phrase “, and more particularly for Marin County, from motor vehicles burning fossil fuels” to the following sentence: “An ever-increasing body of scientific research attributes these climatological changes to greenhouse gas (GHG) emissions, particularly those generated from the production and use of fossil fuels.”

2.6-1: Transportation is still the largest emissions source (see Figure 20-18), making this statement incorrect: “In California, however, transportation sources (including passenger cars, light duty trucks, other trucks, buses and motorcycles) make-up the largest source (second to electricity generation) of GHG emitting sources.”

2.6-1: The threat of climate change can only be met by an absolute reduction in GHG emissions. Reducing the growth of vehicle hours travelled will not reduce GHG emissions, it will merely slow its growth. That is why “2) reduce growth of vehicle miles traveled (VMT)” should be ”reduce vehicle miles traveled (VMT).”

2.6-1: The Regulatory Setting, along with much of this section, seems to have been pulled from a much older template, without adequate updating to make it current. It made no reference to the 2012 and 2013 CEQA Guidelines Amendments or to the May 2011 CEQA Air Quality Guidelines issued by BAAQMD. If Caltrans wishes to use its own Thresholds of Significance, it must introduce substantial evidence to justify them, which it has not done. These documents present specific requirements that this Initial Study fails to meet, making it legally inadequate as the evidentiary basis of a Mitigated Negative Declaration. An adequate CEQA document must address these Guidelines.

2.6-3: The threat of climate change can only be met by an absolute reduction in GHG emissions. Reducing the growth of vehicle hours travelled will not reduce GHG emissions, it will merely slow its growth.

2.6-4: The Caltrans Climate Action Plan is actually an action plan to increase GHGs and further exacerbate climate change. Caltrans commits the bulk of its budget to "operational improvements" similar to the Greenbrae Corridor improvements, which encourage continuing dependence on highways. It is preposterous to cite this plan as if it had any beneficial effect on GHG emissions. The largest item in Table II is the SCS process, which is now known to actually increase regional GHG emissions because the per capita targets proposed by MPOs will be overpowered by future growth.

2.6-4: Caltrans' strategy to avoid the fundamental conflict between its highway mission and the reduction of GHGs is captured in its hope that "To the extent that a project relieves congestion in highly travelled corridors, GHG emissions, particularly CO2, may be reduced." By going faster, vehicles may slightly reduce their emissions, but this strategy totally overlooks the issue of induced demand. A faster trip will induce more trips, longer trips, and further land development that depends on convenient auto transportation. When seen in this longer-term context, any improvement of congestion will generate greater GHG emissions, because of increases in VMT.

2.6-6: The unit of Y-axis measurement in Figure 2-19 makes it meaningless for analyzing cumulative climate change impacts. Stalled freeway sections are typically localized, often making the high-CO2 emitting section a minor part of a trip. Without an analysis of entire trips, with a family of curves showing different percentages of travel time stuck in low-speeds, there is no way to conclude anything cumulative from this figure. The commenter received an acknowledgment in an air quality paper that presented a similar chart: Matthew Barth and Kanok Boriboonsomsin, "Real-World CO2 Impacts of Traffic Congestion", (Transportation Research Record, Journal of the Transportation Research Board, No. 2058, Transportation Research Board, National Academy of Science, 2008.) That paper was apparently the source of Figure 2-19, but it is impossible to know, as the Caltrans source document was not available online.

2.6-6: The bibliography associated with the Initial Study was hard to find, as it was hidden away in the last Appendix of the Traffic Operations Report, an entirely illogical place to look for an element of the Initial Study. It is not listed in the Initial Study Table of Contents. There is no justification for not producing a complete Initial Study document and posting it online.

2.6-7: Citing the MTC as working to reduce GHGs demonstrates a lack of understanding of MTC's priorities. MTC's number one project for a decade has been the expansion of the HOV network on behalf of solo drivers. Without any doubt, this will increase regional GHG emissions, vastly overpowering the beneficial effects of its window-dressing projects.

2.6-7: The Operational Emissions section is a series of excuses to ignore and bury the fundamental finding of the Initial Study: the proposed Project will cause increased VMT and GHG emissions. There are no post-2008 citations to substantiate any of the exculpatory assertions made in this section. The state of the art has moved on since then. Without a clear statement that a comprehensive literature search had been

completed immediately prior to the publication of the Initial Study, there is no evidence in the record that any study cited in this section is still relevant today, and that it offers any evidentiary value. On the contrary, TRANSDEF has attached several popular press articles indicating the severity of climate change has already exceeded what had been expected by climate scientists, encouraging a reevaluation of the significance of the GHG emissions analysis.

2.6-11: A mitigation for construction GHG emissions would be to eliminate the large concrete structures, which are perhaps the largest emissions source.

2.6-12: The CEQA Conclusion offers no answers to the Initial Study checklist questions: "VII Greenhouse Gas Emissions--Would the project: a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? and b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?" By failing to answer these checklist questions, the Initial Study is legally inadequate and cannot support the Proposed MND.

2.6-12: The CEQA Conclusion is profoundly flawed and invalid. The Greenhouse Gas Reduction Strategies it suggests will mitigate the Project's increased GHG emissions are already committed through the ARB Scoping Plan to implement AB 32. They are not available to mitigate the impacts of this project. The CEQA Conclusion attempted to double-count these emissions reductions, taking credit for them when the credit is already being taken elsewhere.

2.6-12: The Strategic Growth Plan is based on the same fraud that was discussed above: the vain hope that Californians can continue to drive alone, spending $100 billion on widening System Completion and Expansion to "relieve congestion." It is important to note that the pyramid in Figure 2-21 deceptively implies that the expansion portion of the Plan is only the apex, set on a wide base of much bigger programs. However, this is the reverse of budgetary reality: highway widening gets the predominant share of Caltrans' funding.

2.6-14: See comment above re: 7.8 MMT estimated CO2 savings for SCS plans. This clearly now will not be delivered, cutting out the heart of the alleged mitigations for the increased GHG emissions.

2.6-20: The Adaptation Strategies analysis is a powerful example of institutional paralysis. It lays out competent future scenarios in which the highway would be under water. The consequences are so vast, however, as to leave Caltrans incapable of a thoughtful response. Instead, the conclusion, in effect, is "this is too hard and too expensive, so let's proceed anyhow. We'll ignore the fact that it will eventually be under the Bay."

2.6-20: The Greenbrae Corridor is 180 miles long?

2.6-21: It should be clear to any rational person that Caltrans needs a plan to keep its facilities functioning in a future of sea level rise. The responsible thing to do would be to shelve expensive projects like Greenbrae Corridor in the interim while doing that critical planning. Proceeding with the Project is the height of irresponsibility with public funds and with lives at stake.

Specific Comments on Traffic Operations Report, with Page References
Appendix B, Figure 14, p. 48: The proposed bus stops on NB US 101 on-ramp and SB US 101 off-ramp do not appear to be connected by sidewalks to the pedestrian network.

Appendix B, Figure 15, p. 50: It appears that the proposed SB US 101 bus stop was omitted from the figure.

Conclusion
Climate change is the most serious environment issue of the past two decades. Unless major reductions are made in the consumption of fossil fuels, future generations will suffer greatly from a profoundly altered environment. Caltrans has utterly failed to respond to the severity of the impending catastrophe, or to provide the leadership needed. It needs to change its internal budgetary priorities and help the public change its expectations about future driving, given the stark realities we face.

In the comments above, TRANSDEF provides substantial evidence that several of the impact assessments in the Initial Study are inaccurate, and therefore do not support the proposed Mitigated Negative Declaration. In addition, the absence of a valid multimodal alternatives analysis makes the Initial Study inadequate under both CEQA and NEPA. Therefore, if the Project is to proceed, it must first complete and certify a full EIR.

TRANSDEF is pleased to have this opportunity to comment on the Initial Study and to provide Caltrans with a reasoned analysis of how it should be addressing its mission in the era of climate change. If we can be helpful in developing transit and TDM concepts, please let us know.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

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Sunlight Stimulates Release of Climate-Warming Gas from Melting Arctic Permafrost

Feb. 11, 2013 — Ancient carbon trapped in Arctic permafrost is extremely sensitive to sunlight and, if exposed to the surface when long-frozen soils melt and collapse, can release climate-warming carbon dioxide gas into the atmosphere much faster than previously thought.

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University of Michigan ecologist and aquatic biogeochemist George Kling and his colleagues studied places in Arctic Alaska where permafrost is melting and is causing the overlying land surface to collapse, forming erosional holes and landslides and exposing long-buried soils to sunlight.

They found that sunlight increases bacterial conversion of exposed soil carbon into carbon dioxide gas by at least 40 percent compared to carbon that remains in the dark. The team, led by Rose Cory of the University of North Carolina, reported its findings in an article to be published online Feb. 11 in the *Proceedings of the National Academy of Sciences*.

"Until now, we didn't really know how reactive this ancient permafrost carbon would be -- whether it would be converted into heat-trapping gases quickly or not," said Kling, a professor in the U-M Department of Ecology and Evolutionary Biology. EEB graduate student Jason Dobkowski is a co-author of the paper.

"What we can say now is that regardless of how fast the thawing of the Arctic permafrost occurs, the conversion of this soil carbon to carbon dioxide and its release into the atmosphere will be faster than we previously thought," Kling said. "That means permafrost carbon is potentially a huge factor that will help determine how fast the Earth warms."

Tremendous stores of organic carbon have been frozen in Arctic permafrost soils for thousands of years. If thawed and released as carbon dioxide gas, this vast carbon repository has the potential to double the amount of the heat-trapping greenhouse gas in the atmosphere on a timescale similar to humanity's inputs of carbon dioxide due to the burning of fossil fuels.

That creates the potential for a positive feedback: As Earth warms due to the human-caused release of heat-trapping gases into the atmosphere, frozen Arctic soils also warm, thaw and release more carbon dioxide. The added carbon dioxide accelerates Earth's warming, which further accelerates the thawing of Arctic soils and the release of even more carbon dioxide. Recent climate change has increased soil temperatures in the Arctic and has thawed large areas of permafrost. Just how much permafrost will thaw in the future and how fast the carbon dioxide will be released is a topic of heated debate among climate scientists.

Already, the melting of ground ice is causing land-surface subsidence features called thermokarst failures. A thermokarst failure is generated when ice-rich, permanently frozen soils are warmed and thawed. As the ice melts, the soil collapses and either creates an erosional hole in the tundra or -- if the slope is steep enough -- a landslide.

Former University of Michigan graduate student Katy Keller with a hand on eroded and melting permafrost near Toolik Lake, Alaska. The gully erosion seen here is a type of thermokarst failure, formed when ice-rich, permanently frozen soils are warmed and thawed. (Credit: George Kling)

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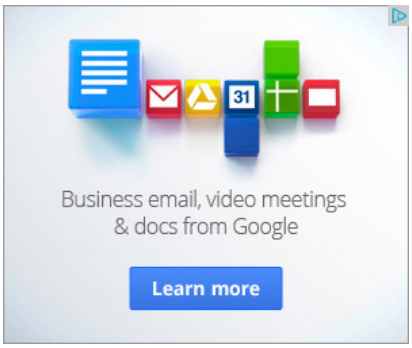

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Thermokarst failures change the trajectory of the debate on the role of the Arctic in global climate, according to Kling and his colleagues. The unanticipated outcome of the study reported in PNAS is that soil carbon will not be thawed and degraded directly in the soils. Instead, the carbon will be mixed up and exposed to sunlight as the land surface fails.

Sunlight -- and especially ultraviolet radiation, the wavelengths that cause sunburn -- can degrade the organic soil carbon directly to carbon dioxide gas, and sunlight can also alter the carbon to make it a better food for bacteria. When bacteria feed on this carbon, they respire it to carbon dioxide, much the same way that people respire carbon in food and exhale carbon dioxide as a byproduct.

"Whether UV light exposure will enhance or retard the conversion of newly exposed carbon from permafrost soils has been, until recently, anybody's guess," said University of North Carolina's Cory, the study's lead author. "In this research, we provide the first evidence that the respiration of previously frozen soil carbon will be amplified by reactions with sunlight and their effects on bacteria."

"We know that in a warmer world there will be more of these thermokarst failures, and that will lead to more of this ancient frozen carbon being exposed to surface conditions," Kling said. "While we can't say how fast this Arctic carbon will feed back into the global carbon cycle and accelerate climate warming on Earth, the fact that it will be exposed to light means that it will happen faster than we previously thought."

The researchers analyzed water from seven thermokarst failures near Toolik Lake, Alaska, as well as 27 other undisturbed sites nearby.

In addition to Cory, Kling and Dobkowski, Byron Crump of the University of Maryland was a co-author of the PNAS paper. The research was supported by several grants from the National Science Foundation.

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1. Rose M. Cory, Byron C. Crump, Jason A. Dobkowski, and George W. Kling. **Surface exposure to sunlight stimulates CO_2 release from permafrost soil carbon in the Arctic**. *PNAS*, February 11, 2013 DOI: 10.1073/pnas.1214104110

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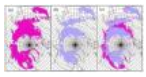

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Predictions of the Human Cost of Climate Change

Feb. 8, 2013 — A new book, "Overheated: The Human Cost of Climate Change," predicts a grim future for billions of people in this century. It is a factual account of a staggering human toll, based on hard data. Author Andrew Guzman, an authority on international law and economics, is a professor and associate dean at UC Berkeley School of Law.

Guzman has studied intractable economic problems, such as poverty, recessions, and trade wars. But, in recent years, one problem loomed larger than all the rest: climate change. It became impossible to fathom the economic impact of state actions without including global warming in the equation.

"Climate change is the most important problem facing the international community in the 21st century," Guzman said. "It's a problem that no country alone can solve, but a solution is imperative."

Countless books exist on the scientific aspects of climate change, but not one on why people should care, said Guzman. So he decided to write for a popular audience, to engage them, to capture their imaginations in a way that would communicate the depth of the problem.

Guzman adopted the predictions of scientists who expect a minimum warming of two degrees Celcius. But even such a modest calculation will mean unprecedented migrations, flooding, famine, and war. It will decimate infrastructures we take for granted, crippling roadways, sewers, and irrigation systems. Social services we rely on (sanitation, transportation, heath care) will cease working normally, and humans will find themselves competing for ever more scarce resources.

"Climate change is going to damage the very foundations upon which we've built our civilization. I don't think people understand how pervasive this problem is," Guzman said.

Examples of the impact of climate change include:

• Flooding and forced migration will push citizens to crowded cities or refugee camps, creating ripe conditions for the spread of infectious diseases. It could lead to a global pandemic similar to the 1918 Spanish Flu that killed 3 percent of the world's population. In the U.S. today, that would mean nine-ten million deaths.

• California's Sierra Snowpack, its most important water source, will have shrunk by a third by 2050. No plan exists for how the state will find enough water for its projected 50 million residents.

• Rising seas will displace populations, ruin farmland, and destroy infrastructure. Bangladesh alone will lose 17 percent of its land mass, the equivalent of the U.S. losing Alabama, Tennessee, Kentucky, Ohio, and every inch of land to the East.

• Rainfall-dependent crop production in Nigeria may fall by 50 percent. Social chaos and the fight over dwindling oil resources could lead to the creation of a terrorist breeding ground.

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• Water flow to the Indus River could drop off by 35 percent, as glaciers melt. India and Pakistan, which have had 4 wars since the 1940s, will have to share this shrinking resource. At issue is life and death for tens of millions on both sides of the border -- and both countries have nuclear weapons.

Guzman acknowledges that it is tempting to ignore the problem or deny its very existence. The harsh reality, however, is that we have to do something now to stem a full-blown disaster in our lifetime. One of the biggest hurdles: political opposition.

"Solving this problem is not going to be free. But as long as politicians are punished for imposing economic costs now in exchange for larger economic gains later, it will be an impossible problem to solve," he said.

In fact, the world's largest emitters of the greenhouse gases (GHG) that cause global warming -- the U.S., the E.U., China, India, and Brazil -- have failed to come to a substantive agreement to reduce carbon output. Carbon dioxide is one of the most damaging of the GHG emissions. Guzman is convinced that U.S. will balk at signing any international accord until its people demand it.

"People have to accept the fact that, as with social security, public education, or military expenditures, we have to pay now for benefits later," he said.

As an economist, Guzman suggests a simple policy solution for the United States: a carbon tax. Taxing carbon up the supply chain as far as possible would raise the price of fossil fuels -- and encourage the development of alternative energy.

