



METROPOLITAN
TRANSPORTATION
COMMISSION

Joseph P. Bort MetroCenter
101 Eighth Street
Oakland, CA 94607-4700
Tel: 510.464.7700
TTY/TDD: 510.464.7769
Fax: 510.464.7848
e-mail: info@mtc.dst.ca.us

August 20, 1997

James P. Spring, Chair
Solano County and Cities

James T. Beall Jr. Vice Chair
Santa Clara County

Keith Axtell
U.S. Department of Housing
And Urban Development

Jane Baker
Cities of San Mateo County

Sharon J. Brown
Cities of Contra Costa County

Mark DeSaulnier
Contra Costa County

Dorene M. Giacopini
U.S. Department of Transportation

Mary Griffin
San Mateo County

Elibu Harris
Cities of Alameda

Tom Hsieh
City and County of San Francisco

Mary V. King
Alameda County

Jean McCown
Cities of Santa Clara County

Charlotte B. Powers
Association of Bay Area Governments

Jon Rubin
San Francisco Mayor's Appointee

Angelo J. Siracusa
San Francisco Bay Conservation
And Development Commission

Doug Wilson
Marin County and Cities

Kathryn Winter
Napa County and Cities

Sharon Wright
Sonoma County and Cities

Harry Yahata
State Business, Transportation
And Housing Agency

Lawrence D. Dahms
Executive Director

William F. Hein
Deputy Executive Director

Ms. Susan Simpson
Chief, Environmental Planning - North
California Department of Transportation
111 Grand Avenue
Oakland, CA 94623-0660

RE: Marin 101 HOV Gap Closure Project DEIR Comments

Dear Ms. Simpson:

MTC staff has reviewed Caltrans' Draft Environmental Impact Report (DEIR) for the Marin 101 HOV Gap Closure Project and has the following comments.

The fundable alternative examined in this report would construct a southbound-only HOV lane on U.S. 101, widening the southbound direction of the freeway from three to four lanes between North San Pedro Road and Lucky Drive, by the year 2000. This alternative is included in MTC's 1997 Transportation Improvement Program (TIP) and 1996 Regional Transportation Plan (RTP).

The Ultimate Gap Closure project, also examined in this report, would add HOV lanes in both directions between North San Pedro Road and Lucky Drive on U.S. 101, add a new interchange at Irene Street on Interstate 580 and improve the U.S. 101/580 interchange. Funding for the Ultimate Gap Closure project is not currently anticipated and therefore the project is not included in the 1996 Regional Transportation Plan. The DEIS indicates that the Ultimate Gap Closure is evaluated as part of this document because the project could be staged, with the Southbound Only HOV Lane as a first stage.

Air Quality Conformity Analysis

As we communicated to you in our February 27, 1997 letter (attached), the air quality impact analysis for this project is not in conformance with MTC Resolution No. 2270, which outlines Air Quality Conformity Analysis requirements for the MTC region. We anticipate that Caltrans will be preparing a supplemental CO Hot Spot analysis prior to requesting MTC's project review. As you know, MTC will be adopting new conformity analysis procedures, consistent with EPA's conformity guidelines. We expect, however, that the CO analysis for the new guidelines will be identical to that required under Resolution No. 2270 for large

projects like the HOV Gap Closure. We will forward the new guidelines when they are adopted in September 1997. Please provide MTC with a proposed schedule for completing the supplemental air quality analysis and the anticipated date for MTC project review.

Project Alternatives

The Reversible HOV Lane alternative, described on pages 19-20 of the report, was not chosen for examination as part of this environmental document because it is not a fundable alternative. MTC staff believes that this alternative should be considered in the environmental document, as it would likely cost less than the Ultimate Gap Closure project that was retained for study in this document. The Reversible HOV Lane alternative was a recommended improvement in the Marin/ Sonoma Multimodal Transportation and Land-Use study, and will be a likely candidate project for a Marin County sales tax initiative. The Reversible HOV Lane project is also included in the MTC 1996 RTP, while the Ultimate Gap Closure project is not.

The recently completed Marin/Sonoma Multimodal Transportation and Land-Use Study provides a more defined proposal for rail service in the corridor than was available at the time that this document was prepared. Given this new information, Caltrans may want to reconsider whether the right-of-way takes in Segment 3 of the project area to restore the full, double-track width of the Northwest Pacific Railroad right-of-way are still necessary. If the double-track width is no longer required for the level of rail service proposed, it may be appropriate to retain project alternative 2c, partial use of the NWP right-of-way for the Southbound Only HOV Lane, for further study in this document as well. Partial use of the NWP right-of-way would not only limit the number of displaced businesses and houses, it could significantly reduce the overall cost of the project.

Major Investment Study (MIS)

MTC staff agrees that Caltrans has satisfied the MIS requirements. We concur that the HOV Gap Closure project was a "pipeline" project, and the DEIS adequately documents prior studies and planning processes to demonstrate that the project has met the MIS requirement.

Funding Plan

Based on a February 1997 cost estimate, it is our understanding that the fundable project alternative would cost approximately \$51.5 million. It is MTC staffs opinion that this alternative can be fully funded with existing program commitments and reasonably available future STIP programming. The 1996 State Transportation Improvement Program (STIP) includes \$37.7 million in FY 2000 dollars for this project. Additionally, in June of 1996 MTC adopted Resolution No. 2909 which states MTC's commitment to honor the Marin Congestion

Management Agency's request to give first priority for the programming of available 1998 STIP funds within the County of Mann's county minimum to this project, subject to MTC and CTC programming requirements. The County has indicated it will give this project first priority for 1998 STIP funds.

On page 91 of the report, you indicate that the right-of-way costs for Segment 3 of the project are approximately \$3.5 million. It was our understanding from a February 1997 cost estimate that right-of-way costs for Segment 3 would be \$11.9 million. Please explain the reduced cost for this portion of the project.

Finally, MTC staff requests that you provide us with a detailed finance plan for the fundable alternative which indicates all existing program commitments and future anticipated programming to this project, expressed in constant FY 2000 dollars.

Thank you for the opportunity to comment on this draft EIR. If you have any questions about the comments above, please contact Lizzie Kemp, our Marin County Liaison at (510) 464-7804.

Sincerely,



William F. Hein
Deputy Executive Director

cc: Dianne Steinhauser, Division Chief
Ace Forsen, Project Manager

WFH/LK