Guzman isn't promoting one particular solution; he says a Cap-and-Trade program to regulate GHG emissions could be just as viable. Most important is that we take action. Raise the price of carbon sufficiently to keep the planet from overheating and "prevent human tragedy on a scale the world has never seen." It's a scenario that haunts him daily.

"I'm terrified for my children -- for everybody's children," he said. "The world they are going to inhabit when they're my age in 2050 is not a pretty place. If I have grandchildren, it'll be even worse. One of the features of this problem, which is chilling, is that if you just decide to live with it, it doesn't stabilize. It gets worse and worse with every passing year or decade that we fail to act."

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Re: Initial Study (with proposed negative declaration)/Environmental Assessment for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project

Dear Ms. Shearer:

The Marin County Department of Public Works (DPW) has completed the review of the subject IS/EA and provides the following comments below:

Traffic:

- Although one of the project objectives is to reduce congestion on local roads, congestion is forecasted to increase and traffic operations impacted at the Sir Francis Drake Boulevard / Eliseo Drive intersection. In Table 2.2-19, the Sir Francis Drake Boulevard/Eliseo Drive intersection is forecast to operate at LOS F during the AM. Although it is noted that on page 2.2-47 that the provision of a third eastbound lane and/or westbound travel lane from US 101 to Eliseo could reduce congestion at this intersection, this improvement or other alternatives were not considered and evaluated as part of the project. Additional studies to evaluate the potential improvement's feasibility and identify any potential environmental impacts should be provided.

- Page 2.2-31, under Existing Conditions/Existing Facilities, Sir Francis Drake Blvd., and the study notes the Larkspur Ferry Terminal as a major generator of Commuter Traffic but omits Marin Catholic High School, Bacich Elementary School, College of Marin, Marin general Hospital and the Bon Air Market as major commuter traffic contributors for the corridor.

Flood Control:

- **2.3.1.3 Environmental Consequences Build Alternative, Floodplain Encroachment and Risk of the Action-** The IS/EA should explain in greater detail how the encroachments into the floodplain only represent a transverse encroachment and why these impacts will not pose significant risks

- **2.3.2.4 Avoidance Minimization, and/or Mitigation Measures-** The IS/EA should address whether increases in velocity and volume of downstream flow will have an impact on the Greenbrae Boardwalk development structures.

- **2.4.2.3 Environmental Consequences, Direct Impacts-** The IS/EA should address what the impacts might be to upstream and downstream elevations in Corte Madera Creek if the effects of high tides and heavy rain events are compounded with the effects of the 715 square feet of blocked channel flow.

- While it is noted that construction in the channel from October 15 through June 15 is to be avoided, the possibility of such work is should not be ruled out by the study.

- **2.3.2.4 Avoidance Minimization, and/or Mitigation Measures-** The IS/EA should discuss the possible impacts to upstream and downstream water surface elevations if Corte Madera Creek waters are diverted during the rainy season.

- **Pier Placement-** Will placement of the new permanent piers reduce the travel way for vessels traveling along Corte Madera Creek? If this is being impacted, what will the width and for travel be reduced to? The County of Marin conducts dredging operations in Corte Madera Creek and must be able to pass barges between piers under this section of roadway to conduct work. Will these new piers also cause any new hazard to blocking debris?

Land development:

- **2.2.1.3 Parks and Recreational facilities-** More detail is needed on how the new Class I Bike and Pedestrian trail that is proposed in Lucky Drive will impact driveway access and on-street parking.

Please contact either Bob Goralka at (415) 473-3076 or myself at (415) 473-4398 should you have any questions or require further clarification.

Very truly yours,

Richard Simonitch
Associate Civil Engineer

C: Eric Steger
Berenice Davidson
Rachel Warner, CDA

Administration 415 927-5110
Customer Service

Fire 415 927-5007
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CITY OF LARKSPUR

February 14, 2013

Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
Caltrans District 4
PO Box 23660
Oakland, CA 94623-0660

Re: Highway 101 Greenbrae/Twin Cities Corridor Improvement Project; Initial Study with Proposed Mitigated Negative Declaration / Environmental Assessment.

Dear Ms. Shearer:

Thank you for the opportunity to comment on the Initial Study with Mitigated Negative Declaration / Environmental Assessment for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project (MND). The City of Larkspur has and continues to support the efforts of Caltrans and the Transportation Authority of Marin (TAM) to improve the design of US Highway 101 through the Twin Cities/Greenbrae corridor. The City wishes to acknowledge, and extend its appreciation for, the extensive work of Caltrans and TAM staff on this project to date.

The City recognizes that in the development of a project of this nature and magnitude, scope and purpose are likely to shift. We are therefore surprised that the MND lacks an expansive narrative about the evolution of this project during its lengthy planning process. The MND does not sufficiently explain that what began as a congestion management assessment has expanded to address issues of safety. Nor does the MND help the reviewer understand the relationship of the project's initial purpose – to relieve congestion related to Sir Francis Drake Boulevard – with its now broader scope to resolve congestion and safety issues throughout the corridor. It is not surprising that speakers at recent public forums have questioned the need for the project, as the MND does not enumerate for the reviewer the totality of the project's purpose. The lack of detail limits perspective. Inclusion of a detailed project description and project history will assist the public in understanding the thought process that resulted in the recommended approach.

The City believes an appropriate and necessary way to incorporate a detailed narrative about the project would be to prepare an Environmental Impact Report (EIR), rather than a MND. Through an EIR, Caltrans and TAM can define for the public the many options that have been reviewed during the planning process for this project. These options can be evaluated as alternatives under CEQA, with accompanying narrative explaining why these alternatives are not preferred. The City would like to see the narrative for an EIR reference all options considered to date, including, if possible, early discussions about a new connection between Interstate 580 and Highway 101.

We note that the September 17, 2009 Notice of Preparation of a Draft Environmental Impact Report for this project did offer some options or alternatives. In its initial comments, Larkspur specifically supported the Northbound Option E conceptual plan identified in the preliminary feasibility studies being considered at the release of that notice. We also noted that we supported a thorough analysis of all design alternatives. Despite the potential benefits of the project to relieve congestion and/or reduce traffic hazards on Highway 101, the project clearly has potential to create significant impacts to local communities in the vicinity of the corridor. Our understanding is that there is no tiered source to support the conclusions of the MND. The City of Larkspur believes the lack of any tiered source is another compelling reason to prepare an EIR.

Although Caltrans and TAM have conducted numerous, appropriate studies for the project, and have identified some mitigation measures to reduce potential impacts to the environment, the City of Larkspur finds the proposed Mitigated Negative Declaration is not adequate for consideration of this project for the reasons outlined below.

Consideration of Further Project Alternatives

Essentially, the MND analyzes only one project, with 'Build' and 'No-Build' as the alternatives. Section 1.3.4 briefly discusses the history of public review process in the initial feasibility analysis and the development of two southbound alternatives (A and C) and two northbound alternatives (D and E) to be considered in the final environmental analysis. Although the MND provides rationale for the preparation of a modified Southbound option C and elimination of the Northbound Option D, we do not believe that the MND adequately addresses all comments made by the public and agencies and that an Environmental Impact Report is nonetheless required to fully consider the impacts of these options and provide other project alternatives to address those potential impacts. The City of Larkspur believes the report does not sufficiently justify analyzing only the 'Build' alternative.

The absence of any documentation about the alternatives reviewed during the planning process appears to have hurt the public's perception of the project. An EIR that describes alternatives and embraces discussion about these alternatives would not only be a better approach under CEQA, but would also assist Caltrans and TAM in explaining the merits of its project.

Inadequate for Public Review / Not Properly Circulated

Further undermining the confidence of the public in this process, the MND is a poor tool for helping the public to clearly understand the complexities of the project, the detailed analysis, and the mitigation measures to be implemented. For a project of this scope and extent, the document is simply inadequate in explaining the many of the sweeping conclusions of benefit and/or non-impact, which must be gleaned from the extensive technical studies, whether or not the conclusion is correct. That the technical studies are not identified in the document as technical appendices (or provided as a single document), but rather within an extensive list of other reference materials, simply adds to confusion on the part of the reader.

We also note that the Notice of Intent indicated that the Environmental Document would be available for review at www.tam.gov and http://www.gov.dot.ca.gov.dist4/envdocs.htm. Although the technical studies were provided on both CD-Rom for local agencies' review and on the TAM website, neither website included Appendix A through G of the Initial Study and the Caltrans

website did not include the technical studies. The appendices consist of include several documents that are part of the Initial Study and Mitigated Negative Declaration, including the CEQA checklist, which are important to understanding the legal standing of the document. Both the document and the public notice must be informative to the public and these publications are not. Further, in recent weeks, supporting materials and data have been presented to the public, during the comment review period. Given these circumstances, we suggest not only that environmental document be re-circulated, but that the framework of the environmental analysis as an Initial Study/Mitigated Negative Declaration be re-considered.

Potential Significant Impacts Not Addressed / Analyzed:

The standard of CEQA is that if a fair argument exists that a project may cause a significant effect on the environment, the lead agency must prepare an EIR. The City of Larkspur believes that the project results in potentially significant impacts that need to be either further analyzed, acknowledged, and/or fully mitigated:

Aesthetics / Visual Resources

Larkspur strongly disagrees with the conclusion that the project will not have significant visual and aesthetic impact on the local community in the Redwood Highway area:

1. As demonstrated in the photo-simulations from the Redwood Highway vantage points, (Figures 2-10d, e, f, and g), the combination of expanded highway width, flyover structures, and reduction in existing tree stock will have visual and aesthetic impacts to the local community with the potential to substantially *degrade the existing visual character or quality of the site and its surroundings* (CEQA Checklist Item I.c.). The report characterizes visual quality rating from the Redwood Highway frontage to be low or mostly moderate/average. The principal thoroughfare for the public in this area, whether on bike, foot, or in a vehicle, is along the frontage road, adjacent to the Highway, which provides well-defined views towards Mt. Tamalpais and the surrounding hills. The combination of the built environment with these natural features provides a striking juxtaposition for everyday travelers in this area. The intrusion of high solid walls and flyover ramps will block views of Mount Tamalpais and surrounding hills to the west, as well as obscure views of greater Larkspur and Corte Madera. This will not only have the potential to impact the visual character and commercial viability of the community but will visually separate and isolate the community from greater Larkspur and Corte Madera, as discussed in more detail under *Land Use and Planning* below.

2. Also of concern is that the photo-simulations include graphic representations of plantings and trees, although no preliminary planting plan or tree replacement plan is identified. The only mitigation is that Caltrans comply with the Larkspur Heritage Tree Removal Ordinance, which may require replacement of only two heritage trees identified in that area. Larkspur remains concerned that lack of landscape area and lack of future maintenance may limit viable tree replacement options and exacerbate the visual impact of infrastructural improvements upon the local community.

We request that an EIR be prepared to thoroughly analyze the extent of tree removal and landscape replacement options, mitigations measures for future maintenance to be implemented, and include consideration of project alternatives to reduce visual obstructions and separation of the Redwood Highway community.

Land Use and Planning

The CEQA Evaluation Checklist Item X(a) asks "*Would the project physically divide an established community?*" Larkspur strongly disagrees with the conclusion that the project would result in 'No Impact' to the community in this manner. Despite the current presence on the eastern side of Highway 101, the Redwood Highway area (containing two mobile home parks, Greenbrae Boardwalk homes, industrial and commercial uses) is physically, economically, and psychologically connected to the communities of greater Corte Madera and Larkspur to the West of Highway 101. Convenient bicycle and pedestrian access across Highway 101 is currently available from both the pedestrian overcrossing and the Wornum Avenue undercrossing (with only two intersection crossings). Standing at grade, the communities are readily visible to one another across the current freeway. Larkspur believes that the project will have the affect of dividing the Redwood Highway area from greater Corte Madera and Larkspur for several reasons:

1. There are numerous businesses, 215 mobile home sites and 52 homes on the Greenbrae Boardwalk, north of the pedestrian overcrossing at Industrial Way. Elimination of the overcrossing will require bicyclist and pedestrians from these locations to proceed approximately one-half mile further south to cross Highway 101 at the Wornum interchange. Residents and businesses at the south end of Redwood Highway are already within walking distance of the existing locations and are no better served by the relocation of the bus stops. This will particularly affect alternative transit modes for teenagers attending Redwood High School. The majority of comments from the local public, representatives of the Marin County Bicycle Coalition, and public officials have expressed the position that the proposed project will simply make it more difficult, inconvenient and uncomfortable for bicyclists and pedestrians to cross Highway 101 from these locations.

2. Widening of the highway by several lanes and the addition of flyover ramps on both sides of the Wornum Avenue interchange will both physically and visually obstruct the connection between the two areas, exacerbating the isolation of the Redwood Highway area from greater Larkspur and Corte Madera.

Public Services

1. As discussed under *Transportation and Circulation* below, it appears that the project may result in reconstruction of the Wornum Drive overpass and certainly the undercrossing. Caltrans and TAM should clearly identify if during construction Wornum Drive can allow traffic control and emergency access, or if would likely be closed for periods of construction. Although the MND indicates that local police and emergency services would be notified in advance of construction activities and detours (page 2.1-2), the closure of Wornum for periods of time would have significant impacts on local traffic patterns and response times.

2. Although the MND indicates that the project goal to reduce congestion will help emergency crews reach Highway 101 destinations faster (Page 2.1-2), the project will reduce local response times to the stretch of Highway 101 from the south end of the Greenbrae interchange to the Wornum Drive overpass. The Greenbrae Fire Station #15 is currently able to access all southbound lanes of the Highway immediately south of the Greenbrae interchange. Under the proposed design, the Greenbrae Station would not

be able to access accidents until after Wornum Drive. It will be necessary for San Rafael to respond to accidents along this stretch of the corridor. The MND should clearly analyze response times for accidents within the project area.

3. The Larkspur Fire Department also reports that after the closure of the southern portion of Nellen Drive, response times from Greenbrae Station to the Redwood Highway area increased by approximately 60 seconds. As discussed below, the City of Larkspur is concerned that the routing of northbound and southbound traffic to a singular Wornum Drive interchange may increase local traffic congestion at that location and, therefore, further affect local emergency response times to the Redwood Highway area. The MND should thoroughly analyze the effect on emergency response times for local jurisdictions, particularly where the traffic congestion may increase at local roadways and intersections.

Transportation/Circulation

1. The City of Larkspur is concerned that the MND understates the potential impacts to traffic on local streets, particularly Redwood Highway and Tamal Vista Boulevard, which provides access to the Redwood Highway area. It is not clear that Wornum Drive would provide adequate storage for all vehicles that would be using the proposed interchange, increasing back-up queues onto the local roadway system. It appears that the project report presents different proposed cross-sections for Wornum Drive. The Jacobs Engineering Plan shows 3 eastbound lanes and a total street/bike lane/sidewalk width of about 70 feet. The Fehr+Peers traffic study indicates 2 eastbound lanes and a total width of about 100 feet. Under either design, it seems likely that entire overcrossing would have to be rebuilt. The project description does not appear to include this major disruptive work.

   The design of Wornum Drive has a direct affect on the operation of Redwood Highway with Wornum Drive. The proposed Highway 101 northbound off-ramp at Wornum would be located less than 100 feet west of the local street intersection.

2. A detailed queuing analysis is presented that finds the maximum left turn queues at the Wornum Drive / Redwood Boulevard intersection would exceed the available queue capacity under the Build Alternative in 2015 and 2035. It is not clear if this analysis accounts for the need to extend the northbound Wornum off-ramp signal green time in order to clear the anticipated queue that could extend onto the freeway from Wornum. More green time for the off-ramp intersection would be longer queues at Wornum / Redwood. Larkspur requests that a thorough analysis of the potential back-up from expanded green times be provided.

3. Elimination of the overcrossing will negatively impact transit users in the Redwood Highway area. North of the overcrossing at Industrial Way, there are numerous commercial and industrial businesses, 215 mobile home sites, and 52 homes on the Greenbrae Boardwalk. Although this is not discussed in the MND and technical and/or technical studies, the project will shift transit system connections almost one-half mile further south from the majority of residents and businesses in the Redwood Highway area. Accepted studies indicate that the majority of potential transit users will not walk more than one-half mile to use transit (Metropolitan Transportation Commission Resolution No. 3434; 2006 Transit-Oriented Development Policy Interim

Evaluation). We note that the project includes lane improvements at the Larkspur Landing off-ramp to accommodate an adequate multi-use path to cross Corte Madera Creek. However, the route remains equally circuitous to bus stops proposed below the Greenbrae interchange, even with the implementation of the Central Marin Ferry Connection project. As discussed below, the functionality of bus stops at these intersections has not been fully explained.

4. Supplemental presentation materials from TAM indicate that 67% of users of the pedestrian overcrossings are transit users. It has been indicated in presentations that the project will benefit transit users by reducing the distance between bus stops across Highway 101. Although we agree that the majority of the users of the overcrossing may be transit riders, the documents fail to demonstrate how the project, by moving the system connections approximately one-half mile further south, will actually improve transit access for bicyclists and pedestrians. Further, the studies do not confirm that transit users actually travel from one bus stop to another in this location and do not explain any logical need for a transit rider to switch between the northbound and southbound directions on Highway 101. Larkspur fails to see why the arrangement of the two bus stops in relation to each other should take any precedence over making the stops as accessible as possible to the adjacent neighborhoods and commercial uses. Further, focusing the crossing at the Wornum interchange will force both pedestrians and bicyclists onto numerous crosswalks at both busy intersections and on- and off-ramps. The majority of comments from the local public, representatives of the Marin Bicycle Coalition, and public officials, have expressed the position that the proposed project will simply make it <u>more difficult, inconvenient and uncomfortable</u> to get across Highway 101 from these locations.

   Larkspur acknowledges that the project will include numerous bike and pedestrian improvements and supports these measures. We further understand that the project is complex and there are no easy solutions to addressing all the project goals and needs. However, the proposed document does not adequately explore the negative impacts of eliminating the pedestrian overcrossing and routing all bike and pedestrian travel through the proposed Wornum interchange.

5. In our response to the NOP in 2009, the City of Larkspur questioned whether the bus stops proposed underneath the Highway 101 / Sir Francis Drake Boulevard interchange would feasibly be accessible to pedestrians and disabled persons in wheelchairs. The document fails to address these concerns. Although Larkspur has adopted a Complete Streets policy and supports the development of transit infrastructure to serve local residents and users, we are concerned that the functionality and purpose of these stops have not been adequately analyzed:

   - Located within a built interchange of on- and off-ramps and an arterial thoroughfare, the locations lack comfort and convenience to attract transit riders.
   - There is no apparent access from the west side of Highway 101 or the south of Corte Madera Creek without following an egregiously circuitous route using the future Central Marin Ferry Connection overpass.
   - From the Larkspur Landing area, the only community within ½ mile walking distance, the access under Highway 101 is obstructed by a high retaining wall and

embankment that abuts the travel lanes on Sir Francis Drake Boulevard. It is unclear in the project description whether this condition is recognized and whether it is intended that the several feet of retained earth be removed and the path of travel be removed from adjacency to the vehicle lane, or whether it is intended that the path of travel cross over existing grade levels below the Highway.

- The northbound on-ramp and southbound off-ramp are located on unusually steep grades for such infrastructure. The document does not identify the grade at these ramps, whether the bus stops at these locations can function at ADA accessibility standards, or whether the Golden Gate Bridge and Highway Transportation District has agreed to the design acceptability of these stops within the interchange. **Note:** The discussion on 'Transit Condition' on page 2.2-42 confuses this issue by indicating both that there *'are regional bus stops located along Sir Francis Drake Boulevard'* and *'there are no regional bus stops at Sir Francis Drake Boulevard'* in the same paragraph. It is unclear if this simply an error or a discrepancy between locations along the Boulevard or a lack of routes.

Larkspur requests that the project analysis clearly analyze the feasibility and functionality of these improvements, particularly as these are part of system-wide improvements that justify removal of existing pedestrian overcrossing.

6. The discussion on parking (pages 2.2-42 thru 2.2-44) indicates that in the frontages along the north extent of the project (Figure 2-8) up to 58 out of 180 parking spaces would be lost. Many of these parking spaces serve commuters and to a lesser degree local businesses and residents. The report seems to conclude that loss of parking is 'insubstantial' due to this surplus of parking. The report assumes that the local commercial and office uses have adequate parking to absorb this loss of parking without providing any survey data to support this conclusion. Be advised that the Cost Plus shopping center is currently under-parked, and most industrial uses in the area do not have adequate parking to absorb the loss of street parking to the north.

   Regardless of the supply of 'surplus parking', Larkspur is concerned that the project understates the impact to available commuter parking in the project area. Figure 2-8 demonstrates that the project will result in the loss of 132 parking spaces within walking distance to bus stops and the overpass. The project would provide approximately 65 spaces near the relocated bus stops at the Wornum Drive Interchange. There is no other street parking in or near this area, nor is there an availability of excess parking on commercial and office sites (unless the Department of Motor Vehicles becomes a park and ride lot). As the 17 parking spaces proposed on Redwood Highway are more than a one-half mile from proposed bus stops, the project would effectively reduce commuter parking serving these bus stops by 67 spaces. While loss of parking is, in itself, no longer considered a potential significant impact under CEQA, the imposition of such loss could impact exacerbate existing non-conforming conditions and reduce the economic viability of commercial uses in the area (economic and land use impacts). Additional traffic is generated by commuters, customers, and residents circling the area in search of parking spaces. Moreover, the loss of commuter parking may discourage use of transit, contrary to the Complete Street policy recently adopted by the City of Larkspur, per the guidelines of the Metropolitan Transportation Commission.

7. Numerous parking spaces serving businesses located along the Redwood Highway frontage will be lost either through private property acquisition and/or infrastructure

improvements. Although the study indicates that the project will only temporarily affect 11 parking spaces at Cost Plus Plaza, it appears that the project will alter frontage circulation and parking for the several businesses north of Industrial Way. From the small-scale graphic provided (Figure D-2), it is impossible to discern the impact of the project upon these properties. As discussed above, the reduction in parking and/or convenient access can have economic, land use, and parking impacts on commercial and residential uses in the community. Larkspur requests that a more detailed description and graphic depiction of the impact to parking and circulation patterns for these properties be provided, particularly in light of the loss of street parking that would occur along the frontage roads.

Hydrology/Water Quality

The northern reaches of the project in and around the Redwood Highway area are located within the FEMA Zone AE special flood hazard zone. The Highway and surrounding residential and commercial uses are subject to flood during combination high tide / storm events and flood conditions are likely to become more frequent in coming decades due to sea level rise. Despite the extensive scope of the project, there is no proposal to address flooding on this segment of the Highway in any manner, and indeed actually proposes expanding infrastructure within Zone AE. Larkspur is concerned that the study understates the impact of flooding on the surrounding community, particularly from expansion of impervious surfaces into the Redwood Highway area to the east of the Highway. The study indicates that the flooding in the area is due primarily to tidal action and that the expanded surface area of the Highway would equal only 0.03% of the flow of Corte Madera Creek. Despite this being a seemingly small percentage relative to the flow of the creek, it is unclear how that relates to the potential affect on the immediately adjacent communities. It is often the combination of storm water and tidal action that contribute to flood events. As part of our SMART Station Area Plan process, the City of Larkspur is currently analyzing infrastructure challenges in this area and will be developing mitigation and adaptation strategies to address sea level rise. The proposed mitigations in the MND refer to future identification of strategies to address potential flood impacts, but provide no clear or objective standards by which to implement those strategies. A detailed drainage analysis and hydrology study must be provided to assure that adequate infrastructure is installed to avoid exacerbation of flood conditions in adjacent neighborhoods. An analysis of hardened protection should be considered to supplement future flood control measures within the surrounding built environment.

<u>Conclusion</u>

In conclusion, Goal 1 of the Circulation Element of the Larkspur General Plan states: *Regard the Quality of Life in Larkspur as more important than mobility of traffic.* The goal narrative goes on to state: *While almost any traffic problem can be solved, some solutions create conditions detrimental to other important aspects of the quality of life.* Larkspur supports the efforts of Caltrans and TAM to reduce congestion and improve safety on this section of highway, which certainly needs improvement. However, we also believe that the project requires the greater analysis and scrutiny of an EIR in order to consider all viable alternatives to address both perceived and real impacts to local communities while achieving the project goals.

As the initial purpose of this project was to improve connectivity from Highway 101 to I580 and the Richmond-San Rafael Bridge, we encourage TAM and Caltrans to continue to study project alternatives that achieve that initial goal.

Thank you for the opportunity to comment on the Initial Study with Mitigated Negative Declaration and Environmental Assessment for the Greenbrae/Twin Cities Corridor Improvement Project. Should you have questions regarding land use issues within the City of Larkspur, please contact me at (415) 927-6713. For traffic/circulation questions, please contact our Public Works Director/City Engineer, Mary Grace Houlihan at (415) 927-5017. We look forward working in conjunction with TAM on developing a sub-committee comprised of local officials to review these issues and develop alternative solutions to reduce impacts to the local communities.

Sincerely,

Neal Toft
Director of Planning & Building

C: Dan Schwarz, City Manager
Mary Grace Houlihan, Public Works Director / City Engineer
Bill Whitney, TAM Project Manager
David Bracken, Town of Corte Madera

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February 14, 2013

Sent via email to Valerie_Shearer@dot.ca.gov

Valerie Shearer, Senior Environmental Planner
Caltrans District 4
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

Dear Ms. Shearer,

On behalf of Marin Transit, the local transit provider in Marin County, I am submitting the following comments on the Highway 101 Greenbrae/Twin Cities Corridor Draft Environmental Document.

We have met with the project team on prior occasions to discuss the feasibility of transit alternatives (including pedestrian access and intermodal transfer opportunities). One of the key transit benefits of the build alternative will be to locate new bus stops in closer proximity to the Larkspur Ferry Terminal and the future Sonoma Marin Rail Transit (SMART) Station with improved pedestrian and ADA accessibility. In addition, the project proposes to improve pedestrian access between bus stop locations on either side of the highway.

The document states that the "Build Alternative will be constructed in multiple stages in order to minimize traffic delays and congestion caused by construction activities. The exact staging of the construction phases will be determined during the final design process" and that a Transportation Management Plan will be developed for use during construction. Marin Transit requests that Caltrans and TAM include the transit operators, Marin Transit and Golden Gate Transit in the Transportation Management Plan process and implementation. This is necessary to ensure that transit services are provided as effectively as possible as each stage of construction is planned and conducted.

In addition to identifying current and future bus circulation at each stage through project completion, the Plan will need to also provide accommodations for transit passengers through maintaining safe access and directional and informational signage. When implementing System Management techniques, Marin Transit requests that Caltrans and TAM again work with the two operators to determine what if any improvements to signalization would benefit transit services within the overall project.

The project's Transportation Demand Management Alternatives need to also emphasize and promote transit alternatives for travel through the corridor during and after construction. The document only discusses rideshare programs.

Thank you for the opportunity to comment on the draft environmental document. Please do not hesitate to contact me if you have any questions or to schedule a meeting at 415 -226-0859.

Sincerely,

Amy Van Doren

Amy Van Doren
Director of Policy and Legislative Programs

cc: David Rzepinski, Marin Transit General Manager
Marin County Supervisor Katie Rice
Bill Whitney, Transportation Authority of Marin Project Manager

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CalTrans District 4 Senior Environmental Planner Valerie Shearer
Office of Environmental Analysis, MS8-B
P.O. Box 23660
Oakland, CA 94623-0660

January 30, 2013

Re: Opposition to Proposed Highway 101 Freeway Greenbrae Corridor Improvement Project

After reviewing the Transportation Authority of Marin (TAM) Environmental Review and attending the public meeting on Tuesday January 29, 2013 I would like to register my opposition to the proposed project. I acknowledge the sincere and detailed effort on the part of staff, but the project is unacceptable. My concerns with the inadequate environmental review and report include:

1. Construction impact on wildlife including river otters and bird life.
2. Minimization of the negative impact on the cherished views of Mount Tamalpais
3. The additional range of the noise of the 27 to 33 foot fly over—the current freeway noise is blocked by buildings. Also no depictions or of the potential seven sound barriers were given.
4. In the verbal report, flood mitigation was brushed aside as not being in the scope of the project.
5. Construction Impact: No detail of the duration of the construction project was given. No detail of the construction noise, traffic impacts, detours were given.
6. Wornum bike/pedestrian path: I agree with speakers who objected to the removal of the existing pedestrian overpass and voiced concerns about the proposed Wornum alternative.
7. The recently approved WinCup residential project did not seem to be included in the analysis.
8. The accident rate for this interchange is lower than the state average. Suggestions for minor possible improvements were not addressed in this report.
9. This project would further divide the community.
10. This project would significantly have a negative impact on the existing character of the vicinity changing it from a small town feeling to a highly urbanized one contrary to regional and local objectives in local and regional planning documents.
11. This project would physically degrade existing recreational opportunities by making Corte Madera boating, biking and walking less attractive with the removal of the pedestrian walkway and installation of the dominating high flyover where none exists now.

Daphne Markham

Daphne Markham

CC: TAM Project Manager Bill Whitney (415) 226-0823; bwhitney@tam.ca.gov

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February 5, 2013

Caltrans District 4
Att: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

Dear Ms. Shearer,

After reading the project proposal and draft EIR, attending the TAM public meeting and the Caltrans public hearing at Redwood High School, I have the following comments:

The Proposed Mitigated Negative Declaration/Environmental Assessment with the project proposal, should NOT be accepted as a negative declaration, and the ;proposed project should be altered for improved design and project goals.

Contrary to the statements within the assessment, there are:

1) SIGNIFICANT visual impacts of the design beyond acceptable standards for the community.
    a. Height of flyovers is excessive for this area. These proposed flyovers match the 580 flyover in a much more urbanized area.
    b. Retaining walls and the typical construction methods are overwhelming visual impacts to the area.
    c. Significant increase in road lanes, widening out into view planes and crowding of nearby structures.
2) Altered traffic patterns creating new congestion on side streets.
    a. Wornum Drive is intended in the new design to handle significant increase in entry, exit and pass-through traffic creating a new congestion area.
    b. The proposed layout matches the Bellam/580 overcrossing in size and number of crossings. Highly inappropriate for this area.
    c. Forcing bicycles and pedestrians into this traffic choke point is unsafe, ineffective in routing this mode of movement and reflects a poor design effort.
3) Failure to address traffic congestion on Sir Francis Drake Blvd.
    a. The proposed design still provides 1 lane exit NB on 101 to SFD. This IS the congestion point for NB 101 exiting traffic that backs up south on 101.
    b. SFD should be 4 lane all the way past San Quentin onto 580 and the Richmond bridge. Daily, this is a slowdown of significance that must be addressed to move traffic through the area.

4) Poor bicycle and pedestrian planning which results in a LOSS of access for these modes of movement.
    a. Loss of the existing over crossing and direct east-west without getting into traffic mix is a significant step backwards in transportation planning.
    b. Loss of more direct access to the Cal Park Tunnel.
5) More difficult public transportation access.
    a. Loss of over crossing to bus stops, forcing a walk of 1/4 to 1/2 mile, per trip, is a huge setback to bus access.
6) Failure to address PRESENT INCREASING local traffic requirements.
    a. Increased housing AT the Wornum Drive/Tam Vista intersection under construction.
    b. New housing on Doherty Drive in Larkspur will also increase demand on the Wornum drive interchange.
    c. Marin Country Mart traffic is increasing monthly.
    d. Ferry traffic is increasing and being encouraged.
7) Failure to address FUTURE INCREASES to the local traffic loads.
    a. New houses being built on SFD east of Marin Country Mart.
    b. Proposed development at Ross Valley Sanitary District land on SFD.
    c. SMART train terminal SHOULD HAVE planning for direct bicycle and pedestrian access. This should be a PRIORITY of the TAM staff, AND Caltrans considerations.
8) The additional environmental aspects of the report that are considered mitigated or negative should be rejected.
    a. Marshland fill proposed for ramps. There is NO certain plan to replace these areas.
    b. Loss of access during construction is a significant issue that needs to be addressed by construction planning and temporary structures.

While I have witnessed dozens of effective Caltrans projects around northern California, this is not a well conceived design, while apparently wrought out with many considerations. Having traveled this specific area daily for many years, the following should be the solutions to consider.

1) Widening the SB 101 exit and entrance ramps south of Corte Madera Creek as proposed.
2) Two lane SB entry from SFD as proposed.
3) Two lane NB exit from 101 to SFD. Widened yes, flyover no.
4) NO exit or entry ramps at Wornum. No flyover.
5) NEW bicycle over crossing connecting east-west and to SFD, SMART and use the old trestle location to cross to Cal Park Tunnel.
6) Widen SFD at San Quentin.

Respectfully,

Peter Chase

MARIN MUNICIPAL
WATER DISTRICT

220 Nellen Avenue Corte Madera CA 94925-1169
www.marinwater.org

February 8, 2013

Caltrans District 4
Attention: Valerie Shearer, Senior Environmental Planner
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

RE: Comments on the Adequacy of the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Initial Study/Environmental Assessment

Dear Ms. Shearer:

The Marin Municipal Water District (MMWD) has reviewed the Draft Initial Study/Environmental Assessment (IS/EA) for the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement Project (project) and appreciates the opportunity to submit the following comments, which are focused on the document's adequacy under provisions of the California Environmental Quality Act (CEQA) as it pertains to MMWD facilities and properties. Our understanding of the project was enhanced thanks to presentations to our staff and Board of Directors by Bill Whitney and the Transportation Authority of Marin project team.

Project Description

MMWD's administrative offices are located at 220 Nellen Avenue, Corte Madera. The Draft IS/EA makes no textual reference to the elimination of Nellen Avenue. Figure 1-2 schematically illustrates the proposed project and labels project area features and facilities that would be added, modified, and eliminated with project implementation, such as the Highway 101 pedestrian overcrossing. Figure 1-2 does not label the existing Nellen Avenue nor indicate that it would be eliminated with project implementation.

The only point of public access to MMWD's administrative offices is from the Nellen Avenue side of the building, and Nellen Avenue now serves as the principal point of vehicular, bicycle, and pedestrian access to the building for non-employees, including customers, visitors, vendors, contractors, and small-parcel deliveries. The Draft IS/EA does not mention this fact or the site revisions that would be required to provide an alternative safe access route for these groups from the Tamal Vista Boulevard side of our site.

Implementation of the project could result in the elimination of one or more parking spaces within the District's Nellen Avenue frontage parking lot due to project right-of-way acquisition, a fact not described in the Draft IS/EA.

The omission of a clear and concise statement regarding the elimination of Nellen Avenue as part of the project description and the corresponding absence of an adequate analysis of impacts associated with that elimination represents a significant deficiency of the IS/EA. Absence of a specific statement concerning the elimination of Nellen Avenue precludes a

recycled
recyclable

thorough understanding of all of the project's elements, and as such, clouds the ability of the general public, other public agencies, and decision-makers to make a fully informed decision regarding the proposed project.

Secondary Project impacts

Elimination of Nellen Avenue would produce a series of secondary environmental impacts for MMWD's site, none of which are addressed in the Draft IS/EA:

On-Site Circulation

Today, the principal path of access to the District's administrative offices for our customers, visitors, vendors, contractors, and small-parcel deliveries is from Nellen Avenue. Elimination of Nellen Avenue would require that all customers, visitors, vendors, contractors, and small-parcel deliveries to MMWD's administrative offices enter and exit the site from Tamal Vista Boulevard. This would represent a significant increase in traffic through the site as well as additional turning movements at the two Tamal Vista Boulevard driveways. None of these facts were disclosed in the Draft IS/EA nor analyzed as part of the technical studies prepared to support the Draft IS/EA.

The vehicular path from the Tamal Vista Boulevard side of the site to the Nellen Avenue frontage is via a 19-foot wide drive aisle that has impaired vertical clearance (roof overhang) and which was originally intended for one-way traffic flow. Project implementation would require that the drive aisle be widened to a minimum pavement section of 20-feet to allow for the safe movement of two-way traffic. Removal of the existing vertical impairment is not practical, so the widened drive aisle would need to be shifted away from the building. Widening the drive aisle would require the removal of mature vegetation, including several mature trees and would also require elimination of up to 9 on-site parking spaces along the western end of the drive aisle. None of these facts were disclosed in the Draft IS/EA nor analyzed as part of the technical studies prepared to support the Draft IS/EA.

Emergency Access

Emergency fire and medical services currently access the MMWD site from both Nellen Avenue and Tamal Vista Boulevard. Elimination of Nellen Avenue would require on-site modifications to accommodate emergency service access to the Nellen Avenue side of the site, including but not limited to:

- Widening the drive aisle on the north side of the building
- Widening the turning radius at the intersection of the north-side drive aisle and the Nellen Avenue frontage parking lot drive aisle.
- Replacing a gate at the secured District parking area on the south side of the building with a gate that can be operated by the fire department to allow through movement of emergency vehicles.
- Widening the turning radius at the intersection of the south-side secured parking area and the Nellen Avenue frontage parking lot.

Elimination of Nellen Avenue could slow emergency response times to the Nellen Avenue frontage due to the need for service providers to traverse a potentially congested parking lot and drive aisle from the site's Tamal Vista Boulevard frontage due to the elimination of Nellen Avenue.

Review of the Draft IS/EA and its supporting documents revealed no analysis of project impacts on the delivery of emergency fire and medical services to MMWD's administrative offices.

Public Safety

The Twin Cities Police Authority is now able to provide surveillance of the District's Nellen Avenue frontage from Nellen Avenue. Elimination of Nellen Avenue with project implementation would effectively eliminate the opportunity for surveillance along the site's eastern exposure, raising the potential for vandalism and other criminal acts.

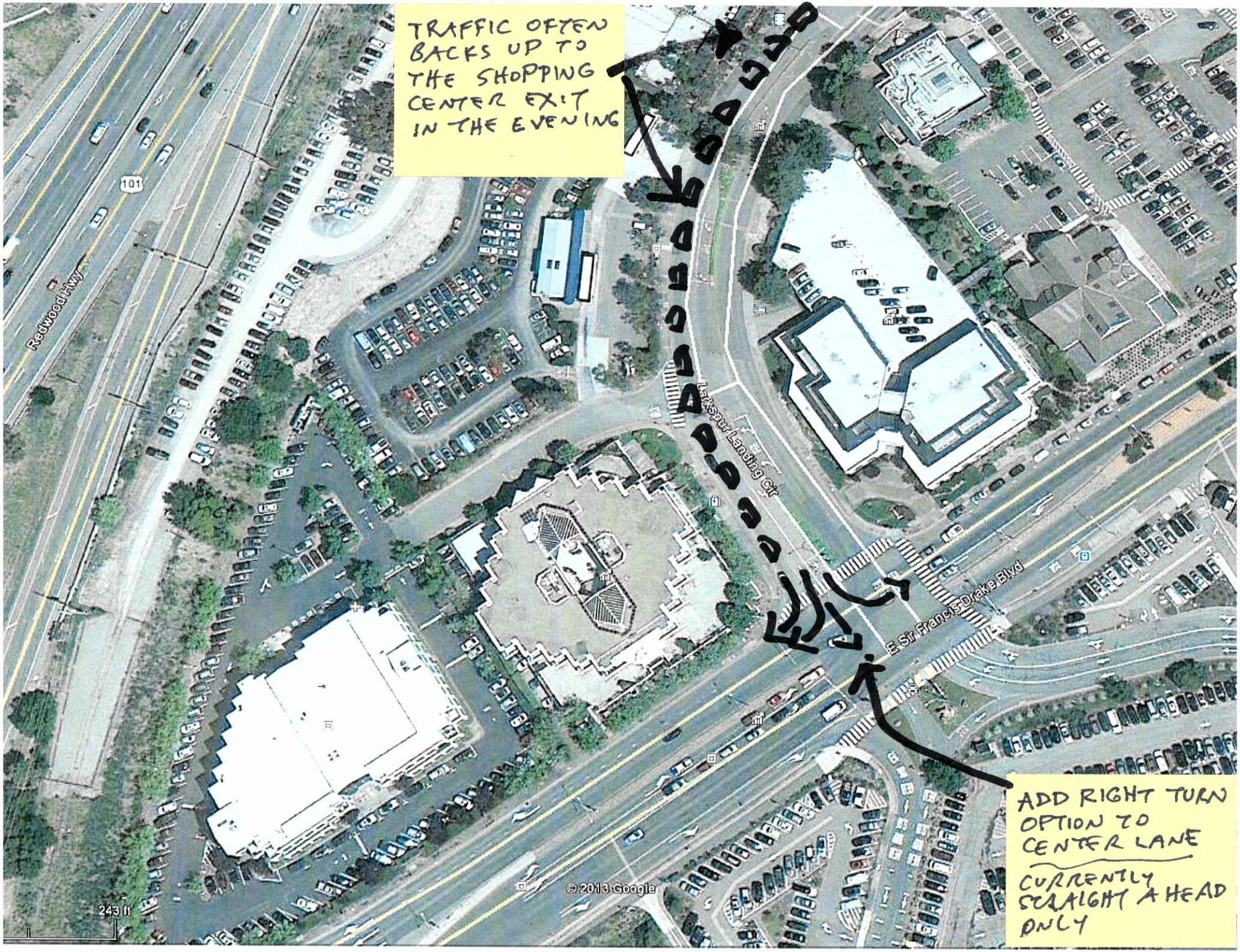
Review of the Draft IS/EA and its supporting documents revealed no analysis of project impacts on the delivery of public safety services to MMWD's administrative offices.

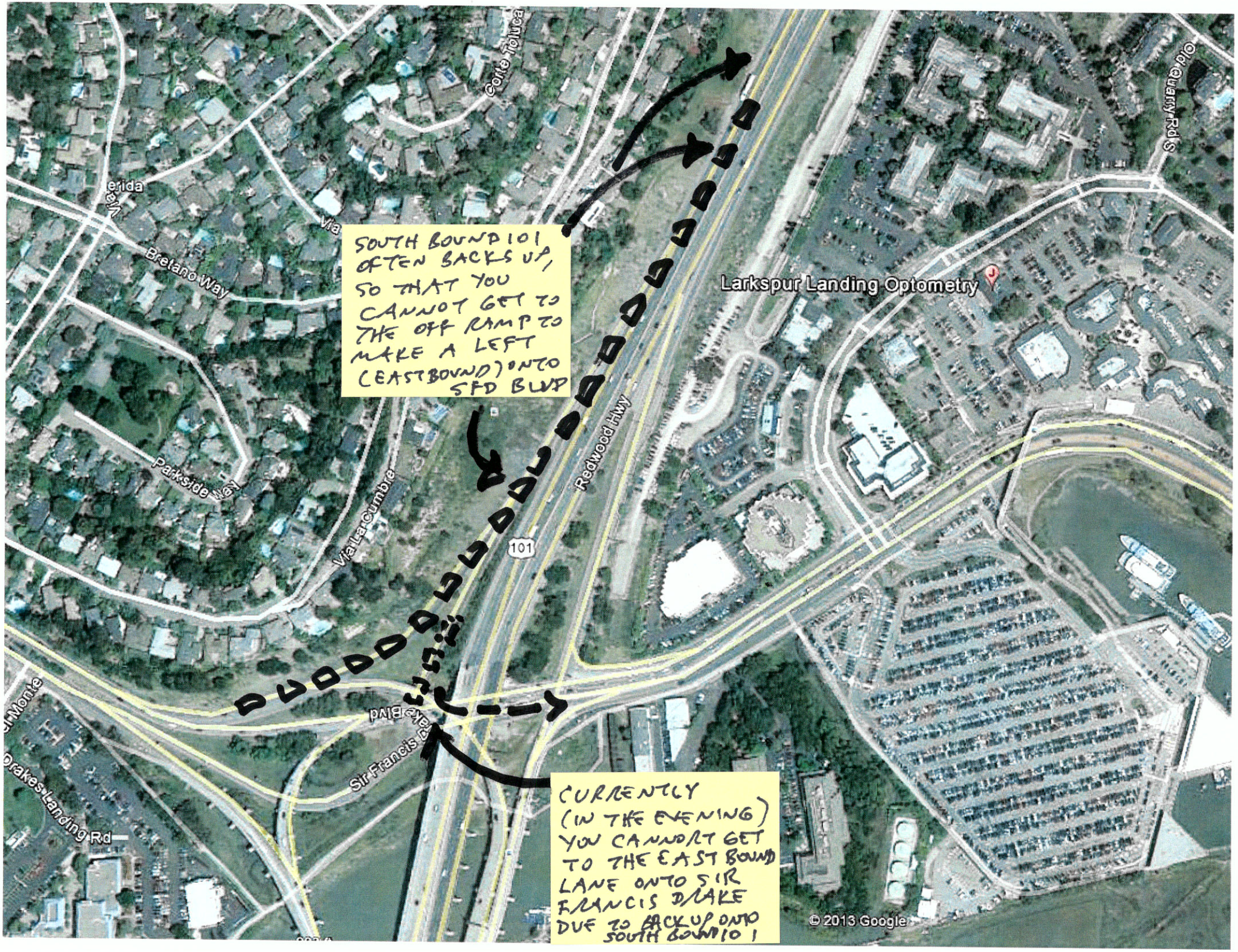
The District's review of the Draft IS/EA from the perspective of an impacted property owner concluded that the document does not comply with the California Environmental Quality Act from the perspective of providing a clear, concise, and accurate description of the whole of the project, and does not address all primary and secondary impacts that would occur as a result of project implementation. The District looks forward to the opportunity to review a legally adequate and complete environmental document prior to action on the proposed project. Please contact me at (415) 945-1586 or via email at danderson@marinwater.org should you have any questions regarding our comments.

Sincerely,

Dain Anderson
Environmental Services Coordinator

cc: Board of Directors
Krishna Kumar, General Manager


TRAFFIC OFTEN BACKS UP TO THE SHOPPING CENTER EXIT IN THE EVENING
101
Redwood Hwy
Larkspur Landing Cir
E Sir Francis Drake Blvd
© 2013 Google
243 ft
ADD RIGHT TURN OPTION TO CENTER LANE
CURRENTLY STRAIGHT AHEAD ONLY


SOUTH BOUND 101 OFTEN BACKS UP, SO THAT YOU CANNOT GET TO THE OFF RAMP TO MAKE A LEFT (EASTBOUND) ONTO SFD BLVD
CURRENTLY (IN THE EVENING) YOU CANNOT GET TO THE EAST BOUND LANE ONTO SIR FRANCIS DRAKE DUE TO BACKUP ONTO SOUTH BOUND 101
Larkspur Landing Optometry
Redwood Hwy
101
Bretano Way
Parkside
Via La Cumbre
Sir Francis Drake Blvd
Drakes Landing Rd
Old Quarry Rd S
Conte Tolluca
© 2013 Google

From: Linda Jackson
To: Bill Whitney
Subject: FW: Message from TAM Website Email Form
Date: Monday, February 11, 2013 10:24:02 AM

Not sure who to send this to, so I'll send it to you...L

-----Original Message-----
From: WebForm@tam.ca.gov [mailto:WebForm@tam.ca.gov]
Sent: Sunday, February 10, 2013 12:26 PM
To: Linda Jackson
Subject: Message from TAM Website Email Form

Submission information

Submitter DB ID : 751
Submitter's language : Default language
IP address : 70.231.236.8
Time to take the survey : 4 min. , 29 sec.
Submission recorded on : 2/10/2013 12:26:27 PM

Survey answers

Your name: (First Name and Last Name) *
Shelby
van meter

Email address: *
cloudv4@pacbell.net

Question or Comment: *
I AM TOTALLY OPPOSED to the unnecessary,moverly grand, overly expensive construction project on the Larkspur/Cort Madera stretch of Hwy 1. Please be couragous enough to stop now. Shelby Van Meter, Sausalito

From: George & Lois Davison
To: Bill Whitney
Subject: Greenbrae-Lucky Drive interchange
Date: Monday, January 28, 2013 7:43:28 PM

Hello Bill,
I follow with interest your efforts on the latest plan for this interchange. I worked for Caltrans in 1955-1964 in North Bay Design on 101 and 37 in Marin, as well as 101 north of Santa Rosa. We didn't envision future traffic volumes that we now have, so many of the interchanges we designed have had to be revised. This one is no exception. The weaving movements on both sides are yesteryear's design, After seeing the article and pictures in today's Marin IJ, I downloaded the plan map on your website and digested it thoroughly. Based on my design experience, and the fact that I drive it frequently, I am of the opinion you and Caltrans designers have done the best job possible with limited space, bay mud for foundation, and high traffic volumes interchanging between SFD Blvd. and 101.
The existing pedestrian overcrossing was built in order to provide direct access to the bus pads. As I recall, Wornum Dr. didn't exist in those days. That structure was to cross the NWP tracks, which were still in use then. Your plan seems to have plenty of local circulation for peds and bicycles and I can't see any reason for replacing the ped overcrossing.
The picture in the IJ that shows the west side elevated ramp is taken from a very unflattering angle. A better view would be from farther away and a little higher to show it in respect to the buildings and topography alongside the freeway. It doesn't dominate when looked at along with the Greenbrae part of the interchange. A scale model of the project would help also.
I hope you can get this job into construction. I know it will increase the safety out there. I always have to be careful in those weaves to avoid drivers who cut in and out.
Regards,
George Davison
Civil Engineer, Woodacre
NOTE: I have no problem if you want to include my comments in the appropriate record during the remaining EIR process.

RECEIVED

JAN 3 0 2013

Transportation Authority of Marin

KARL J. HITTELMAN
4 Pleasant Avenue
Corte Madera, CA 94925-1615

28 January 2013

Commissioners
Transportation Authority of Marin
781 Lincoln Avenue, Suite 160
San Rafael, CA 94901

Dear Commissioners:

I wish to comment on the *Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Environmental Document*, but more importantly on the Project itself. I believe that a realistic project to solve congestion problems in the Greenbrae Corridor would offer many benefits to Marin. I live in this area, and often experience the slow traffic and delays described. But the project proposed in this document will not solve the problem. I base my opinion on three factors.

1. As highly engineered as the proposed project is, it will do nothing to abate problems on Sir Francis Drake Boulevard (SFD) itself, either east or west of US101, and will even exacerbate them. Neighborhoods and traffic on surface streets will suffer as a consequence. But unfortunately, healthy neighborhoods and surface streets are not factors considered here. An overweening attitude of transportation planners seems to be, "Let's just pack 'em on the freeways and get them from A to B as quickly as possible," with no regard to the inevitable collateral damage. This 1950s Southern California species of transportation "planning" has no place in the lives of the residents of Marin County.

For example, by facilitating egress from US101 eastbound onto SFD toward the Richmond-San Rafael Bridge, the project will surely exacerbate existing problems, first in the vicinity of the Larkspur Ferry and the shopping center across SFD, then around San Quentin Prison, where SFD becomes one single lane in width. Westbound SFD will fare no better, as exiting traffic quickly encounters the speed limits and then traffic signals in the vicinity of Bon Aire Shopping Center, Marin General Hospital, and beyond.

Imagine a very busy supermarket that is so crowded in the late afternoon that customers must put up with some delay just to get in the door to shop for dinner. But management thinks that the frustration experienced by people milling around the front doors is bad for business, so the decision is made to widen the doors to improve access. No more cashiers or other staff or services are added – just wider doors. Is this really a solution? Of course not, and neither is speeding exit from US101 onto SFD, either east- or westbound.

2. I am really puzzled by the "solution" that would lessen the weaving on and off of southbound US101 between the SFD on ramp and the Fifer Avenue exit. In fact, this is no solution at all. It merely moves the problem a few hundred meters south where, clearly, the plan shows that in the proposed configuration, traffic attempting to exit at Madera Blvd. will have to weave through traffic

Voice: 415-924-2624 karl@hittelman.net Telefacsimile: 415-924-4812

entering from the new SFD and Fifer Avenue on ramps, traffic that will probably try to enter US101 at higher speeds than occur now.

3. One last matter: safety. Sorry to say, the metric used for Collision Rates (Table 1-1 of Chapter 1) in the proposal means nothing to me. I'm sure that traffic engineers would tell me that using a rate, rather than a frequency, is a superior way of making comparisons. But in terms that I might have an intuitive sense for, what does an accident rate of 1.86 per million vehicle miles mean? Is that awful? OK? Very safe? What's the standard for "safe?" What's the range seen? In terms that an ordinary citizen like me can get a feeling for about accidents and injuries, just how dangerous are those entrances to and exits from US101?

Regardless, it is very important to note that *the fatality figures at the interchanges cited in this proposal – ZERO – cannot be improved upon.* So what's the fundamental problem being addressed by the project described in this proposal – intractable impatience of drivers through the Greenbrae/Twin Cities Corridor? That doesn't seem to me to be a very compelling reason to spend $143 million of taxpayer money, especially considering that there are so many other, more important needs in our County that we know can be addressed successfully, and that will be good for, not deleterious to, Marin's citizens and their neighborhoods.

Respectfully submitted,

Karl J. Hittelman

KJ Hittelman
4 Pleasant Avenue
Corte Madera, CA 94925

OAKLAND CA 945
29 JAN 2013 PM 2 L

Commissioners
Transportation Authority of Marin
781 Lincoln Avenue, Suite 160
San Rafael, CA 94901

94904 339027

LARKSPUR-CORTE MADERA SCHOOL DISTRICT
Building Community

BOARD OF TRUSTEES

Susan Christman
Sheri Mowbray
Sally Relova
Julia Ritter
Philip Wade

January 24, 2013

Mr. Bill Whitney
Associate Project Delivery Manager
Transportation Authority of Marin
781 Lincoln Avenue, Suite 160
San Rafael, CA 94901

Dear Bill:

I'd like to first thank you for attending our recent board meeting and providing a thorough explanation of the Highway 101/Greenbrae Corridor Project.

Since the Trustees have reviewed the project, they've asked that I put in writing their concerns as they relate to safe routes to schools for the District's students. They are as follows:

1) Removal of the east-west pedestrian/bike overcrossing at Lucky/Industrial;

2) Concentration of heavy traffic at Wornum, where pedestrian and bike traffic will also be redirected; and,

3) Lack of improvement to pedestrian/bike paths along Tamal Vista between Madera Boulevard and Tamalpais Drive and at the Tamalpais overcrossing.

We hope TAM will give consideration to these concerns and address them at its upcoming meetings.

Sincerely,

Valerie Pitts, Ph.D.
Superintendent

230 Doherty Drive, Larkspur, CA 94939 415.927.6960 / Fax 415.927.6964 www.larkspurschools.org

RECEIVED

JAN 30 2013

Transportation Authority of Marin

KARL J. HITTELMAN
4 Pleasant Avenue
Corte Madera, CA 94925-1615

28 January 2013

Commissioners
Transportation Authority of Marin
781 Lincoln Avenue, Suite 160
San Rafael, CA 94901

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Respectfully submitted,

Karl J. Hittelman

nonmotorized transportation ie. recreational walkers, bikers who shop, run errands, commuters, day workers, students and athletes & this project will only increase local congestion.

Sincerely,
Ursula Wertz

Letter copies are being sent to
The Dept. of Public Works of Larkspur, Corte Madera
as well as the mayors of each city.

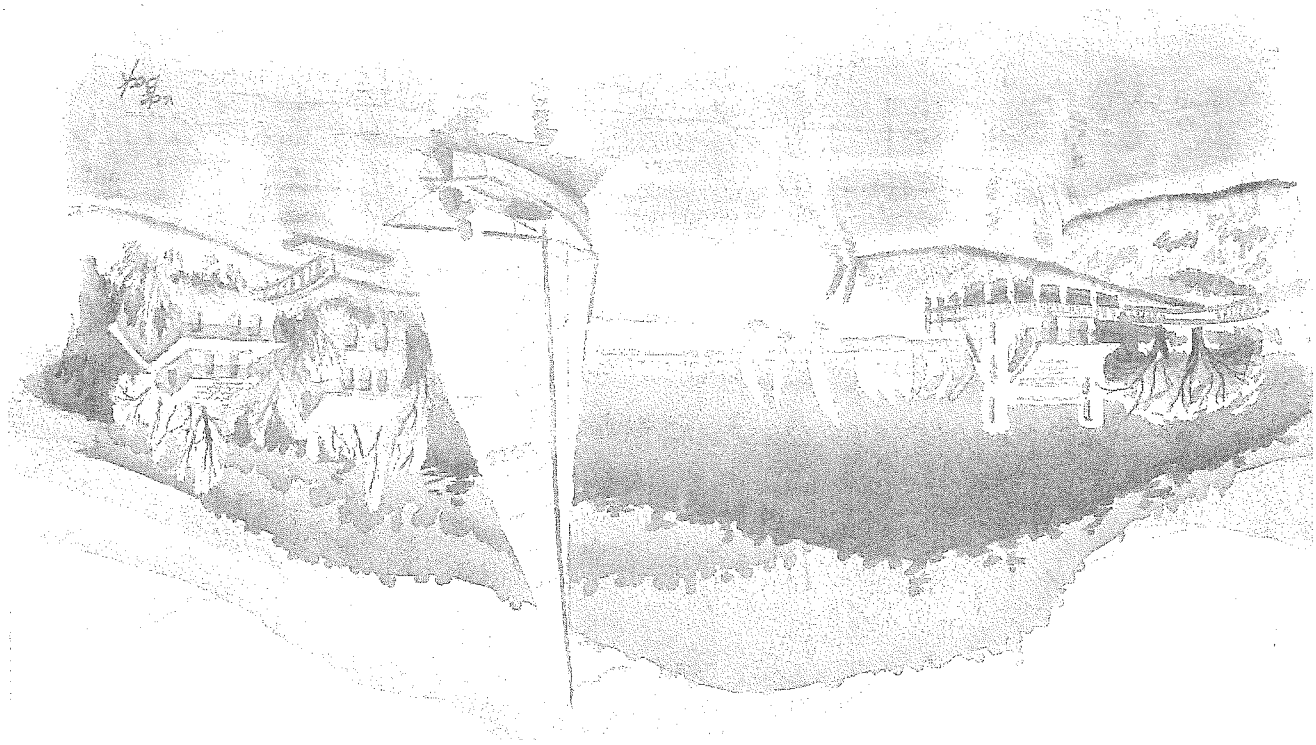
5 January 2013

Mrs. Dir Transportation Authority of Marin
Dianne Steinhauser
781 Lincoln Ave Suite 160
San Rafael, Ca. 94901

RECEIVED
JAN 07 2013
Transportation Authority of Marin

Dear Dianne,

This letter is being written about the concern I have about the Hwy. 101 design between Corte Madera Creek and Wornum Drive. The Hwy 101 plans abolish the pedestrian crossing - overcrossing in Corte Madera. We need the existing pedestrian bicycle of Hwy 101 between Industrial Way and Fifth + Tellan for people who choose not to drive, but rather walk or bike in safety. Do not only consider highway safety to the detriment & discouragement of those using



Ursula Wertz
(415) 924-9177
End of Boardwalk One
Post Office Box 715
Larkspur, California ~~94939~~
94977

nonmotorized transportation ie. recreational walkers, bikers who shop, run errands, commuters, day workers, students and athletes & this project will only increase local congestion.

Sincerely,
Ursula Worthy

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The Dept. of Public Works of Larkspur & Corte Madera
as well as the mayors of each city.

5 January 2013

Mrs. Dir Transportation Authority of Marin
Dianne Steinhauser
781 Lincoln Ave Suite 160
San Rafael, Ca. 94901

RECEIVED
JAN 07 2013
Transportation Authority of Marin

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The Wertz Family
End of Boardwalk One #37
Post Office Box 715
Larkspur, California ~~94939~~
94977-0715

From: WebForm@tam.ca.gov
To: Bill Whitney
Subject: Message from TAM Website Email Form
Date: Wednesday, January 23, 2013 10:38:36 AM

Submission information

Submitter DB ID : 740
Submitter's language : Default language
IP address : 98.248.184.230
Time to take the survey : 0 min. , 30 sec.
Submission recorded on : 1/23/2013 10:37:13 AM

Survey answers

Your name: (First Name and Last Name) *
inka
Benton

Email address: *
jacquie@batnet.com

Question or Comment: *
January 23 2013
To: Planners at Caltrans, Transpo Alternatives of Marin (TAM) and Marin Supervisors (cc Independent Journal and Pacific Sun letters section)

I was grateful to see that the I.J. covered the story about the planned destruction of the pedestrian over-pass (called POC in transit-speak), and the work the Marin Bicycle Coalition intends to do to prevent demolition of the only safe way for non-motorists to get over the dozen or more lanes of a widened Highway 101 at the Greenbrae interchange.
The 148-million dollar improvement will smooth things out for motorists, and lessen hazards for freeway users trying to get on and off at Lucky Drive, Sir Francis Drake, etc. With Caltrans, planning takes at least a decade—why were no cycling engineers consulted?
Why must these safety improvements be at the expense of the non-motorized and sadly under represented public?
Why eliminate an overpass that is already paid for?
There are many creative ways to solve the problem, and reducing options for the young, old, disabled (and growing number of people who want to walk to the Ferry rather than drive) is not the way to go.
Santa Venetia subdivision was planned during the lowest point of bicycle/pedestrian awareness in the County (and the country , for that matter). The result is about 1,400 homes whose residents cannot go west without the use of a car, or the determination to take their chances ducking under the freeway at North San Pedro Road underpass, or the train tracks, or detouring significantly northward, use the motorist overpass.
We need to look to places like Denmark and Holland, whose engineers assume there will be cyclers everywhere, and make access easy and safe for all.
Please re-work your 148 million dollar plan, and add a few more million for a proper walkway over the dozen or more lanes, cloverleaves, etc that you have in mind for the new freeway interchange. It will be so much better than expecting cyclists to embrace longer detours, or learning to coexist with an increasingly distracted population of motorists. No matter how big the bicycle

lanes are, an SUV can kill a few cyclists in seconds (as has been shown down in Gilroy, Fremont and Berkeley).
Diversifying, not restricting, transportation modes is the way of the future.
The bicycle is the vehicle of greatest health impact and least harm. Accommodate future generations. Your children will thank you for it.
Inka Benton
94 year old bicycle activist
San Rafael resident
Architect Inka Benton won the 2010 Marin Conservation League's Marin Green Award for Environmental Leadership)

From: BRM
To: Bill Whitney
Subject: OPPOSE proposed (UGLY) Greenbrae 101 Interchange
Date: Wednesday, February 06, 2013 8:34:05 AM

PLEASE FORWARD THESE COMMENTS TO THE PARTIES INVOLVED IN THIS PROJECT WHO ARE TAKING PUBLIC INPUT. ALL OF THEM. ASAP.

We have lived in east Corte Madera for 25 years. This needlessly expensive project is a visual monstrosity and should be shelved for a smaller, less intrusive version that allows for better traffic flow using current exits/entrances and freeway right of ways.

Closing the Fifer/Lucky Drive exit is not helpful. MOST OF ALL the cement flyovers are ugly and negatively impact pedestrians and bicyclers.

TAM should have hired planners and experts who are familiar with, and respect, MARIN residents and local needs. Instead we have a massive LOS ANGELES- inspired solution here. It appears to address 101 only, not what happens when cars exit the freeway. AND, if TAM didn't get it the first time, the flyovers are UGLY. UGLY, and we have to live with them. No community support either. None. Because it is - UGLY and doesn't solve problems either. Respectfully submitted, Barbara McEntyre

From: Futterman, Michael
To: Bill Whitney
Subject: TAM Project Question
Date: Monday, January 14, 2013 10:54:35 AM

Mr. Whitney –

I am a Larkspur resident and have a question with regard to the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project. If you are not the right person to respond to this question, please forward the email to the appropriate person.

In commuting by bicycle to the Larkspur Ferry from the area near Redwood High School, I regularly use the bike path along the west side of the freeway overpass, which runs between Lucky Drive on the south side of Corte Madera Creek to the bike path along Sir Francis Drake Blvd. (next to the Marin Rowing facility) on the north side of the Corte Madera Creek. From there, the bike path crosses under the freeway and train trestle to the Ferry. This is the safest means by far of getting to and from the Ferry by bicycle from the Redwood High School area. Will these bike paths be retained, in particular the bike path over the creek along the side of the freeway overpass?

It appears to be retained on the video simulation, but it is somewhat unclear on the map on your website.

Thank you for your attention to this question.

- Michael Futterman

FUTTERMAN DUPREE
DODD CROLEY MAIER LLP

Michael A. Futterman | Attorney
Futterman Dupree Dodd Croley Maier LLP

visit 180 Sansome Street, 17th Floor
San Francisco, CA 94104
direct 415 399 3842
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MEETING OF THE
TRANSPORTATION AUTHORITY OF MARIN
TAM

JANUARY 24, 2013
7:00 PM

ROOM 330
MARIN COUNTY CIVIC CENTER
3501 CIVIC CENTER DRIVE
SAN RAFAEL, CALIFORNIA

MEETING MINUTES

Members Present:	Alice Fredericks, Chair, Tiburon Town Council Susan Adams, Marin County Board of Supervisors Judy Arnold, Marin County Board of Supervisors Sandra Donnell, Belvedere City Council Diane Furst, Corte Madera Town Council Ford Greene, San Anselmo Town Council Dan Hillmer, Larkspur City Council Herb Weiner, Sausalito City Council Eric Lucan, Novato City Council Stephanie Moulton-Peters, Mill Valley City Council Gary Phillips, San Rafael City council John Reed, Fairfax Town Council
Members Absent:	P. Beach Kuhl, Ross Steve Kinsey, Marin County Board of Supervisors Katie Rice, Central Marin – Ross Valley Kathrin Sears, Marin County Board of Supervisors
Staff Members Present	Dianne Steinhauser, Executive Director Bill Whitney, Principal Project Delivery Manager Dan Cherrier, Principal Project Delivery Manager Li Zhang, Chief Financial Officer Linda Jackson, Planning Manager Suzanne Loosen, Transportation Planner Scott McDonald, Associate Transportation Planner

Chair Alice Fredericks called the meeting to order at 7:00 p.m.

1. Chair's Report (Discussion)

Chair Fredericks reported on the reception held immediately prior to the meeting, in honor of two departing Commissioners, Scott Hunter from the Town of Ross and Mike Kelly from the City of Sausalito. She reviewed their accomplishments and thanked them for their service.

At the podium, Mike Kelly discussed his tenure on the Board as very rewarding, interesting and challenging and a lot of fun as well. He expressed appreciation for the opportunity to serve and credited the executive director for her leadership.

Scot Hunter echoed Mr. Kelly's Comments, agreeing it is a great place to serve with an excellent and informed staff.

ED Steinhauser performed the swearing in of Commissioner Herb Weiner as the newly appointed representative from the City of Sausalito.

2. Executive Director's Report (Discussion)

ED Steinhauser discussed items in her written report (included in the supplemental packet at the dais and document table), including information on the extension of federal funding for transportation projects, the California Transportation Commission's needs assessment, upcoming Larkspur Ferry Terminal pilot ridesharing effort, and the San Rafael Chamber's Leadership Institute project in San Rafael – they adopted TAM's upcoming TDM employer/employee survey assessment and TDM workplan development as their team project effort. TAM staff are most happy to engage them. She also noted that copies of Governor Jerry Brown's State of the State address today were also made available to the Tam Board and the public.

3. Commissioner Matters not on the Agenda (Discussion)

Vice Chair Arnold stated that Supervisor Katie Rice is in Washington, DC working on watershed issues.

Commissioner Adams stated she had attended the annual meeting of the California Association of Counties which caused her to be absent from the November TAM meeting where there had been discussion about deferring, to a future date, the allocation of HIP funds to either the Marinwood Village project or to the Whistlestop project. She commented that the application process for the Marinwood Village project would begin soon, and that funding/support from TAM would be critical to ensure its success.

Commissioner Hillmer commented on an editorial, today, in the *Marin Independent Journal* regarding the 101 Greenbrae Corridor project, which he would like to share during the discussion on that item.

Chair Fredericks commented on the State budget process and the elimination of reimbursement for certain procedures under the Brown Act. She requested that staff join her in making a statement that the Transportation Authority of Marin has in the past and will in the future follow Brown Act requirements, which ED Steinhauser affirmed.

4. Commissioner Reports (Discussion)

a. Executive Committee

Commissioner Moulton-Peters reported on Item 5D: Acceptance of 2012 Measure A Compliance Audit Results, briefly reviewing the audit process, and adding that the Executive Committee was pleased with the results and the process of the audit.

Regarding Item 5F: Report on the Transportation Authority of Marin's Disadvantaged Business Enterprise (DBE) Program, Commissioner Moulton-Peters explained the DBE program procedure. She stated that TAM has implemented the required provisions and the program is in good standing with Caltrans and the Federal Highway Administration.

b. SMART

Vice Chair Arnold updated the Board on the funds that had been awarded for SMART projects, including connectivity to the Santa Rosa airport area and the purchase of new rail cars. She also provided an update on the construction progress. She noted that the Marin County Superior Court had dismissed SMART from the parallel CEQA lawsuits brought by environmental groups challenging the North Coast Railroad Authority's (NCRA) resumption of freight service.

5. CONSENT CALENDAR (Action)

a. Approve TAM Minutes of November 29, 2012
b. Exercise 2nd Year Option on Transportation Demand Management (TDM) Software Contract with Transmetro, Inc.
c. Measure A Allocation to Local Infrastructure Projects in Strategy 3.2
d. Acceptance of 2012 Measure A Compliance Audit Results
e. Marin-Sonoma Narrows – Contract time extension to provide Design Support During Construction
f. Report on the Transportation Authority of Marin's Disadvantaged Business Enterprise (DBE) Program
g. Reappoint TAM Board member Gary Phillips to the Sonoma-Marin Rail Transit District (SMART) Board of Directors

At the request by a member of the public, Chair Fredericks removed Item 5b: Exercise 2nd Year Option on Transportation Demand Management (TDM) Software Contract with Transmetro, Inc., from the Consent Calendar and it was heard separately.

Commissioner Arnold moved to approve Consent Calendar Items 5a and Items 5c-5g. Commissioner Ford seconded the motion, which carried unanimously.

5b. Exercise 2nd Year Option on Transportation Demand Management (TDM) Software Contract with Transmetro, Inc.

David Schonbrunn requested an oral update as to accomplishments of the Transportation Demand Management program as well as feedback from the users. ED Steinhauser reported on the main features of the program- vanpool assistance, Emergency Ride Home (ERH) and employer/employee outreach. She also mentioned the success of Schoolpool. She emphasized that the software developed and used in both the Emergency Ride Home program and the School Pool program have been very successful, cost-effective and user-friendly, software developed by Transmetro. Staff recommends the contract extension so that software changes can continue to be made as necessary. She stated staff would bring a full status report at the next meeting.

Chair Fredericks opened public comment on the item.

Mr. Schonbrunn thanked staff for the report and suggested that TAM consider marketing the intellectual property.

Commissioner Adams supported Mr. Schonbrunn's comments and suggested that an annual report showing progress and mile markers for these programs would be interesting and helpful. ED Steinhauser agreed to bring a report back to the next TAM meeting.

Seeing no further speakers, Chair Fredericks closed public comment on the item.

Commissioner Adams moved to approve Consent Calendar Item 5b. Commissioner Greene seconded the motion, which carried unanimously.

6. Caltrans Report (Discussion)

ED Steinhauser reviewed the report in the agenda packet on Caltrans projects. She also noted that TAM worked closely with the County of Marin on a highway bridge program grant - just awarded - to add bicycle and pedestrian accommodations to the San Antonio Creek Bridge as part of the Marin Sonoma Narrows highway project. TAM will contribute a match to this $5 million grant which staff will explain in more detail at a future TAM meeting.

7. Approve Letter of Support for dedicated funds at the state level for Safe Routes to School (Action)

Gus Khouri, of Shaw Yoder & Antwih, gave an update on the state budget, noting for the first time in six years, the lack of a state budget deficit due, in large part, to the passage of Proposition 30. He commented on new funding for transportation with the focus placed on transit and high speed rail. He stated that additional resources would be necessary when Proposition 1B expires later this year, and staff would continue to monitor that and look for ways to maintain current funding levels. He added that a coalition from both legislative houses is working to update CEQA.

ED Steinhauser reviewed the letter drafted which explained the importance of dedicating funds to the Safe Routes to School program at the state level, and encouraged the governor continue level funding of at least $46 million per year as a minimum guarantee for the program.

Chair Fredericks opened public comment on the item.

Deb Hubsmith, Director of the National Safe Routes to School Partnership, expressed support for this letter and thanked staff for agendizing this item. She commented on the benefits of the Safe Routes funds to public safety and health and encouraged the Commission and the public to send personal letters of support to the governor's office.

Seeing no further speakers, Chair Fredericks closed public comment on the item.

Commissioner Arnold moved to approve the Letter of Support, and Commissioner Moulton-Peters seconded the motion which carried unanimously.

8. Acceptance of the Citizens' Oversight Committee (COC) Annual Report (Action)

Chief Financial Officer Li Zhang presented the report which requested the TAM Board to accept the final Draft Citizen's Oversight Committee (COC) FY2011-12 Annual Report. She noted that the Committee would now be overseeing revenues and expenditures from the Measure B Vehicle Registration Fee as well as the Measure A ½ cent Transportation Sales Tax. She stated the Committee is devoted and active in providing oversight on these two revenue sources. She also reported that the Committee's member positions are now filled, although there are still openings for alternate member seats. She urged the Commissioners to refer candidates for these vacancies.

COC Chair Allan Bortel presented the report, noting that revenues for both Measures have come in close to projections, and the initial program figures for Measure B are very promising. He discussed various programs supported by the Measures, and he expressed appreciation for the Committee members (all volunteers) and for the excellent support provided by TAM staff. He also noted that copies of the report will be available online in the near future.

Chair Fredericks thanked Mr. Bortel for his work on the Committee. She opened and closed public comment on the item with no speakers coming forward.

Commissioner Adams moved to accept the report and Commissioner Lucan seconded the motion which carried unanimously.

9. Highway 101 Greenbrae/Twin Cities Corridor Improvement Project Update (Discussion)

Chair Fredericks clarified that the report is a project update only, not a public hearing, although the public will have a chance to comment.

ED Steinhauser indicated that Principal Project Delivery Manager Bill Whitney would be giving a brief staff report, followed by information from David Parisi of Parisi Associates regarding traffic and bike/ped issues and Scott Steinwert of Circlepoint, regarding the Environmental Review process.

Mr. Whitney reviewed the background of the project dating back to 1987 and the upcoming public hearing scheduled for January 29 at Redwood High School. He reviewed the context-sensitive design approach undertaken which is meant to embrace communication with the community to better understand their needs and desires related to the project to then develop alternatives to meet those needs and desires. He noted the public outreach conducted over the years including over 30 publicly noticed meetings with input extracted to develop a list of key issues including: access to and from the highway on- and off-ramps, potential impacts on local roads, bicycle and pedestrian connections, bus operations and access, environmental impacts, and construction impacts. He went on to explain the project purpose, the project area, past corridor development, and existing conditions including closely situated ramps which are separated by less than one mile, creating congestion due to merging/weaving traffic.

Mr. Parisi, Parisi & Associates, discussed congestion and safety aspects of the current configuration of 101 and under the proposed project, and the multi-modal component improvements associated with this project with related benefits for bicyclists and pedestrians.

Mr. Steinwert commented on the project's environmental documents for which Caltrans is the lead agency, the environmental review process, and the environmental topics/resources assessed. He reported on key environmental findings and noted proposed mitigations.

Mr. Whitney concluded the presentation with a review of the upcoming public hearing regarding the project and encouraged the submission of written comments as well (either to Caltrans directly or through TAM, which will forward them to Caltrans).

ED Steinhauser noted that the project is currently in the environmental phase and comments from the public are welcome. She thanked those in attendance tonight, noted that a general description of the public's comments would be included as part of the public record, and encouraged those who want more specifics of their comments to be included, to fill out a comment card available on the table nearby. She expressed willingness to hear questions/comments from the Commission and/or to bring back more information at a later meeting.

Commissioner Hillmer asked about the bus stop map that showed the area around Tamal Vista Blvd. and the potential redistribution of traffic. He was concerned about other streets that might be impacted from the change, especially during the local schools' rush-hour periods. Mr. Parisi said analysis concluded that neither the traffic pattern nor the volume would be increased and adversely affected. He added that Wornum Drive would also be widened adding a left turn lane onto the new freeway ramp, which would enable it to handle more traffic. He actually thought that traffic in the Wornum Drive / Tamal Vista area would be lighter as a result of the changes.

Commissioner Adams asked for confirmation that the comments that were being heard tonight would be logged and passed on to Caltrans. ED Steinhauser said yes, even though this is not a public hearing for the environmental document, the comments would be submitted to Caltrans.

Commissioner Adams asked about the aesthetics of the project including the height of the flyover, and Mr. Whitney show a simulation of the traffic flow on 101 after the project is completed. Commissioner Furst asked staff to show the driver's view simulation; Mr. Whitney said he did not have that simulation with him but it was available online, and he gave the web address.

Chair Fredericks noted that there was much resource information available for the public. ED Steinhauser agreed and also noted that an open house would show project features and summarize draft environmental document information at the January 29 hearing.

Commissioner Hillmer remembered that one of the first concerns to motivate these changes was the increasing level of traffic coming across the Richmond Bridge, onto Sir Francis Drake Boulevard and blending with traffic coming off 101. He requested more information as to how the proposed improvements will address that, which Mr. Parisi provided. He stated that south Hwy 101 bound traffic, approximately 2500 cars/hour, that access Hwy 101 by merging onto the one-lane ramp over the Corte Madera Creek come from both directions - east and west – Sir Francis Drake. Approximately 60% come from SFD to the west and 40% come from SFD to the east, much of that from the Richmond-San Rafael Bridge. Given the traffic counts from that direction have been relatively stable over the past 5 years, these 2500 cars weaving across traffic getting off at Lucky Drive cause delays due to congestion. The proposed improvements will address the concern stated by Commissioner Hillmer. He added that the rate of increase in traffic in the peak hour coming from the Bridge has been slowed by the SF Drake reduced width coming off the bridge.

Commissioner Furst asked about the height of the proposed flyover structure, a question she said Corte Madera has been asking for some time, but with no satisfactory response. She asked about comments Mr. Whitney had made in another setting that the flyover, from the surface road to the bottom of the structure would be 44 feet to the road bed and then the side rail guard is another 6 feet equaling close to 50 feet. Mr. Whitney compared it to the existing crossing over Wornum where the road surface at that point is about 40 feet and the braided ramp, at the highest point is approximately 44 feet at the road surface. He noted that the new structure would be approximately 4 feet higher compared to the existing one.

In response to Commissioner Furst asking for the elevation of the Fifer on ramp, Mr. Whitney said he did not have that information.

Commissioner Greene asked about the history of the bicycle/pedestrian overcrossing and how long it had been in existence. Mr. Whitney acknowledged it has been there since 1954, but he pointed out it was originally built to provide access over the highway due to the fact the railroad tracks occupied the current location of the Wornum Drive undercrossing..

Commissioner Greene asked if there had been any evaluation of the view impacts of Mt. Tam the flyover may have for the Boardwalk residents and the mobile home park residents on Industrial. Mr. Whitney indicated that the visual assessment showed no significant impacts created by the new ramps. ED Steinhauser added that, currently, the view from the mobile home park is a freeway overpass or a freeway offramp. Commissioner Greene pointed out the views from the Boardwalk were substantially better. .

Commissioner Greene also expressed concern about the hydrology of the area, noting that Lucky Drive experiences regular flooding, and rising sea levels will only make it worse. He asked whether this issue had been considered in the design. Mr. Whitney said that a sea level rise analysis was prepared, as well as a hydrology and flood plain analysis which determined changes in the runoff would be minimal and would not exacerbate the existing conditions. The design recognizes flooding that occurs today and elevations will be changed, where possible, to alleviate that but the base level of the highway will remain as it is now.

Commissioner Greene asked what the reasoning is for eliminating the current pedestrian overcrossing and whether or not an evaluation has been done to determine what it would take to maintain the over-pass in terms of design and cost. Mr. Whitney discussed the project's goals regarding pedestrian and bicycle facilities which was first to make improvements within the state highway right of way and when that proved impossible, then look to the local roadway right of way for room to make improvements and finally expanding into private property only when absolutely necessary. Most of the current recommended Build Alternative's sliver "takes" of private land involve the bike/ped amenities as shown in one of the slides used during this presentation. Research showed that two-thirds of those using the overcrossing were transit users and the relocation of bus stops has eliminated the need for transit users to use the over crossing. By removing this pedestrian overcrossing structure from the project, it has decreased the amount of additional property necessary to be "taken". He added that he believes that the proposed improvements, without the overcrossing, will meet the needs of those using the north/south greenway.

Upon further questioning from Commissioner Greene, ED Steinhauser stated that it will be impossible to keep and maintain the current overcrossing because it stands in the way of the proposed ramp improvements. It is possible to rebuild the overcrossing in that same general area but there are buildings/businesses that would be affected and TAM staff is not prepared to present those possibilities

at this meeting but possibly at a later one. She added that the current overcrossing does not meet ADA requirements.

Commissioner Hillmer asked about the project phasing, and in particular, the longest possible time available to retain the current overcrossing. Mr. Whitney replied that any roadway improvements, north or southbound, demand the removal of the overcrossing and would be the first order of work.

Noting the main reason for the project is to eliminate congestion and the weave, Commissioner Phillips asked whether analysis was done regarding potential cost-savings from improving traffic and reducing the number of accidents. Mr. Parisi provided additional information regarding traffic safety and cost benefit analysis projected to 2035.

Responding to a question from Commissioner Phillips about the height of the existing flyover in San Rafael, ED Steinhauser said she could provide additional height comparisons, noting she did not have the information readily at hand.

In response to a question from Chair Fredericks, Mr. Whitney indicated that the approximate height of the structure would be similar to the existing structure at Wornum Drive.

Commissioner Furst commented on an overpass at the East Blithedale/Tiburon Blvd. exit with signage that says, “15 feet, 3 inches” and stated that the proposed overpass would be about three times as high as that.

Commissioner Furst also questioned the traffic collision statistics, noting that information she had indicates the current configuration has a lower accident rate than the Caltrans average with the exception of the northbound ramp at Industrial. Mr. Parisi explained that the numbers she cited were only for a 3-year period when traffic levels on the whole corridor were suppressed due to economic reasons, whereas the numbers he referred to represents a 10-year timeframe, which is why the data may differ.

Commissioner Furst responded that the 3-year data is from 2007-2009 and given the economic downturn didn’t occur until the end of the third quarter in 2008, that would really probably have minimal effects on the data.

Chair Fredericks asked for clarification from staff regarding the overpass that Commissioner Furst referenced. ED Steinhauser stated she was referring to clearance rather than the actual height; she added that minimum clearance is usually 18 ft., and if the clearance is specifically signed, it usually means the clearance is less than that. She agreed to bring back more information regarding that overpass to the next meeting on the project.

Commissioner Moulton-Peters asked if some of the diagrams and other materials could be enlarged for future discussions, to make it easier for the Commission to see and understand. Regarding the bike/ped improvements, she asked for greater detail of the Wornum Drive area.

Commissioner Greene asked and ED Steinhauser confirmed that the comments made tonight will become part of the public record for CEQA purposes.

Chair Fredericks again clarified for the public the purpose of the meeting tonight, to provide information on the Greenbrae Twin Cities project and to hear comments from the public regarding the proposed project. She also reiterated that TAM is not the lead agency on the project and will not be making any

decisions tonight about the project, and she reviewed other options for public comment including the official public hearing to be held on January 29 at the Redwood High School Cafeteria from 6:00-8:00 p.m. She added that comments made this evening will be included along with the comments submitted on January 29. Expanded comments can be expressed at the public hearing, by submitting comments on a written comment form available at the document table, or by submitting comments on the TAM website.

Commissioner Hillmer asked for clarification on TAM's role in the process. ED Steinhauser clarified that TAM does have oversight in the funding of the project, which allows TAM the ability to have input in the shaping of the project. There was brief discussion between staff and the Commission regarding the process and the roles of TAM, the Board and Caltrans in working together to achieve the best project possible.

Chair Fredericks opened public comment on the item.

Karen Nygren, expressed concern that there are only two alternatives allowed under the draft environmental document:1) the preferred alternative with a massive use of concrete, an extremely high elevated structure and large retaining walls that will block views of Mount Tamalpais; or 2) the no-build alternative. She commented on the increased congestion on the local roads and said that based on the alternatives , she has no other choice but to support the "no build option." She urged the Board to direct staff to develop another alternative.

Andy Peri, Marin County Bicycle Coalition, thanked the TAM Executive Committee for agreeing to conduct the presentation this evening so that the Board and the public can hear the particulars of the project. He noted that their online petition which supports replacing the current pedestrian overcrossing has over 1100 signatures. His primary concern was the lack of a safe and separate overcrossing, and he expressed that one could be built without taking out any existing buildings. He asked the Board to direct staff to find creative solutions and maintain safe and separate bike/pedestrian facilities, as has been done elsewhere in the county.

Cindy Winter, a Greenbrae resident, indicated she has designed an alternative configuration for a pedestrian overcrossing, which she has been advised to submit to a highway engineering expert for review. She stated that her plan destroys no businesses, is fully ADA compliant and takes no property. She commented on the increasing population density in the area and the need to encourage bicycle/pedestrian activities. She also questioned the need for the flyover.

Scott Stokes discussed his education and experience in transportation. He commented on the need to develop an economic, financially feasible solution with the maximum benefit for all parties. He stated that he had also created an alternative configuration – "Plan Simple" - that he urged the Board to review and consider.

Bob Ravasio, a Corte Madera Town Councilmember, said he was speaking not as a councilmember, but rather would share with the TAM Board questions and concerns he has received from his constituents. They question spending $143 million on a project that: 1) does not increase highway capacity; 2) addresses the SFD entrance when Caltrans statistics show that is actually below the state average in accident rates for that location; 3) does not address any of the traffic issues on SFD; 4) completely ignores what's going to happen at Larkspur Landing when the SMART train gets there and the possibly hundreds of additional housing units that will be built there; 5) includes in the project a flyover that's 50 feet above the existing roadbed which will block views and light along that section of the freeway of Mt Tam and CM Creek; 6) will provide for a marginal level of service (1 minute, 15

seconds) increase in the southbound lanes 7) does not addressing flooding on the freeway; 8) makes Central Marin look like the MacArthur Maze; and 9) will force more traffic onto Wornum when the potential for traffic congestion is catastrophic. He finalized his comments by asking that, in light of all these questions, how can Caltrans and TAM possibly issue a negative declaration on this project?

Jana Haehl, former mayor of Corte Madera, commented on the many inadequacies of the draft environmental document and the great public opposition to the project in its current configuration. She stated that the only option that will make the residents of Marin happy is the no-build alternative.

David Hoffman, former Director of Planning for the Marin County Bicycle Coalition, expressed concern that the public was not informed about the removal of the pedestrian overcrossing until recently. He was always led to believe that there will be a number of options for consideration and that it was implied that the overcrossing would not be affected. He discussed Marin County's goal for 20% mode shift to bicycle/pedestrian use by 2020, noting that removal of the overcrossing is counter-intuitive to that goal. He also noted that traffic will continue to increase and keeping the overcrossing is the best option.
Cheryl Longinotti, a certified bicycling instructor, echoed Mr. Peri's comments about bicycle safety issues related to the project, particularly at Wornum, as well as increased congestion and warned that Wornum will be a tragedy

Steve Cardelini, a resident of Corte Madera, asked whether comments and suggestions for major design changes at the upcoming public hearing would be welcomed and considered. He was also concerned about the monstrous appearance of the flyover and the noise impacts for the nearby residents.

Jonathan Toste, former chair of San Rafael Bicycle and Pedestrian Advisory Committee, spoke for the replacement of a fully separate bike/ped overcrossing for safety supported by his research on international design standards, and equal access for areas south of the creek.

Peter Chase, a resident of Corte Madera and a bicyclist who regularly uses the overcrossing, stated that in his experience (construction), designers are expected to develop alternatives until all concerns by the client are addressed. He urged the TAM Board, as the client of this project, to demand more alternatives.

Ron Rosano, a resident of Greenbrae, pointed out that the graphics fail to depict the freeway near BevMo, contrasting the difference in the proposed vs. present freeway width. He calculated as many as 16 projected lanes vs. the current 11 lanes, which he felt violated the philosophy of Marin County. He was also concerned that the volume of traffic vs. collisions graph scales were disproportionate. He suggested that widening the intersection at Greenbrae may very well move the "bottleneck" to the Tamalpias Avenue area, and recommended more technologically sophisticated traffic projections.

At this point, the Chair stated that the public hearing would need to be closed following the speakers already standing and she imposed a one-minute limit.

Maria Stainbrook, a resident of Corte Madera and a frequent driver on Tamal Vista and Wornum, asked and received a clarification that neither the Lucky Drive nor Madera Blvd exits will be closed. She said she felt the plan to add another exit would only make the spacing worse. She was invited to attend the hearing, but felt this meeting's presentation should have been clearer. She said she failed to see how local street traffic volumes and air quality will be improved and that she has a concern about the height of the flyover.

David Samer, a resident of Corte Madera, commented on the hazardous conditions for bicycles currently in the Wornum Drive area. He also noted that the materials presented tonight were not clear or large enough. Chair Fredericks responded that previous meetings had larger exhibits, but none were brought tonight because it was merely an update for the Board, not a public hearing. If staff had known how many would come tonight, they would have brought additional visual aids.

Mike Gasper, a resident of San Rafael, thought it ironic that a project purported to increase accessibility and safety would remove a much-used overcrossing and actually decrease safety/accessibility. This will create an access desert on both sides of the freeway especially since the completion of the North-South greenway will create more bike traffic through this vital access area.

Gene Seaver, a resident of Corte Madera, expressed concern that increasing the lanes on Wornum Drive will make it less safe for bicycles and pedestrians. He also commented on safety issues for children, especially when traveling together.

Jean Severinghaus, a resident of the Greenbrae Boardwalk, said she was extremely worried about the amount of traffic in the area of the bicycle overcrossing and the number of people needing to get back and forth across the freeway. She noted that, in the Fifer Avenue area, a neighbor's child had been hit twice crossing with the light and within the crosswalk.

Thomas Jacovics**,** a property owner in the area of the project, was concerned about access to businesses that might be affected by the proposed changes along Nellen Avenue. He agreed that 48' was too high for the flyover structure, and he noted that Wornum is the shortest street in California with no curb cuts and there is no way that it can absorb any more traffic.

David Schonbrunn, TRANSDEF, noted that this project never went through the normal priority-setting process to analyze its cost-effectiveness and is emblematic of the transportation world's failure to think strategically and is the definition of "business as usual." He urged the Board to think strategically about alternatives to single-occupancy vehicles, the #1 contributor to greenhouse gases.

Alisha Oloughlin, an MCBC member and concerned parent, said she would never ride with her daughter through the Wornum intersection nor would she let her ride it alone. She believes that a safe and separate facility for pedestrians and cyclists should be built if the current overcrossing is razed. .

Lee Greenberg, who lives very close to Hwy 101, said he believes that the proposed project is an overkill solution to the problem he thought buying each Board member a new Mercedes would be a better use of the $142 million than the proposed project. He was doubtful that it would meet the needs it set out to do.

Charles Harris of San Rafael and a frequent bicyclist, was concerned that the present incompatibility of bicycle and large vehicle traffic would only be made worse if one of the few and safe segregated routes in this area was eliminated.

Dr. Alice Increshan of Larkspur, who regularly uses the overcrossing on foot and by bike, recounted numerous close calls in traffic and passionately lobbied for the overcrossing. She also cited that there is socio-economic discrimination associated with this project due to the number of lower-income residents who will be affected if the overcrossing is removed.

Walter Strykosch of Mill Valley and previously a long-time Los Angeles area resident, left that area when it became overrun by freeways. He said that he would hate to see Marin head in that direction

and he was concerned that the viaducts on the East and West side that will carry the north-south access roads, would be elevated freeway segments like those in Los Angeles.

Don Herzog of Mill Valley, simply stated that the pedestrian overpass should be preserved in view of it being an essential piece of the bicycle/pedestrian network.

Deb Hubsmith, previously a staff member of the Marin County Bicycle Coalition, commended the staff for the many bicycle projects over the years. So she expressed surprise that the removal of the bicycle overcrossing was not mentioned in previous meetings. She wondered how Richmond-San Rafael Bridge traffic would be reduced, this being the purpose of Regional Measure 2 toll funds. She asked if future development, the new SMART station, rising gas prices, peak oil, health concerns about lack of physical activity, the need to address greenhouse gas emissions, and safety. was taken into account, and that the staff be asked to work on creative alternatives with a full EIR.

Seeing no further speakers, Chair Fredericks closed public comment on the item.

Commissioner Furst opened her comments by stating that all of the public who spoke were critical of the project. She summarized her view that the project will not increase freeway capacity, address flooding, or adequately address traffic on Sir Francis Drake Blvd. She also stated that it does not address safe bike/pedestrian needs, that transit/bus riders will need to walk further between bus stops in the Wornum/Fifer area and that the project will create view impairment contrary to what is stated in the environmental document. She encouraged the public and every TAM commissioner to take a look at that supporting documentation because she believes that it contains some surprising information including that there are no anticipated significant impacts to the view when you are proposing a 50 ft. elevated flyover on one side and elevated ramps on the other side in spite of the fact that the area is surrounded by majestic views of Mt Tam and the shorebird marsh and the Bay. She predicted that the Corte Madera Town Council is most likely going to vote to oppose the project since concerns previously raised are still lacking answers. She reviewed a timeline of those communications including a resolution requesting, in November 17, 2009, that the environment report evaluate different project variations and while some options being reviewed and eliminated, the end result offered up was a build and a no build. She added that the resolution also explicitly stated that the “context sensitive design” approach used by TAM and Caltrans has not addressed the Town’s concerns and she believes that this still holds true. She stated that in July, 2011, in a letter to TAM, the Town Manager expressed concern that there will be increased congestion at the Wornum/Tamal Vista intersection, and, once again, expressed a desire for a more complete context sensitive design solution but that concern was disregarded. That letter also stated that there was very little consensus with the southbound design and that concern was disregarded. She went on to say that on December 1, 2011, at a TAM Board meeting, she expressed that there was no consensus of support at the Town level and that at the June 11, 2012 TAM Executive Committee Meeting and the June 28, 2012 Board meeting, she requested wording to be added to a project update report for the MTC, specifically so that we could convey to the MTC that the Town has expressed concerns about this project. She said that she was appalled to hear that TAM staff said, only a couple of weeks ago, that they were unaware that Corte Madera has expressed concerns about this project so she thought it was important to clarify that.

She questioned why this project is very much oriented towards automobiles rather than bicycles, pedestrians, and transit riders when 180 units of high density housing are being built and that there is potential for 900 units near the Larkspur SMART station. She stated that this county is trying to find ways to build housing that fosters pedestrian accessibility, walkability to our local shopping centers, to our transit stops and that this area will not be a walkable neighborhood if the flyover gets built.

She cited a conversation she had with John Norquist, the former mayor of Milwaukee and the current executive director of Congress for New Urbanism, a non-profit organization out of Chicago that deals with some of these issues of sustainability, walkability, liveable communities and how transportation helps foster those kinds of things. He said that transportation infrastructure should add value to the place it's built and that she believes that this project does not add value other than maybe creating some profits for construction companies, some jobs, and eliminating weaves for vehicles.

Commissioner Furst stated that she had a letter sent to the Governor by Marty Griffin, a groundbreaking Marin environmentalist referring to this project as a poorly planned blight and requesting the Governor to personally get involved to see that this project does not go through.

As to the traffic patterns and volume on local roads associated with this project, she expressed her belief that, in spite of what has presented, Tamal Vista will see a serious increase in traffic that it will not be able to accommodate

She acknowledged that TAM staff had been very responsive, in certain ways, in trying to allow the Town of Corte Madera to work with their freeway engineer from Jacobs to consider something along the lines of a frontage road parkway concept that would eliminate the need for a flyover, the need to eliminate the bike/ped overcrossing, and provide improved bike/ped facilities. However, it did not pass muster with Caltrans standards.

She finalized her comments by stating that she believes that this project should be subjected to a full EIR process, that she hoped the commissioners had listened intently to what these members of the public have said this evening, and that she hopes everyone will attend the meeting on the 29th because it's important to consider the public's opinion whether it is worth spending $143 million on something that so many people are against and have so many negative impacts.

Commissioner Reed emphasized the need for separating bicycles and pedestrians from vehicles. He was concerned about the overcrossing. He promoted the idea of the use of pylons to force traffic to exit at Madera Blvd. instead of Lucky Drive. He expressed his hope for more options and a longer range view.

Chair Fredericks reminded those present that the Commission's role at this point was advisory and not decision-making and to inform staff regarding clarifications that are needed.

Commissioner Greene gave his impression of the project as carrying a lot of momentum, but limited choices in safety and aesthetics.

ED Steinhauser reviewed the project's steps including earlier options offered, and that the current state of the project reflects input from the Board and the public up to this point.

Chair Fredericks clarified that the Board's involvement goes back 5 years.

Commissioner Hillmer stressed the importance of the comment period, complimented staff and, again, referred to interest in the cost versus the benefit of the changes. He pointed back to the project's original impetus of traffic exiting the Richmond-San Rafael Bridge particularly on Sir Francis Drake Boulevard. He asked what the recent slowing of the increase in traffic volume meant to the project. He also referred to Corte Madera's inclusion in the process because of the Tamalpias interchange and the shopping center business owner's concerns, and how these led to the current alternative and its related costs. He emphasized the importance of the upcoming Corte Madera/Larkspur joint council meeting on

February 5, the February 6 Larkspur Council meeting, and the February 11 Corte Madera Council meeting where this topic will be discussed. He stressed that the bike overcrossing was central to the needs and image of the community.

Chair Fredericks asked staff to report back on impacts to Tamal Vista.

Commissioner Phillips asked if the $145 million for this project, if not used, could be spent on other projects in the county. ED Steinhauser responded that the money is specific to the project, and that the Metropolitan Transportation Commission would have to make the determination.

Commissioner Furst asked about the distinction between dollars for "project" as opposed to dollars for "corridor." ED Steinhauser responded that the wording was specific to congestion and safety issues at this location, and that moving funds away from the original intent involved a specific process.
Chair Fredericks asked, and ED Steinhauser responded to a question about the costs of the current environmental phase, currently estimated at approximately $4 million

Commissioner Hillmer pointed out that the complexity for Caltrans is largely due to the "non-conforming" nature of conditions in this corridor. ED Steinhauser responded that Caltrans wanted to close many of the off-ramps, but the local Councils refused to close any of them. The TAM Board directed staff to fight to keep them open, continue access to the businesses and to include bike facilities. She stated that the problem that the project was designed to address was the congestion and number of accidents - the dilemma is how to reduce accidents while keeping access points. She added that staff will take direction from the Board should that decision be to revisit options for this area but it will cost money to do that. She added that standards set by Caltrans is not what brought the project to this point. Rather, it is the insistence that all of the current ramps be left open and unaffected.

Commissioner Hillmer pointed out that the document is presented as an "up or down" question, and ED Steinhauser explained that this is due to all the other alternatives being eliminated but that she looked forward, if so directed, to reviewing those rejected alternatives with the Board at a future meeting.

10. Marin County Bike Share Feasibility Study (Action)

ED Steinhauser introduced Planning Manager Linda Jackson to present the staff report which requested that the TAM Board 1) accept the Bike Share Feasibility Study with commendations to the members of the Bike Share Advisory Working Group and 2) authorize Executive Director Steinhauser to approve $55,000 in contract work for outreach to prospective sponsors for a bike share program and for technical advisory services. Work shall be phased, with reports on outreach success to be made no later than six months and one year after efforts begin and next steps on implementation to be made after sufficient outreach is completed.

Ms. Jackson gave an overview of the process, list of goals, and the scope of the study. She then introduced Casey Hildreth, Alta Planning & Design, who reviewed the key findings of the study, target demographics and next steps in the process.

Scott McDonald reiterated the recommendation as directed by the Executive Committee. ED Steinhauser commented on the need to find a private sponsor who might be willing to work with TAM to ensure a Bike Share program is successful.

Commissioner Adams said she was a bit unclear as to how such a program would work in Marin, i.e. where would one get the bike, how would someone find out about available bicycles, and who would be responsible for maintenance, ownership, etc. She also expressed concern about security issues and anti-theft elements and about potential fund sources.

Vice Chair Arnold reiterated that the staff recommendation that staff is recommending spending $55,000 to explore opportunities for a public/private partnership after which staff would return to the Board with a recommendation to move forward or not. ED Steinhauser agreed and clarified that staff would begin this research with $25,000 and after returning to the Board with an update, the board could direct staff to continue the work with the remaining $25,000. Vice Chair Arnold expressed her support for the recommendation.

Commissioner Reed commented on the need to ensure that the study is large enough to give TAM enough information to make a decision on the merits of the proposal. He questioned whether ALTA's focus on transit possibilities was the best direction for the program as well; he specifically noted that tourism was a strong contender as well.

Chair Fredericks reminded the Board that the issue tonight is to accept the report and approve/deny the request for $25,000, initially, for further study. She indicated that decisions about implementation will come later in the process.

Commissioner Weiner suggested using Sausalito City Hall as an access point for bikesharing rather than the Sausalito Ferry Terminal.

Commissioner Adams asked that presentations about implementation of the program include potential funding sources to help the Board prioritize the elements.

Chair Fredericks opened public comment on the item.

Andy Peri, Marin County Bicycle Coalition (MCBC), thanked staff and Alta for their efforts. He indicated MCBC enthusiastically supports this program.

Scot Hunter, former TAM Commissioner and member of the bike advisory group, asked the Board to follow the recommendation of the Executive Committee, to allow more study of the possibilities.

David Hoffman of Fairfax, also urged the Board to take the recommended action.

Mike Kelly agreed that the idea of a bike-share program was worthwhile, as it will encourage alternative transit other than the private automobile.

Seeing no further speakers, Chair Fredericks closed public comment on the item.

Vice Chair Arnold moved to approve the allocation of $25,000 for a Bike Share feasibility study. Commissioner Greene seconded the motion, which was unanimously approved.

DRAFT

11. Review Draft Work Scope for Contract RFP for Continuation of Safe Routes to Schools Program (Discussion)

ED Steinhauser introduced the item briefly, and then turned it over to Transportation Planner Suzanne Loosen for a fuller report.

Ms. Loosen discussed the soon-to-be released scope of work for renewal of the Safe Routes program and funding levels. ED Steinhauser also commented on potential areas for expansion, while still preserving the core elements of the program. She indicated that a recommendation from the contract process would be presented at the May Board meeting.

Commissioner Adams expressed the need for sufficient data as to program success to be included when the full evaluation and request for funding is made, as well as improving the focus on public transportation as an element of the Safe Routes program. She was also concerned that there be some building done soon, rather than just planning and engineering, in order to see how well everything works.

Commissioner Greene asked at what point suggestions for program elements should be made. ED Steinhauser said now would be the best time. Commissioner Greene noted that several of the high schools have mountain bike teams, and there may be a way to involve those students with younger children on bikes.

Commissioner Lucan asked if the scope of work would be scalable should the state funding be decreased. ED Steinhauser explained that the proposal is for the core program only, based on sales tax funding; areas for potential expansion are included in case additional funding becomes available.

Commissioner Moulton-Peters noted that all five elements of the Safe Routes program are included and that roughly half of the funds budgeted are for education and encouragement, a continuing need since the school populations continue to change. She also mentioned that there is some potential funding from the One Bay Area Grant (OBAG) program.

Chair Fredericks opened public comment on the item.

Deb Hubsmith, Safe Routes to School National Partnership, commended Marin County for its leadership in Safe Routes. She also commented on additional grant funding that Commissioner Kinsey was able to secure for the Bay Area through the Metropolitan Transportation Commission (MTC).

Seeing no further speakers, Chair Fredericks closed public comment on the item.

Commissioner Adams asked whether the suggestions made tonight will be incorporated into the proposal. The Board agreed by consensus, and ED Steinhauser confirmed they would be included.

12. FY2012-13 Second Quarter Financial Report (Discussion)

Chief Financial Officer Li Zhang noted that Measure A and Measure B revenues have come in above projected amounts, but the sales for the holiday season, which staff will be notified of in March, may not have been as high as anticipated. She also reported that TAM is conducting an investment strategy analysis to ensure the highest rate of return on our funds. .

Chair Fredericks asked about sales tax revenue collected for online sales, and Ms. Zhang replied that those numbers for October through December will not be available and provided to TAM until March.

Commissioner Adams asked what the MTC loan replacement was for, and Ms. Zhang explained it was for the $12.5 million for Highway 101 Gap Closure project secured through MTC rather than seeking funding from an outside source through bonding sales tax.

Chair Fredericks opened and closed public comment on the item with no speakers coming forward.

13. Open time for items not on the agenda

Seeing no members of the public wishing to speak, Chair Fredericks adjourned the meeting at 11:10 p.m.

Approved:

_____

DRAFT

From:	Denise Merleno
To:	Bill Whitney
Cc:	Dianne Steinhauser
Subject:	Website inquiry on Greenbrae
Date:	Monday, February 11, 2013 8:43:17 AM

BW,

This in from the website...

Denise Merleno
(415) 226-0820
Please Note New Address as of November 11, 2012:
Transportation Authority of Marin
781 Lincoln Avenue, Suite 160
San Rafael, CA 94901

-----Original Message-----
From: WebForm@tam.ca.gov [mailto:WebForm@tam.ca.gov]
Sent: Sunday, February 10, 2013 2:44 PM
To: Denise Merleno
Subject: Message from TAM Website Email Form - General Inquiry

Submission information

Submitter DB ID : 753
Submitter's language : Default language
IP address : 75.61.91.52
Time to take the survey : 11 min. , 59 sec.
Submission recorded on : 2/10/2013 2:44:09 PM

Survey answers

Your name: (First Name and Last Name) *
Vivian
Terry

Email address: *
vivianterry@earthlin.net

Question or Comment: *
I am a disabled person who uses the bus to get to Trader Joes and Pier 1 Imports. (The Lucky Drive portion.

I Head north bound to get my groderies and items and then cross the street, using the over pass to head back north bound to go home.
It would b3e too expensive to get a taxi to take me home to the Sausalito area and usogm the bus has been essential for me during the weekends when I can shopl

I listened and watdhed,the report done on January 24th to learn that for some unknown reason, money primarily, that the overpass will be eliminated disretardintg the people who use it on a regular basis.

I do not have whistle stop to use I am not part or able to use that agency and elimnating the over pass

will have a great impact on my bility to shop at an afforadable Why elimonate something that is so useful to retular, non-driving people?
There are no phones to call for assistance from that spot, so how are regular people to utilize the shops there?

I do use Catch A Ride, but it can only be used 4-times per month so that option of using that is also out for me.
I think the option is a very sad state of where regular non-driving people are being left with out a viable option. Becase of walking problems, I cannot walk farther south to catch a ride; as one of the speakers proposed, and carring multiple bags of groceries from Trader Joes and the World Imports is nearly impossible to do.

The elimination of this overpass is really givint little concern to people who walk over it with groceries and people who ride over it.
Can it be rebuilt? Is my question.

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

San Francisco Bay Regional Water Quality Control Board

January 15, 2013
CIWQS Place No.: 745736

Sent via electronic mail—a hard copy will not follow

California Department of Transportation
Attn: Ms. Valerie Shearer
Valerie_Shearer@dot.ca.gov
Office of Environmental Analysis, MS-8B
P.O. Box 23660
Oakland, CA 94623-0660

Subject: Comments on the Redwood Parkway—Highway 101 Greenbrae/Twin Cities Corridor Improvements (SCH No. 2009092053)

Department EA No.: 04-1A660

Dear Ms. Shearer:

San Francisco Regional Water Quality Control Board (Water Board) staff has reviewed the California Department of Transportation/Transportation Authority of Marin (Department/Authority) Mitigated Negative Declaration (MND) for the Highway 101 Greenbrae/Twin Cities Corridor Improvement Project (Project) and offer the following comments.

The Water Board will not issue Clean Water Act section 401 water quality certification (certification) for this Project unless post-construction stormwater is treated from a Project area equivalent to all added and reworked impervious surfaces. Page 2.3-7 of the MND notes that approximately 8.35 acres of impervious surface would be added as a result of Project implementation, but does not specify how many acres of impervious surface would be re-worked.

The Department was notified of the Water Board's post-construction stormwater treatment requirements on October 19, 2009, in a Notice of Preparation (NOP) comment letter from the Water Board. The NOP comment letter also advised the Department to identify right-of-way needs for stormwater treatment at the earliest stages of the planning process. Notwithstanding our 2009 letter, the MND does not acknowledge the Water Board's treatment requirements and does not propose specific stormwater treatment quantities, methods, or locations. We are concerned that the MND's failure to identify specific stormwater treatment Best Management Practices (BMPs) suggest that treatment may not be proposed onsite at the level required. Although off-site treatment may be allowed in-lieu of onsite treatment, off-site treatment opportunities along the Marin 101 corridor are extremely limited (based on the Department and

Authority's unsuccessful attempts to identify off-site treatment for the Marin 101 Gap Closure Project) and, we strongly prefer onsite treatment. We encourage the Department and Authority to identify onsite treatment BMPs as soon as possible.

Pace 2.3-13 of the MND correctly notes that San Francisco Bay (Bay) is impaired by trash, but incorrectly notes that the project does not need to consider treatment or target trash in the design of the drainage systems because trash is not a common pollutant in roadway runoff. The Water Board has identified urban runoff as a primary source of trash, which includes runoff from the Department's roads. The Department must control trash in post-construction stormwater runoff. The Department may use post-construction stormwater treatment BMPs that provide full-capture of trash to help prevent trash from reaching the Bay.

The MND does not identify specific measures to mitigate for impacts to tidal salt marsh and waters of the U.S. The MND merely says that:

> *Permanent, direct impacts to waters of the U.S. shall be mitigated through the restoration or creation of wetland habitat…Alternately, mitigation credits may be purchased through an approved mitigation bank, if available. If no mitigation bank is available, mitigation may be accomplished through support of existing or planned conservation projects.*

The Department/Authority must identify specific mitigation measures to compensate for permanent and temporary impacts to jurisdictional waters, prior to the issuance of Project certification. Mitigation in the form of in-lieu fees or land preservation will not be accepted for permanent impacts to jurisdictional waters.

Please contact me at (510)-622-2506, or via e-mail, at BThompson@waterboards.ca.gov, if you have any questions.

Sincerely,

Brendan Thompson
Environmental Specialist

cc: State Clearinghouse
Army Corps of Engineers
California Department of Fish and Game
US EPA

From: Valerie Shearer
To: Shawn Hallum; s.steinwert@circlepoint.com
Subject: Fw: Highway 101 Greenbrae/Twin Cities Corridor Improvements
Date: 02/25/2013 09:37 AM

Robin Moller
<robin@mollers.us>

02/14/2013 05:56 PM

Please respond to
<robin@mollers.us>

To <Valerie_Shearer@dot.ca.gov>

cc

Subject Highway 101 Greenbrae/Twin Cities Corridor Improvements

Valerie Shearer, Caltrans Senior Environmental Planner

I'm writing to ask you to reconsider the TAM proposal for improvements to Highway 101 along the Greenbrae/Twin Cities corridor because:

1. It does not increase capacity on the freeway

2. It does not address the existing flooding issues, nor does it address future sea level rise

3. It does not adequately address the traffic congestion on Sir Francis Drake Blvd., especially traffic to and from 580 and the Richmond/San Rafael Bridge

4. It will cost $143 million

5. It will have massive view impacts as a flyover offramp, two elevated exit lanes and very extensive concrete retaining walls will be constructed

6. These massive structures are out of character with the surrounding small towns

7. It will deliver Larkspur-bound traffic from southbound 101 onto Wornum, and then to Tamal Vista, increasing traffic congestion on already busy two-lane Tamal Vista.

8. It will eliminate the bicycle/pedestrian overcrossing over 101, and redirect these users to an extremely busy and unsafe intersection at Wornum, where

three freeway ramps and multiple road crossings will be constructed which will need be traversed by bike/ped users.

9. The data show the area to have a lower-than-average collision rate.

10. A project such as this that has the potential for significant impacts to views, local traffic, noise or the environment legally requires a full Environmental Impact Report, yet the Transportation Authority of Marin and Caltrans are only completing a less-rigorous Mitigated Negative Declaration, a violation of the California Environmental Quality Act and the National Environmental Policy Act.

11. It does not consider population and traffic increases from development on Tamal Vista (180 units) or the Larkspur SMART station area (900+ units).

12. The planning process has eliminated other, less massive and less expensive options, but that doesn't mean there aren't any other options...

I'd like to see the project design constraints revisited, with input from local and regional groups.

Thank you,
Robin Moller
36 Cedar Avenue
Larkspur, CA 94939
415/609-5663
robin@mollers.us